

10

REPORT OF INTERVIEW

Report Number: Q-1-84-021

Robert G. LAGRANGE was interviewed on December 6 and 14, 1984 by the reporting Investigator. LAGRANGE has been a Section Leader in the NRC's Equipment Qualification Branch, Office of NRR, since April, 1982. The section was formed in April, 1980 and since its inception, LAGRANGE has been the Three Mile Island (TMI) Equipment Qualifications Reviewer. The intent of this interview was to discuss information contained in an October 17, 1984 memorandum from Ben HAYES, Director, Office of Investigations (OI), to William J. DIRCKS, Executive Director of Operations. The memorandum identifies a series of submittals received from General Public Utilities (GPU) between 1980 and 1984, pertaining to GPU's Three Mile Island, Unit 1 (TMI-1), Environmental Qualification Program. The memorandum identified 14 areas of NRC concern which were the focus of the instant interview. Each of the 14 areas was discussed with LAGRANGE to assist in making a determination as to which areas of concern, if any, should be the subject of investigation by OI.

The first five areas of concern identified 13 submittals received from GPU between October 31, 1980 and March 24, 1982. These documents were identified on pages 2 thru 5 of the October 17, 1984 memorandum (HAYES to DIRCKS) mentioned above. LAGRANGE said that he could not identify any false statements in the 13 submittals. LAGRANGE said that while he disagreed with some of the statements made in the documents, he characterized the disagreements as "professional differences of opinion". He said that this problem was not just unique to just TMI and that such disagreements over Environmental Qualification (EQ) issues between the NRC and the utilities, occurred at virtually every plant that made EQ submittals. In several instances, LAGRANGE described the GPU responses as "inadequate" but added that it was the staff's position that the documents did not contain any material false statements.

The sixth area of concern in the October 17, 1984 memorandum identified a GPU submittal dated May 20, 1983. LAGRANGE said that the submittal was in response to 10 CFR 50.49 which required all licensees to identify the electrical equipment important to safety within the scope of Section 50.49(g) that is already qualified, and to submit schedules for environmental qualification or

replacement of the remaining equipment that is important to safety as defined in 10 CFR 50.49(b). LAGRANGE said that on the first page of the May 20, 1983 submittal, the licensee stated that:

GPUN letter dated August 28, 1981 (LIL238) in response to IEB 79-01B lists all the safety related electrical equipment which is required to be and which is already qualified. The additional information we submitted in our letters dated May 3, 1982 (5211-82-101) and May 16, 1983 (5211-83-076) (NUREG-0737 items), support our conclusions that the components listed are qualified in accordance with DOR guidelines dated November, 1979.

LAGRANGE stated that the above statement was clearly a false statement in that some of the components GPU listed as qualified, were not qualified; however, LAGRANGE advised that every utility had to respond to the rule and that none of the responses were relied on or utilized by the NRC in any manner. He said there was really no intent not to use the responses, it was just that he felt it would be more advantageous to meet personally with the licensees to resolve problems rather than generating questions and answers back and forth between the NRC and the utilities. He said that he felt the face-to-face meetings and the follow-up inspections was the best way to resolve the issues that existed between the NRC and the licensees. LAGRANGE said that as a result of this decision, he met with GPUN's Equipment Qualification Section in October, 1983. LAGRANGE advised that he had decided "pretty early on" that TMI's environmental qualification problems, as well as some other utilities, would have to be resolved via face-to-face meetings and inspections. He said that as far as the Equipment Qualification Branch was concerned, that sometime after the October meeting, his section had decided that in TMI's case, they would not rely on any of GPU's submittals because the October meeting made it obvious that "the utility did not know what they were doing or had to do, to resolve the deficiencies which had been identified to them." He identified the person in charge of GPU's EQ program as Mr. MAUS. LAGRANGE opined that MAUS was clearly not capable of handling the job. LAGRANGE stated that the whole area of EQ requirements had become a bigger project than originally thought. He cited the extension of qualification deadlines as supporting evidence.

The next area of concern involved an August 25, 1983 GPUN submittal which discussed replacement of Controlotron EFW Sonic Flow devices with Foxboro NE 13DM D/P transmitters. LAGRANGE said that he did not know why the letter was

submitted to the NRC and that it was not submitted to his Equipment Qualification Section nor was it utilized by his Section. He said that in the submittal, GPU claimed that their transmitters were environmentally qualified. LAGRANGE said that the transmitters were in fact qualified but at the time, GPU did not have the paperwork to support the claim.

