

FINAL

SSER

Task: Allegation A-54

Reference No.: 4-83-A-88-6

Characterization: It is alleged that there was a failure by Ebasco and site subcontractors to implement their procedures.

Assessment of Allegation: The implied significance of this allegation is that the lack of procedural implementation could cause installations and inspections to be invalid and thereby render the quality of installation as indeterminant.

The NRC staff assessed this allegation to determine if failure to implement procedures is generic (site wide). The staff (1) examined Ebasco's program for controlling the preparation, approval, and revision of site procedures; (2) walked through Ebasco and Mercury procedural interface; (3) verified that NISCO, Tompkins-Beckwith (T-B) and Mercury reviewed turnover quality records in accordance with procedural requirements; and (4) examined the corrective action mechanism for enforcing procedural implementation.

Ebasco Program for Controlling Site Procedures

Ebasco's program for procedure review and approval includes procedures generated by Ebasco engineering and all site contractors. The site quality assurance engineering department and/or other Ebasco disciplines, as required, reviewed procedures affecting quality prior to implementation. Regarding Ebasco's review and approval of site procedures, see Allegations A-188, A-190, A-191 and A-193.

Mercury/Ebasco Procedural Interface

The NRC staff obtained a copy of Ebasco's review, approval, and comments for the initial and current revision of Mercury's QA Records and Control Procedure (QCP-3010). The objective was to verify that Ebasco had reviewed and approved Mercury's procedure prior to implementation. These documents contained recorded comments with resolution, and approval granted to Mercury for procedure issuance and implementation.

A number of Mercury turnover QA documentation packages for the Reactor Coolant instrument lines were reviewed by the NRC staff. These packages had been reviewed and approved by Mercury's QA Document Review personnel using procedure QCP-3010. Ebasco QAIRG also reviewed and approved these packages using procedures QAI 9 and supplement QAIRG No. 15. The results of package and other Mercury documentation reviews are discussed in Allegations A-308, A-183, A-184 and A-197.

Mercury, NISCO and T-B Turnover QA Records Review

The NRC staff reviewed startup system 52A, Reactor Coolant, to verify generic procedural implementation for turnover QA records. Mercury, NISCO and T-B performed QA records reviews in accordance with approved procedures. Ebasco QAIRG conducted a 100-percent review of contractor documentation packages. LP&L used a 10% sampling plan, based upon Mil-STD-1050, to review and audit turnover packages.

NRC staff observed that:

1. Quality record reviews by contractors, Ebasco, and LP&L were adequately documented (stamped, signed, and dated).
2. Structured checklists were used to designate the status of records and nonconformance actions and to accept records.
3. Reviews were conducted for technical adequacy, completeness, proper form, legibility and authenticity.
4. Inspection/test results were documented in detail and traceable to installed hardware.

For additional detail of Mercury, NISCO, T-B, Ebasco, and LP&L review of SUS turnover QA records, see writeups for Allegations A-35, A-143, A-150, A-162, A-163 and A-308.

Corrective Action

When in the judgement of contractor QA/QC personnel, a nonconformance required corrective action, or a recurring condition existed, a request for Corrective Action Report (CAR) was initiated. Corrective action included:

1. Determination of cause.
2. Recommended course to prevent recurrence.
3. Implementation
4. Follow-up to verify effectiveness.

Ebasco performed inprocess audits (surveillance) of construction activities. The NRC staff reviewed a number of surveillance report results. Included in the audits were the evaluation of contractor nonconformance reporting and corrective action to prevent recurrence. NRC noted that corrective action was used to enforce procedural implementation. Allegation A-186(a) details NRC staff review of Ebasco surveillance reports.

Additionally, during the NRC review of all allegations, numerous procedures were reviewed and found to be adequate.

In conclusion, based upon information reviewed, the NRC staff found that site procedural implementation was verified as adequate. Therefore, this allegation has neither safety significance nor generic implications.

[Potential Violations: None.]

Actions Required: None.

References

1. ASME Section III - Nuclear Power Plant
2. ANSI N45.2 - QA Program Requirements for Nuclear Facility.
3. NISCO Procedures - ES-3016-129, Revision A, Final Review of QA Records.
4. Mercury Procedure: QCP-3010 (N49720-Suppl) Quality Assurance Records Control Procedure.
5. T-B Procedures: TBP-20, QA Records Turnover; TBP-35, Preparation and Control of Process Piping Travelers.
6. Ebasco Procedures: QAS 9, Revision 2 and Review of Handling of Construction Deficiencies; QAS 23, Revision 3, Review of Ebasco Construction Quality Records; CP-793, Issue F, Work Package Processing for Ebasco Construction.
7. LP&L Procedure: QA 17.5, Revision 0, Quality Records Station Review.
8. NRC staff Audit Documentation of T-B SUSs 36, 52 and 60.
9. NRC staff audit documentation of Mercury's Reactor Coolant Instrumentation lines.
10. NRC staff audit Documentation of NISCO Piping Installation Records for Reactor Coolant.

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