

SSER

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 called "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 (QA) documents and do not receive an Ebasco QA review.

Assessment of Allegation: In order to determine the validity and significance of the allegation, the NRC staff reviewed J. A. Jones speed letters 0001 through 1122 dated approximately November 11, 1977 to October 15, 1980, transmitted to Ebasco engineering personnel. These speed letters concerned J. A. Jones concrete work performed in the reactor containment building (RCB), reactor auxiliary building (RAB), fuel handling building (FHR), and concrete basemat. The NRC staff also interviewed Ebasco QA and engineering personnel regarding the use of speed letters.

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 QA 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 QA 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 QA 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

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7. Speed Letters from Mr. Brian Grant to Mr. Sam Horton dated February 18, 1984 and February 27, 1984. Subject: Review of J. A. Jones Speed Letters and Review of J. A. Jones IR's, respectively.
8. Ebasco Services Incorporated Procedure for Control of Information Requests Between Ebasco and Site Contractors.

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	J. Strosnider	Date
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	Team Leader	Date
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	Site Team Leader(s)	Date
Approved By:	_____	_____
	Task Management	Date

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DEBBIE

Author's Name:

Document Comments:

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Assessment of Allegation: In order to determine the validity and significance of the allegation, the NRC staff reviewed J. A. Jones speed letters 0001 through 1122 dated approximately November 11, 1977 to October 15, 1980, transmitted to Ebasco engineering personnel. These speed letters concerned J. A. Jones concrete work performed in the reactor containment building (RCB), reactor auxiliary building (RAB), fuel handling building (FHB), and concrete basemat. The NRC staff also interviewed Ebasco QA and engineering personnel regarding the use of speed letters.

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 QA 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 QA 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 QA 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 DN's, NCR's, or FCR's 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.

Contrary to App. B Criterion XVI, as amplified by the applicant's QA Program, the subcontractor J.A. Jones used "speed letters" in lieu of DN's, NCR's, or FCR's.

6/15 team leader

Is a violation warranted?

See Gaslier dos comment.

See

No



See Item 14 of the enclosure to the  
D. Eisenhower letter to J.M. Carnahan  
June 13, 1984  
- 3 -

*comply with*  
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~~ <sup>59</sup> 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~~ <sup>exceeding 54</sup> power license.

#### References

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Potential Violations: None.

See Item 14 of the enclosure to the letter from D. Eisenhower to J. M. Cain (LP&L), dated June 13, 1984.

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.

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I have already  
reviewed and marked  
up this one.

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