

SSER

FINAL

Task: Allegation A-271

Reference No.: 4-84-A-06-153

Characterization: It is alleged that improper consideration was given to upgrading the process for cleaning and coating the interior of the containment vessel.

Assessment of Allegation: In assessing this allegation, the NRC staff examined the memorandum related to this allegation written prior to application of coatings to the containment vessel by Chicago Bridge and Iron (CB&I) and prior to post-weld heat treatment (PWHT). This memorandum summarizes the investigations, studies and discussions on the subject of containment vessel cleaning and coating. This letter, between Ebasco's New York and site offices, listed three options that could be used to upgrade the cleaning and coating system for Waterford Unit 3 containment vessel prior to PWHT. Ebasco abandoned the three options because each would cause a contract price increase and delays in the construction schedule.

Ebasco's conclusion was basically to make no changes in the coating system, no revision to the specification, no increase in the contract price, and no extension to the construction schedule. Ebasco stated that they hoped any shop primer failure after post-weld heat treatment would be localized and easily repaired.

A review by the NRC staff of the CB&I cleaning and coating system for the Waterford Unit 3 containment vessel, indicated that if CB&I had implemented a good QA program to monitor coating application, the resulting problems discussed in allegation A-256 could have been avoided.

When this memorandum was generated, the issue had safety significance at the time the decision was made not to upgrade the coating work, but subsequent action discussed in A-256 resolved the safety issue. [This is one instance where schedule and cost seemed to have a strong influence on Ebasco's final decision and does not have generic implications.]

[Potential Violations: Review of this memorandum by the NRC staff indicates that LP&L was aware that the protective coating program was deficient. However, LP&L failed to implement or upgrade the program. Both the PSAR and the FSAR committed to ANSI N101.2, and N5.12 (formerly N5.9 in the PSAR), before LP&L submitted a change in the FSAR requiring coatings to comply only partially with these standards. This FSAR amendment (#33) was submitted September 1983. 10 CFR 50, Appendix B, Criterion II requires the applicant (LP&L) to establish at the "earliest" practicable time, consistent with the schedule for accomplishing the activities, a quality assurance program which complies with the requirements of this appendix. Contrary to this requirement, LP&L did not establish a QA program for protective coatings at the earliest practicable time.]

Actions Required: None (Refer to A-256).

References

1. Letter from W. T. Teng (Ebasco, New York Office) to W. L. Sheehan (Ebasco, site) dated December 31, 1975.
2. Purchase Order NY-403405.
3. CB&Is Cleaning and Painting Instructions, dated August 9, 1973.

Statement Prepared By: C. E. Johnson _____ Date _____

Reviewed By: _____ Team Leader _____ Date _____

Reviewed By: _____ Site Team Leader(s) _____ Date _____

Approved By: _____ Task Management _____ Date _____