

D/R - typing 9/8/83
A 49, 78, 87, 123 in Review process
A 181, 283 in Review 0 2

DRAFT 1 ✓ ECW W/L
05/24/84 (TSK4)

SSER

Task: Allegations *A-49; A-78; A-87; A-123

Reference No.: 4-83-A-88/2c; 4-83-A-88/1; 4-83-A-88/3A1; 4-84-A-06/18

Characterization: ^{it is alleged} These are four miscellaneous allegations, stating that individuals were prevented from writing NCR's or forced to rewrite specific NCR's and ^{that} subsequent ^{quality assurance (QA)} documentation may be falsified.

Assessment of Allegation: ^{The NRC staff assessed four specific allegations.} The implied significance of these allegations is that identification and correction of nonconformances may have been curtailed and ^{may have} impacted installed ^{and} systems. Also, inadequate hydrostatic testing may have been performed on safety systems, ^{which might not have been verified if QA documentation was falsified.}

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1. ^{First, it is alleged that} Allegations A-49. Individuals were not free to write NCR's. The NRC staff ^{assessed} reviews this allegation in conjunction with Allegation A-283 using the following methodology: ^{by} Reviewed ^{ing} all procedures utilized by Mercury, Tompkins-Beckwith, ^(T-B) and Ebasco concerning the reporting, disposition, and correction of discrepancies, deficiencies, and nonconforming items.

The ^{NRC} staff ^{found} concluded that ^{adequate} procedures were ^{existed} in place to allow employees to report apparent abnormalities in facility construction. (See Allegations A-53, A-93). The procedures ^{do} specify ^{led} that supervisors and management ^{were} are responsible for specifying the ^{processing} and disposition of items, ^{and that} but the emphasis ^{was} is that other personnel ^{were also} are responsible for reporting items. The NRC staff found no objective evidence that ^{contractor} management ^{exerted} pressure ^{on individuals} or other wise suppressed the writing of NCR's.

^{This allegation has neither safety significance nor economic implications.}

2. ^{second, it is alleged} Allegation A-78. The allegation is that NCR's written by Mercury ^{quality control} (QC) inspectors on welding problems were not processed by QA/QC supervisors or management, ^{and} Also, that documentation was subsequently falsified to reflect the absence of nonconforming items. The NRC staff evaluated this allegation in conjunction with Allegations A-81 and A-82 by reviewing

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This is acceptable industry practice.

data packages for 28 different Mercury Operational Control Records (OCR's) on various instrumentation lines. ^{The staff also performed} System walkdown ^{were also} performed on ^{9/19} of these installations, all of which were found to be correct. _{by the nrc staff}

It ~~shall~~ ^{should} be noted that procedures on the disposition of welding discrepancies generally state that weld defects in ^{the} process of inspection and repair are not required to be reported as nonconforming items, discrepancies, or deficiencies, and that only the final inspection is required to be documented. Reporting procedures also state that reporting is a supervision ^{or mgt} management decision. _{The NRC staff found these reporting procedures to be adequate.}

In conclusion, ^{the} NRC staff found the installation ^{to be correct and the} above procedural ^{requirements} statement to be adequate. _{This allegation has neither safety significance nor generic implications.}

^{Allegation A-87} ~~Allegation A-87~~. ^{Thinks} ^{alleged that a QA} A quality assurance engineer assigned to Mercury, but employed by Ebasco, was forced to rewrite an NCR by Ebasco quality assurance management. ^{QA} The NRC staff reviewed this allegation by evaluating NCR's W3-6719, W3-6719, R1, and ^{an} unnumbered NCR, ^{previously} submitted to the Waterford III NRC Resident Inspector. It was noted that the unnumbered NCR was dated August 17, 1983. The original NCR W3-6719 ^{was} dated August 17, 1983, and closed out on August 22, 1983, ^{with an} ~~rating~~ ^{inmate stating} that the ^{QA} quality engineer ^{concerns} were invalid due to the ^{generalities} ~~in these~~ concerns; this NCR was subsequently "Voided" and reissued as Rev. 1. NCR W3-6719/R1 ^{was} issued on August 23, 1983. The staff could not determine that the individual ^{had been} "forced" to rewrite the NCR. ~~However, a thorough~~ ^{The staff} review ^{of} NCR W3-6719/R1, ^{which} that was closed out on October 13, 1983, ^{and found} revealed the following:

(a) Attachment 3, page 1. A supporting statement at ^{the} bottom of ^{the} page ~~uses~~ ^{an} ~~analogy~~ ^{that} that indicates ^{that} the test fluid was ^{located} ~~located~~ ^{H₂O} instead of demineralized ^{H₂O}. WATER. _{BOILED WATER}

procedures to be adequate

✓

6719/R1

(b) Attachments 10, 12, and 13 ^{used} utilized in the closure of W3-6719/R1 ^{were} are authorized by the originator, ^{who stated} stating that he concurs ^{with} with the NCR closure ^{disposition}.

