Task: Allegation A-132

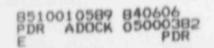
Reference No.: 4-84-A-06-27

Characterization: It is alleged that the J. A. Jones Construction Company used a form of communication cailed "speed letters" to report information that should have been reported in deficiency notices (DNs) and possibly in nonconformance reports (NCRs). This is a concern because "speed letters" are not quality assurance (OA) documents and do not receive an Ebasco QA review.

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The majority of the J. A. Jones speed letters reviewed by the NRC staff were related to logistics of work schedules and performance; however, the staff discovered some speed letters involving deviations from, or changes to, the original design specifications. Examples of deviations and field design changes included; a pilaster 5" too high and requiring modification, slight shifting of reinforcing steel locations, and the use of Cadwelding kits on reinforcing steel sizes other than those sizes for which the kit was made. (See the NRC staff's assessment of Allegation A-171).

The NRC staff's interviews with Ebasco QA personnel revealed that the OA personnel were aware of potential problems regarding the misuse of speed letters, and that QA personnel also believed that the Engineering Information Request (EIR) document was possibly being misused. Ebasco OA personnel informed the NRC staff that they were in the process of conducting a review to



identify potential problems regarding the use of speed letters and the misuse of EIRs. In a memorandum dated February 20, 1984, the Ebasco OA Site Supervisor requested that the Ebasco Site Support Engineering (ESSE) Supervising Engineer review the J. A. Jones speed letters and EIRs. The results of an ESSE cursory review were themselves presented in a speed letter of January 27, 1984. Another Ebasco speed letter of February 18, 1984, substantiated that design changes had been the subject of some of the J. A. Jones speed letters and EIRs reviewed. Although Ebasco itself had used speed letters instead of the required QA documentation to relay this information, they accurately pointed out that a review of Field Change Requests (FCRs) and Design Change Notifications (DCNs) would have to be performed to determine if the issues presented in the J. A. Jones speed letters were also correctly addressed in the required QA documentation.

Based on its review, the NRC staff determined that some of the J. A. Jones speed letters and EIRs addressed areas where DNs, NCRs, or FCRs should have been required by the existing QA program, and that Ebasco QA personnel were aware of these discrepancies in the QA procedures.

When Ebasco's review of the DN, NCR, and FCR files, and LP&L's review and followup are complete, the NRC staff will determine if a violation of QA procedures occurred. However, the staff's review indicated that the vast majority of the items addressed in the J. A. Jones speed letters involved situations with negligible impact on structural integrity or plant safety.

This allegation has no safety significance at this time; however, the generic implications involving the use of documents outside the formal QA program require action by LP&L.

Potential Violations: None.

Actions Required: LP&L shall follow up on the recommendations of Ebasco and perform a comprehensive review of J. A. Jones speed letters and EIRs to identify discrepancies, nonconformances, or field changes in design that could significantly affect structural integrity or plant safety. Because the NRC staff's review indicated that deviations from, and changes to, specifications were not of major safety significance, this action can be completed by LP&L after licensing, but shall be completed before a full power license is granted. If items are found during LP&L's followup and comprehensive review which affect plant safety, then these shall be resolved prior to issuance of the full power license. References Ebasco Services Incorporated Procedure for Inspection and Test Status. WQC-150, Revision 3, dated November 9, 1983 with Amendments 1 and 2. 2. Ebasco Services Incorporated Procedure for Processing of Nonconformances. ASP-III-2, Issue J, dated December 9, 1983 with Amendment 1. 3. Ebasco Services Incorporated Procedure for Design Change Notice and Field Change Request E-69, dated February 20, 1983. 4. Ebasco Services Incorporated Procedure for Design Control ASP-I-4, Issue K. dated June 7, 1983. J. A. Jones/Ebasco "Speed Letters" numbered 0001 through 1122 and written during the period from November 18, 1977 to October 15, 1980 (examples included). Letter from Mr. Sam Horton, Ebasco QA Site Supervisor, to Mr. Brian Grant, Civil Ebasco Site Services Engineering Supervising Engineer, dated February 20, 1984. Subject: Design Review of J. A. Jones Construction Company's Engineering Information Requests and Three Part Memos.

- 3 -

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- 8. Ebasco Services Incorporated Procedure for Control of Information Requests Between Ebasco and Site Contractors.

Statement Prepared By:		
	J. Strosnider	Date
Reviewed By:		
	Team Leader	Date
Reviewed By:		
	Site Team Leader(s)	Date
Approved By:		
	Task Management	Date

Document Name: SSER A-132

Requestor's ID: DEBBIE

Author's Name:

Document Comments: comm from displaywritter 5/29/84

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Potential Violations: Hone.

Contrary to ABB, B criterion XVI, as amplified by the applicants QA Program. He enforthered;

J.A. Jores used "speed letters" in her of BA's,

NCAs, or FCAs.

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See Gastier des comment.

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Statement Prepared By:		
	J. Strosnider	Date
Reviewed_By:		
	Team Leader	Date
Reviewed By:		
	Site Team Leader(s)	Date
Approved By:		
	Task Management	Date

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Potential Violations: None.

- See Item 14 of the enclosure to the letter from D. Exentiat to J.M. Cain (17/1), dated June 13, 1984.

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Statement Prepared B	By:	
	J. Strosnider	Date
Reviewed_By:		
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Reviewed By:		<u> </u>
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Reviewed By:		
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Approved By:		
	Task Management	Date

Document Name: SSER A-132

Requestor's ID: DEBBIE

Author's Name:

Document Comments: comm from displaywritter 5/29/84

> That already neviewed and marked my this one.