

SSER

Task: Allegations *A-279, A-280, A-282, A-284, A-288, A-27

Reference No.: 4-83-A-81/B1, 4-84-A-06/161, 4-84-A-06/169, 4-84-A-06/162, 4-84-A-06/164, 4-84-A-06/166

Characterization: The allegation is that inadequate documentation reviews were performed by Tompkins-Beckwith (T-B), EBASCO, and Mercury in that open deficiencies were found in packages which had been reviewed and accepted.

Assessment of Allegation: The implied significance of this allegation is that inadequate review of quality documentation could cause installation to be questionable and inspection results to be invalid because of a lack of assurance of technical content and completeness.

The NRC staff reviewed the turnover packages (system QA documents) for T-B, EBASCO Construction (Force Account), and Mercury. The staff also reviewed the following procedures: Mercury Co., QPC 3010; T-B, TBP-20 and TBP-35; and EBASCO, QAI No. 1, QAI No. 9, QAI No. 9A.

Mercury, T-B, and EBASCO Quality Assurance Installation Review Group (QAIRG) had reviewed 100% of the QA documents.

Tompkins-Beckwith (T-B)

In its QA documentation review, T-B found the turnover packages to be acceptable. A subsequent review by EBASCO QAIRG revealed problems such as incomplete/incorrect documentation. T-B took actions and corrected the deficiencies, as confirmed by a later EBASCO QAIRG review. The NRC staff reviewed selected documentation for technical adequacy, completeness, and evidence of proper contractor and EBASCO review and concluded that QA documentation was adequate.

Mercury Company

A review was conducted by the NRC staff that included six Mercury Operational Control Records (OCR). No open Nonconformance Reports (NCRs) were found in the Mercury documentation reviewed. OCR Package 1782, drawing 172-112-C, Revision 4, had a handwritten note on it identifying two lines, DPT-RC-9116 SMB (HP) and DPT-RC-9116 SMA (HP), where the separation criteria had been violated. LP&L had initiated an Engineering Discrepancy Notice (EDN) to document this problem and subsequently generated an NCR (W3-7702). This problem was not identified during the review and closeout of the Mercury OCR packages and as such was an open item. In addition to the NCR, LP&L was looking at all OCRs in Startup System (SUS) 52A for any other separation criteria violations. The NCR analysis showed that the expansion loops, which were the cause of the violation, can be removed (reworked) thus eliminating this problem. The safety significance and generic implications will depend on the outcome of LP&L's review of the rest of SUS-52A.

In OCR package 1020 for line DPT-RC-120/121 (LP), duplicate weld record sheets were found for field welds FW-1, 1C, 1D, 51 and 52. One weld record showed these welds as deleted and the other sheet showed them as being acceptable. A walkdown of the system revealed that these welds are not a part of the installation and that the drawing accurately reflects what is installed. LP&L has initiated the required actions to remove the inaccurate record from the OCR package. The NRC staff considered this is an isolated occurrence and found no safety significance or generic implications.

EBASCO Construction (Force Account)

The NRC staff review of EBASCO Force Account quality documentation turnover packages disclosed that they were, in general, adequately reviewed. The exception was work accomplished as a result of the disposition of nonconformance reports (NCRs). NCR work packages were closed out and submitted to the vault without an independent review by EBASCO QA or QAIRG. Upon detection of this problem by the NRC staff, EBASCO instituted the following corrective action: (1) the applicable procedures were revised to assure independent review by EC-QA and QAIRG; (2) affected QA/QC personnel were instructed, in formalized training classes, of the procedural changes; and (3) the number of affected packages (twelve) were determined and submitted to EC-QA and QAIRG for review. The NRC staff re-reviewed five of the twelve work packages and found them to be acceptable.

Based upon the above reviews, the NRC staff found that Ebasco had an adequate system for identifying and resolving deficient items in work packages. Ebasco also informed LP&L System Startup about system status via a cover letter noting exceptions as "System Turn-Over Exceptions."

Indoctrination and training of personnel performing document reviews was reviewed by the staff and is documented in Allegations A-109 and A-294. See also Allegations A-143, A-150, A-162, A-163, A-188, A-190, A-191 and A-193 for more details in this area.

In conclusion, the reviews of contractor and Ebasco QA documentation by the NRC staff revealed the procedural controls and actual documentation to be technically adequate and complete, and that documentation deficiencies were identified and corrected in most cases prior to system turnover. The items with corrective action remaining open were identified as system turnover exceptions. The issue on the instrumentation separation criteria violation was significant and may have generic implications; the other issues have neither safety significance nor generic implications.

Potential Violations: The separation criteria for instrumentation lines was violated for system SUS-52A, Reactor Coolant.] 4

Actions Required: (See Item 3 in the Enclosure to the D. Eisenhut letter to J. M. Cain, June 13, 1984.)

References

1. Mercury Procedure QPC-301D
2. T-B Procedures TBP-20, TBP-35
3. Ebasco Procedures QAI No. 1, QAI No. 9, QAI No. 9A
4. Ebasco Procedure QA-31, QAI-9, ASP-III-7, and CP-793
5. Staff Audit documentation of Ebasco's NCR
6. Staff Audit documentation of Mercury's & T-B's Turn-over work packages.

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FINAL SSER ROUTING

279

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✓ Denny Crutchfield	<i>[Signature]</i> 6/17			
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