(c) The original NCR (W3-6719) suggests ^{ed} that many cases may have occurred where ⁱⁿ a system was not tested to minimum test pressure, ^{that} or a system may have been overpressurized because of failure to consider the position of test instruments and static ^{had} considerations.

Ebasco's ^{recommended} disposition was to review "all" hydrostatic test packages, for test ^{conducted} conducted by Mercury, to ascertain ^{what were} the actual conditions ^{of the test}. ^{The NRC staff found} There is no evidence that this specific review was accomplished.

(d) Attachment #16 to W3-6719/R1 indicates ^d that the design pressure at a specific height, in the previously tested system, has been reduced by approximately 23 psi to accommodate the previously witnessed and accepted test pressure. There ^{is} no documentation that the lower design pressure ^{was} is acceptable for this system (passive portion of ^{the} ECCS).

emergency core cooling system

(e) The above ^{hydrostatic test conditions were} situation was assumed by Ebasco to be the "worst case" and therefore ^{that} "all" other hydrostatic tests performed by the Mercury Company ^{were} are deemed satisfactory. This ^{was} is not the case, ^{since only one test} as lower pressure tests with lower allowable test pressure deviation could be ^{was} reviewed. ^{unsatisfactory}.

Therefore, because of the improper and incomplete corrective action plan, the hydrostatic testing results in question, this allegation has safety significance and generic implications.

Due to the items noted above, the NRC staff ^{has} determined that Ebasco Quality Assurance Management has ^{improperly} dispositioned and closed NCR-6719/R1. ^{The}

This is the proper justification for the ^{proper} disposition should have been in accordance with the ASME Code Interpretation III-1-78, dated (January 5, 1978), that resolved this problem. Also see Allegation A-88, A-89, A-90, A-91, and A-315. ^{Contingent upon proper disposition of NCR-6719/R1, this allegation has neither safety significance nor generic implications.}

4. ~~Fourth~~ Allegation A-123. It was alleged that Ebasco contract QA document reviewers working on Mercury records were not allowed to look in the field because they were finding too many problems; ^{and that} Reviewers working with ~~Tompkins-Beckwith~~ encountered similar problems.

this is INSERT A

The NRC staff investigated this allegation in conjunction with Allegations A-283 and A-49 ^{The staff found one} and could not substantiate this allegation. ^{ion that records reviewers were prevented from writing NCR based on field work.}

The NRC reviewed procedures which defined document reviews responsibilities.

The procedural requirement for field verification was less stringent than Ebasco QA procedures.

The NRC staff reviewed ^{Ebasco QA} ~~revealed that Ebasco~~ procedures that address the responsibilities of QA records reviewers, and ^{The staff's review revealed that those procedures adequately} found that both the 1979 and 1983 revision provide detailed instructions for the collection, handling, status and review of construction and installation QA records. ~~The QA~~

~~statement~~ "Concerns regarding discrepancies in plant configuration shall be brought to the attention of the Ebasco QA Surveillance Group for action." ^{This statement was not a} There is no requirement in the procedures that makes it necessary for a ^{QA} records reviewer to go to the field ^{or prevent him/her} from doing so.

In conclusion, the allegation that ^{records} document reviewers were not "allowed" to look in the field is probably true; however, it is an employers option to direct the efforts of employees towards goals for which they were hired. ^{Ebasco QA/QC} records verification groups were available to the records reviewers for any field work.

~~A QC verification group was available to the records reviewers to perform any heat number verification activities.~~

~~There are staff actions that adequate field support was available to QA~~ This allegation therefore has neither safety significance nor generic implications.

Potential Violations: None. Improper corrective action is a violation of 10 CFR 50, Appendix B, Criterion XVI.

Actions Required: LP&L shall assure the proper disposition of NCR W3-6719/R1 prior to fuel load.

- 1. Review of all Mercury hydrostatic test requirements and test results. including a
- 2. Take necessary corrective action to assure that

^{safety}
all systems are tested as required.

References

1. Mercury Operation ^{of} Control ^{Record} Report (OCR)

OCR-1019
OCR-1020
OCR-1022
OCR-1782
OCR-1881
OCR-1885

2. Ebasco NCR's unnumbered

W3-6719
W3-6719/R1

3. Ebasco Administrative Site Procedure (ASP)

ASP-III-6
ASP-III-7

4. Ebasco Corporate Procedure N-23

5. Ebasco Quality Assurance Instruction (QAI)

QAI-9
QAI-19
QAI-31

6. Tompkins-Beckwith Procedure ^{TBP} 12

7. Mercury Procedure SP-664, ² "Handling of Nonconformances and Corrective Action."

Administrative
Reference
A-282
A-283
A-284
A-285
A-286
A-287
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A-292
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