

SSER

Task: Allegation A-19

Reference No.: 4-83-A-74/7

Characterization: It is alleged that record deficiencies existed for 186 separate Fischbach & Moore (F&M) documents.

Assessment of Allegation: The implied significance of this allegation is that record deficiencies may not have been properly identified and processed in the required nonconformance system and that they may have affected hardware installation.

The 186 documents identified 192 separate "issues" requiring investigation. In assessing the allegation the NRC staff divided the "issues" into the following seven general categories:

- (1) 75 of the issues pertained to inspection checklists containing handwritten notes to the effect that the actual quantity of field-run supports attached to a specific engineered support needs to be verified. This concern was identified as a generic problem during the NRC construction appraisal team (CAT) inspection and will be tracked during CAT follow-up inspections.
- (2) 12 of the issues pertained to inspection checklists which had not been signed by the Quality Control (QC) Engineer in the space provided. A review of the procedures in effect at the time revealed that the QC Engineer's signature was not required provided that the QC Supervisor's signature appeared in the space provided for him. The procedure sections which clarified this are QCP-305, Revision 4; November 20, 1980, Section 6.4 and QAP-201W3, Revision 2, January 26, 1981, Section 5.3.1.C. The NRC staff review revealed the inspection checklist missing the signature of the QC Engineer was in fact signed by the QC Supervisor.
- (3) 29 of the issues pertained to documents with handwritten references to a "Dead File" or a "Duplicate File." In conversations with a former F&M records clerk, the NRC staff learned that if two or more duplicate records were generated for the same item or activity, only one was maintained as the official record. The others were placed in a file referred to as either a "Dead File," a "Historical File," or a "Duplicate File." This "Dead File" is now located in F&M's Dallas office. The staff compared 13 of these "Dead File" records with the official records in LP&L's records facility and determined that the official records provide adequate documentation for the installation or activity involved.

- (4) 5 of the issues pertained to various documentation problems for electrical supports that were not adequately addressed. The NRC staff brought these items to LP&L's attention, whereupon they issued LP&L Site Surveillance Report W3S-84-16S to initiate appropriate corrective action. Items 1 through 4 on the site surveillance report encompassed these 5 issues.
- (5) One issue duplicated Allegation A-13 and is discussed in the assessment of that allegation.
- (6) 67 of the issues were listed for which the NRC staff either could not determine the nature of the concern or determined that the concern had been adequately addressed during its normal review cycle.
- (7) Three of the issues duplicated other issues.

The NRC staff concludes that this allegation has neither safety significance nor generic implications.

and then required them to do something - Our 50 letter said "lessen safety sig."
Potential Violations: The record deficiency problems identified are a violation of 10 CFR 50, Appendix B, Criterion V.] 4

Actions Required: LP&L shall prior to exceeding 5 percent power, resolve the issues raised in LP&L Site Surveillance Report W3S-84-16S.

References:

1. 184 documents provided by the allegor.
2. NRC Waterford 3 CAT Inspection Report.
3. Procedure QCP-305, Revision 4, dated November 20, 1980.
4. Procedure QAP-201W3, Revision 2, dated January 26, 1981.
5. LP&L Site Surveillance Report W3S-84-16S, dated May 17, 1984.

Statement Prepared By:

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Date

Reviewed By:

Team Leader

Date

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Date

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Approved By:

Task Management

Date