

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).

Assessment of Allegation: The implied significance of this allegation is that "speed letters" are not quality assurance (QA) documents and do not receive an EBASCO QA review.

In order to determine the validity and significance of the allegation, the NRC staff reviewed J. A. Jones speed letters numbered 0001 through 1122 covering the period of November 1977 to October 1980. These speed letters had been transmitted to EBASCO engineering personnel and 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 the 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.

The NRC staff review 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 practices.

This allegation has no safety significance based on the staff's preliminary findings; however, the generic implications involving the use of documents outside the formal QA program require action by LP&L.

Potential Violations: When EBASCO's review of the speed letters and EIRs 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.

Actions Required: See Item No. 14 of the Enclosure to the letter from D. Eisenhower to J. M. Cain (LP&L), June 13, 1984.

References:

1. EBASCO Services Incorporated. Procedure for Inspection and Test Status, WQC-150, Revision 3, November 9, 1983, with Amendments 1 and 2.
2. EBASCO Services Incorporated Procedure for Processing of Nonconformances, ASP-III-2, Issue J, December 9, 1983, with Amendment 1.
3. EBASCO Services Incorporated Procedure for Design Change Notice and Field Change Request E-69, February 20, 1983.
4. EBASCO Services Incorporated Procedure for Design Control ASP-I-4, Issue K, June 7, 1983.
5. 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).
6. Letter from Mr. Sam Horton, EBASCO QA Site Supervisor, to Mr. Brian Grant, Civil EBASCO Site Services Engineering Supervising Engineer, February 20, 1984. Subject: Design Review of J. A. Jones Construction Company's Engineering Information Requests and Three Part Memos.

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 IRs, respectively.
8. EBASCO Services Incorporated Procedure for Control of Information Requests Between EBASCO and Site Contractors.

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