The next area of concern involved two GPU submittals dated February 10 and 22, 1984. LAGRANGE stated he did not feel the February 22, 1984 GPU submittal contained any false statements. He said he did feel that the February 10, 1984 submittal did contain a false statement which he identified as follows: "It is GPUN's position that TMI-1 is currently in compliance with the Environmental Qualification Rule 10 CFR 50.49 as applicable to TMI-1." LAGRANGE said that Rule 50.49 specifically says that one must have "auditable files" and GPU did not have auditable files. LAGRANGE said this was established from a March, 1984 staff audit of GPUN files and several subsequent audits. LAGRANGE said he could provide approximately 13 examples of equipment qualifications for which GPU did not have auditable files. LAGRANGE said when he received the February 10, 1984 GPU submittal, he knew that he was not going to rely on the submittal because it was "too vague and did not address all of the deficiencies in the TER". LAGRANGE emphasized that by February 10, 1984, he had decided that he would no longer rely on any of GPUN's submittals concerning their Environmental Qualification Program. LAGRANGE acknowledged that during the late 1983 - early 1984 time period, if specifically asked to do so, he could find similar invalid statements made by other licensees in their responses to the NRC. He added that the TMI-1 responses were exceptionally "bad" when compared to most other licensee responses and it appeared (in the case of TMI-1) that the licensee had done "very little in the area of EQ".

The next area of concern involves a February 24, 1984 GPUN submittal which was in response to a UCS petition. LAGRANGE said he disagreed with parts of the document but feels that the wording in the document is "too vague to argue about" and the same issues can be pursued by investigating the February 10, 1984 submittal.

The next area of concern involved a meeting that took place on March 9, 1984 between LAGRANGE, members of his Section, and Mr. MAUS, who was in charge of

GPU's Environmental Qualification Program. During the meeting, LAGRANGE asked MAUS if GPU files addressed TER deficiencies and resolved them. MAUS responded that, "we are confident we have that, yes". LAGRANGE said the GPUN files did not address and resolve all of the deficiencies previously noted in the TER. LAGRANGE said this statement was similar to that made in the February 10, 1984 GPU response and the same TER deficiencies would pertain.

The next area of concern involves a March 26, 1984 GPUN submittal. LAGRANGE described the submittal as an amended response to the UCS petition. LAGRANGE said that in the submittal, a statement is made that the EQ of the TMI-1 emergency feedwater system "poses no undue risk to the public health and safety". LAGRANGE described the statement as "weak" in light of existing conditions at the time.

The next area of concern involves a March 29, 1984 GPU submittal containing EQ information on emergency feedwater equipment. In this submittal, GPU lists seven items (A thru G) as EQ qualified. LAGRANGE advised that on March 20 and 21, 1984, his Section told GPUN specifically that items A, B, E, F, and G were not qualified and why they were not qualified. LAGRANGE advised that GPU's statements made in relation to items A, B, E, F, and G are false only because GPUN's basis is unsatisfactory/not acceptable. He said they appeared to have just ignored what his Section had told them during their audit on March 20 and 21, 1984. He said the submittal addresses his Section's concern in a vague and general manner.

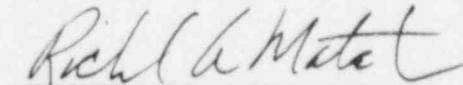
The next area of concern involves an April 26, 1984 GPU amended response to the UCS petition. In the submittal, GPU states that certain structural modifications to the TMI-1 intermediate building would increase the volume of intermediate building available to accommodate flood water and would result in an increase to the amount of time before the water level reaches any EFW system equipment which is not qualified for submergence. LAGRANGE said this statement would be true if, as the licensee presumed, the DIW and anaconda cable were EQ qualified; however, LAGRANGE disagreed with the GPU assumed qualification of these two items. LAGRANGE described the statement as a difference of technical evaluation and not a material false statement.

The last item of concern involved a May 7, 1984 GPU submittal which addressed radiation deficiencies identified in the TER. Specifically, LAGRANGE said that GPUN took the position that the W pump motor was qualified and his Section disagreed with the assumption. LAGRANGE said that his Section pressed GPU for additional qualification of the motors and finally, on March 31, 1984, GPU wrote an amended response to the UCS petition stating they could not document the pumps as "qualified" so they were going to replace the connection on the pump motor termination with qualified splices.

LAGRANGE concluded by stating that he did not feel that GPUN intentionally made any material false statements in any of the eight aforementioned submittals. He said that he believes that GPU "really just did not know what they were doing" in the area of environmental qualifications and GPU Management was not keeping track of what the GPU EQ Section was doing.

End of results of interviews with Robert G. LAGRANGE.

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