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Task: Allegation A-136

Reference No.: 4-84-A-06-31

*EBASCO quality assurance*

Characterization: The allegation is that it was difficult for Ebasco (QA) personnel to get approval to initiate a formal nonconformance report between 1975 and 1977 in the civil-structural area.

Assessment of Allegation: The NRC staff reviewed the procedure <sup>for</sup> civil-structural nonconformances between 1975-1977. The Ebasco procedure required a nonconformance report (NCR) when, for example, there were physical defects, test failures, incorrect documentation, or deviations from prescribed inspection or test procedures. An NCR usually followed a discrepancy notice (DN). Unlike a DN, the NCR required a separate evaluation by a QA engineer to see if it should be upgraded to a reportable item under 10 CFR 50.55(e). The allegor stated that, in the early days of construction, QA reviewers were discouraged from writing NCRs to avoid further independent evaluation of discrepancies or safety violations.

*(CAPS)*

The NRC staff reviewed the allegation and found the following:

1. The Ebasco procedure for writing <sup>NCRs</sup> ~~nonconformance reports~~ has been in existence since September 1975. The first DN was generated in October 1975 by Ebasco civil-structural <sup>QA</sup> ~~quality assurance~~ personnel. Therefore, the procedure was available by the time the first DN was written. NCRs were also written in 1975 and 1976, for example, on concrete work associated with the basement. *basemat*
2. LP&L has re-evaluated all the concrete packages, ~~soils packages,~~ <sup>and structural</sup> steel construction packages and found that there is no significant violation of procedures and construction requirements. The NRC staff ~~found~~ <sup>found</sup> no issues during this period which clearly indicated an NCR should have been written but was not.
3. The NRC staff reviewed DNs written between 1975 and 1977 and found none that addressed significant safety issues which were not upgraded to NCRs.

In view of the <sup>NRC</sup> staff <sup>SA</sup> assessment, this allegation has neither safety significance nor generic implications.

This conclusion is contingent <sup>on</sup> the results of investigations being performed by the NRC Office of Investigations and further technical evaluations may be necessary depending on the outcome of these investigations.

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[Potential Violations: None.]

Actions Required: None.

References

1. NCR 5594 and attachments.
2. NCR 6263 (A-141). *see Allegation*
3. Letter from R.S. Leddick, <sup>LPEL,</sup> of Louisiana Power & Light to D. G. Eisenhut, of NRC, "Docket No. 50-382, Waterford Unit 3 Allegations," April 27, 1984, item 2. ✓
4. <sup>CAPS</sup> Ebasco Service, Inc., Waterford-3 Procedure for Nonconformance Report ASP-III-6, <sup>3/5/75</sup> March 5, 1975. ✓
5. J. A. Jones Discrepancy Report, Number 0079 "Concrete Void" <sup>June 30, 1976.</sup> 6/30/76. ✓

Statement Prepared By: S. B. Kim \_\_\_\_\_ Date \_\_\_\_\_

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A-136

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Document Comments:

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SSER

Task: Allegation A-136

Reference No.: 4-84-A-06-31

Characterization: The allegation is that it was difficult for Ebasco QA personnel to get approval to initiate a formal nonconformance report between 1975 and 1977 in the-civil-structural area.

Assessment of Allegation: The NRC staff reviewed the procedure, <sup>which addressed</sup> civil-structural nonconformances between 1975-1977. The Ebasco procedure required a nonconformance report (NCR) when, for example, there were physical defects, test failures, incorrect documentation, or deviations from prescribed inspection or test procedures. An NCR <sup>was</sup> usually <sup>created from</sup> followed a discrepancy notice (DN). Unlike a DN, the NCR required a separate evaluation by a QA engineer to ~~see~~ <sup>ascertain</sup> if it should be upgraded to a reportable item under 10 CFR 50.55(e). The <sup>sample</sup> ~~allegor~~ stated that, in the early days of construction, QA reviewers were discouraged from writing NCRs to avoid further independent evaluation of discrepancies or safety violations.

The NRC staff reviewed the allegation and found the following:

1. The Ebasco procedure for writing nonconformance reports has been in existence since September 1975. The first DN was generated in October 1975 by Ebasco civil-structure quality assurance personnel. Therefore, the procedure was available by the time the first DN was written. NCRs were also written in 1975 and 1976, for example, on concrete work associated with the basement.
2. LP&L has re-evaluated all the concrete packages, <sup>solis</sup> packages and steel construction packages and found that there is no significant violation of procedures and construction requirements. The NRC staff <sup>found</sup> ~~found~~ no issues during this period which clearly indicated an NCR should have been written but was not.
3. The NRC staff reviewed <sup>in the civil-structural discipline</sup> DNs written between 1975 and 1977 and found none that addressed significant <sup>sample</sup> safety issues which were not upgraded to NCRs.

In view of the staff assessment, this allegation has neither safety significance nor generic implications.

This conclusion is contingent on the results of investigations being performed by the NRC Office of Investigations and further technical evaluations ~~may~~ <sup>be</sup> necessary depending on the outcome of these investigations.

Potential Violations: None.

Actions Required: None.

References

1. NCR 5594 and attachments.
2. NCR 6263 (A-141).
3. Letter from R.S. Leddick of Louisiana Power & Light to D. G. Eisenhut of NRC "Docket No. 50-382. Waterford Unit 3 Allegations" April 27, 1984, item 2.
4. Ebasco Service Inc., Waterford-3 Procedure for Nonconformance Report ASP-III-6, 3/5/75.
5. J. A. Jones Discrepancy Report, Number 0079 "Concrete Void" 6/30/76.

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