

SSER

Task: Allegations A-197 through A-206, A-213, and A-216

Reference No.: A-84-06/92, 93, 94, 101, 104

Characterization: It is alleged that Mercury's corrective actions for problems relating to quality control (QC) weld record data sheets were not documented adequately, nor were the reasons for the corrective actions denoted.

Assessment of Allegation: The implied significance is that the lack of adequate review of documentation for technical adequacy and completeness could cause the quality of installation to be in question. Without proper corrective action to determine the root cause and to prevent recurrence, the problem may be corrected, but the system could continue to be deficient.

The NRC staff reviewed 10 operational control record (OCR) packages (refer to Allegations A-183(a) and A-184 and did not substantiate this allegation. However, the records reviewed by the NRC staff were of a later date and consequently, the record deficiencies identified by the allegor had been properly corrected.

The NRC staff discovered the following problem pertaining to missing QC records. Communications between LP&L and EBASCO had prompted an EBASCO revision to an LP&L drawing to clarify the "class break" for N1 instrument lines. The revision imposed ASME Class requirements for all installations between the process piping and the instruments for instrument lines installed after April 7, 1982. Prior to the revision, a class break was defined to show the location where ASME Class requirements did not apply and where ANSI B31.1 guidelines applied.

Although ANSI B31.1 guidelines do not address records retention, 10 CFR 50 Appendix B does require installation and inspection records. Therefore, for locally mounted N1 instruments, even though they were installed prior to April 7, 1982, the QC records could not be located.

The NRC staff found several deficiencies in N1 instrument records of installation and inspection in the zones classified under ANSI B31.1, including weld reports, welder identification, weld filler material, base material, and weld inspection results.

The NRC staff concludes that the lack of QC records for instrumentation installation to ANSI B31.1 is in violation of the requirements of 10 CFR 50 Appendix B, and related QA/QC program elements.

Potential Violations: The lack of QC records violates 10 CFR 50 Appendix B, Criteria VIII, IX, X, XVII, and related criteria of the basic QA program.

Actions Required: See Item 2 of the Enclosure to the letter from D. Eisenhower to J. M. Cain (LP&L) dated June 13, 1984.

References

1. EBASCO Design Change Notice - DCN-NYC-1C-232.
2. EBASCO Design Change Notice - DCN-NYC-1C-232R1.
3. Task A-183(a) and A-184 Staff File, 10 OCR packages.
4. Examples of N1 record deficiencies:

LT-SI-0305B
LT-SI-0305D
PS-CH-0224X
PS-CH-0224Y
PS-CH-0224Z

Statement Prepared by:

J. Stearns

Date

Reviewed By:

Team Leader

Date

Reviewed By:

Site Team Leader(s)

Date

Approved By:

Task Management

Date

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SSER X A-197

Requestor's ID:
CONNIE

Author's Name:
JStearns

Document Comments:

FINAL SSER ROUTING

A-197

Revision :	0	1	2	3
Denny Crutchfield	<i>[Signature]</i>		<i>[Signature]</i>	
✓ Jim Gagliardo			<i>[Signature]</i> 6/21	

FINAL SSER ROUTING

*A197

Revision :	0	1	2	3
Denny Crutchfield				
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Task: Allegations A-197 through A-206, A-213, and A-216

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The NRC staff discovered the following problem pertaining to missing QC records. Communications between LP&L and EBASCO had prompted an EBASCO revision to an LP&L drawing to clarify the "class break" for N1 instrument lines. The revision imposed ASME Class requirements for all installations between the process piping and the instruments for instrument lines installed after April 7, 1982. Prior to the revision, a class break was defined to show the location ~~were~~ ASME Class requirements did not apply and where ANSI B31.1 guidelines applied. *WHERE* ✓

Although ANSI B31.1 guidelines do not address records retention, 10 CFR 50 Appendix B does require installation and inspection records. Therefore, for locally mounted N1 instruments, even though they were installed prior to April 7, 1982, the QC records could not be located.

The NRC staff found several deficiencies in N1 instrument records of installation and inspection in the zones classified under ANSI B31.1, including weld reports, welder identification, weld filler material, base material, and weld inspection results.

The NRC staff concludes that the lack of QC records for instrumentation installation to ANSI B31.1 is in violation of the requirements of 10 CFR 50 Appendix B, and related QA/QC program elements.

Potential Violations: The lack of QC records violates 10 CFR 50 Appendix B, Criteria VIII, IX, X, XVII, and related criteria of the basic QA program.

Actions Required: See Item 2 of the Enclosure to the letter from D. Eisenhut to J. M. Cain (LP&L) dated June 13, 1984.

References

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4. Examples of N1 record deficiencies:

LT-SI-0305B
LT-SI-0305D
PS-CH-0224X
PS-CH-0224Y
PS-CH-0224Z

Statement Prepared by:

Jack D. Stearns
J. Stearns

9-12-84
Date

Reviewed By:

Team Leader

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Site Team Leader(s)

Date

Approved By:

Task Management

Date

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Requestor's ID:
PATTYN

Author's Name:
JStearns

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Do not re route
OK Final after typing*

SSER

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Actions Required:

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Statement Prepared by:

J. Stearns

Date

Reviewed By:

Team Leader

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Site Team Leader(s)

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Task Management

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Document Name:
SSER X A-197

Requestor's ID:
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Author's Name:
JStearns

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

Document Name:
SSER A-197

Requestor's ID:
STCINDY

Author's Name:
JStearns

Document Comments:

REVISION 1
06/13/84

SSER

Task: Allegations A-197 through A-206, A-213, and A-216

Reference No.: A-84-06/92, 93, 94, 101, 104

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Potential Violations: The lack of QC records violates 10 CFR 50 Appendix B, Criteria VIII, IX, X, XVII, and related criteria of the basic QA program.

Actions Required: LP&L shall, prior to fuel load, take the following action:

1. Provide the missing documentation required by 10 CFR 50 Appendix B for the ANSI B31.1 instrumentation for local mounted instruments.
2. Review other design changes and documentation for all safety-related N1 instrumentation systems to assure all system installations were properly documented and inspected.
3. If the QC documentation cannot be located, action must be taken to assure affected portions of safety-related systems comply with NRC requirements.

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Statement Prepared by:

J. Stearns

Date

Reviewed By:

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Site Team Leader(s)

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Task Management

Date

Document Name:
SSER A-197

Requestor's ID:
STCINDY

Author's Name:
JStearns

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FILE
Patty
I have already corrected the name
6/14 was by ~~removed~~
check action required ~~against~~
L/R

6/14 Re type R 2
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REVISION 1
06/13/84

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*of the Enclosure to
See item 2 enclosed in the D Eiman hot
letter for cam (LP&L) dated June 13, 1984.*

Statement Prepared by:

J. Stearns

Date

Reviewed By:

Team Leader

Date

Reviewed By:

Site Team Leader(s)

Date

Approved By:

Task Management

Date