

SSER

Task: Allegation A-109

Reference No.: 4-84-A-06-4

Characterization: It is alleged that Ebasco Quality Assurance (QA) personnel stopped records reviewers when "wholesale" irregularities, some of which involve <sup>d</sup>civil and perhaps criminal violations, were found in 70 of 1200 concrete placement packages which were reviewed. X

Assessment of Allegation: In an Ebasco interoffice memorandum of June 6, 1983, it was stated that the "QAIRG-BOP" (quality assurance installation review group - balance of plant) was in the process of reviewing the civil QA concrete documentation in the QA vault when they were given oral instructions to cancel the review because Ebasco management claimed the documentation already had been reviewed by qualified reviewers under a qualified QA program. The June 6, 1983 Ebasco memorandum, <sup>has as its intent</sup> attached an Ebasco interoffice memorandum of December 9, 1982, which included discussion of a review of concrete placement packages during which each package was found not to provide adequate documentation. X

On June 9, 1983, another Ebasco interoffice memorandum forwarded the two memorandums <sup>above</sup> just described, plus additional items, to the Ebasco Site QA Manager with a recommendation that the scope of the review of J.A. Jones documents be enlarged. On July 7, 1983, a meeting was held to discuss the review of concrete placement packages and to clarify the concerns expressed in the earlier memos which resulted in the recommendations. X

On July 11, 1983, LP&L's project management group directed Ebasco to perform a 10% review of concrete placement packages, which began in August 1983. Ebasco (in a letter dated September 21, 1983) documented numerous deficiencies, <sup>which</sup> a finding that resulted in the initiation of a 100% review program of concrete placement packages. This effort, completed on January 30, 1984, addressed the X

placement packages for the common foundation basemat, reactor auxiliary building, reactor containment building; fuel handling building, and the shield ring and dome, under Ebasco Procedure QAI-9, Revision 1.

A review of 20 of 28 basemat placement packages by the NRC staff revealed some minor record deficiencies that were not discovered by the Ebasco review. The following three deficiencies were found.

Block-10B: Grouting documentation for core holes drilled in accordance with nonconformance report (NCR) W3-39 were not located in the placement package. Ebasco had to obtain copies of the documentation from J. A. Jones' home office during the course of the NRC Task Group effort.

Block-16: Sheet 5 of 5 of the Concrete Test Record is missing from package.

Block-5B: No cylinders <sup>were</sup> taken at the 150 cubic yards  $\pm$  10 cubic yards interval (Batch Ticket No. 2734).

The concrete placement packages were sampled and reviewed by the NRC Construction Appraisal Team (CAT) prior to this current NRC staff review, but after the Ebasco review. Similar deficiencies in other concrete placement packages were found.

In the first discrepancy, the records were located. In the second case the records were not found, but the NRC staff has no reason to suspect that the tests were not properly run or evaluated. For the third discrepancy, it was found that the exact sequence of sampling was not utilized, but the total number of test cylinders exceeded by one set <sup>(four cylinders)</sup> the number of tests required for the total concrete volume placed. This more random sampling rather than sampling on an exact schedule is considered by some to be a better method for quality control. The NRC staff does not consider this item significant.

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Based on the types of discrepancies and on the ~~few~~ record discrepancies found, the NRC staff concludes that this allegation is not a significant safety issue. ~~The allegation raises a possible generic issue in that minor errors and discrepancies are still found in the records. This conclusion is contingent on the results of investigations being performed by the NRC Office of Investigations and further technical evaluations may be necessary depending on the outcome of those investigations.~~

Potential Violations: The failure of the licensee to have sheet 5 of the concrete test records for placement package 499-S03-16 constitutes a failure to meet Criterion XVII of Appendix B to 10 CFR 50. The regulations require that sufficient records be maintained to furnish evidence of activities affecting quality and that the records be retrievable.

Actions Required: None.

#### References

1. Ebasco's "Documentation Review Instructions," QAI-9 (Revision 1)
2. Ebasco Interoffice Correspondence, Davis to Burgan, dated December 9, 1982.
3. Ebasco Interoffice Correspondence, Hill to Czyrko, dated June 6, 1983.
4. Ebasco Interoffice Correspondence, Czyrko to Stinson, dated June 9, 1983.
5. LP&L Interoffice Correspondence, Gerrets to File on July 7, 1983 Meeting, dated July 11, 1983.
6. Ebasco Interoffice Correspondence, Cutrona to Milhiser, dated September 21, 1983.
7. LP&L Interoffice Correspondence, David to Gerrets, dated December 22, 1983.
8. Concrete Placement Packages for Blocks 1, 2, 4, 5A, 5B, 6, 7A, 7B, 8A, 8B, 9A, 9B, 10A, 10B, 11A, 11B, 14A, 15, 16, and 17.

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