



PDR-016

RESPONSE TO FREEDOM OF INFORMATION ACT (FOIA) REQUEST

NRC FOIA REQUEST NUMBER(S)

FOIA-87-866

RESPONSE TYPE

FINAL

PARTIAL

DATE

APR 21 1988

DOCKET NUMBER(S) (if applicable)

REQUESTER

Lynn Connor

PART I. - RECORDS RELEASED (R) OR NOT LOCATED (See checked boxes)

No agency records subject to the request have been located.

No additional agency records subject to the request have been located.

Agency records subject to the request that are identified in Appendix \_\_\_\_\_ are already available for public inspection and copying in the NRC Public Document Room, 1717 H Street, N.W., Washington, DC.

Agency records subject to the request that are identified in Appendix A are being made available for public inspection and copying in the NRC Public Document Room, 1717 H Street, N.W., Washington, DC, in a folder under this FOIA number and requester name.

The nonproprietary version of the proposal(s) that you agreed to accept in a telephone conversation with a member of my staff is now being made available for public inspection and copying at the NRC Public Document Room, 1717 H Street, N.W., Washington, DC, in a folder under this FOIA number and requester name.

Enclosed is information on how you may obtain access to and the charges for copying records placed in the NRC Public Document Room, 1717 H Street, N.W., Washington, DC.

Agency records subject to the request are enclosed. Any applicable charge for copies of the records provided and payment procedures are noted in the comments section.

Records subject to the request have been referred to another Federal agency(ies) for review and direct response to you.

In view of NRC's response to this request, no further action is being taken on appeal letter dated \_\_\_\_\_.

PART II. A - INFORMATION WITHHELD FROM PUBLIC DISCLOSURE

Certain information in the requested records is being withheld from public disclosure pursuant to the FOIA exemptions described in and for the reasons stated in Part II, sections B, C, and D. Any released portions of the documents for which only part of the record is being withheld are being made available for public inspection and copying in the NRC Public Document Room, 1717 H Street, N.W., Washington, DC, in a folder under this FOIA number and requester name.

Comments

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PDR FOIA  
CONNOR87-866 PDR

SIGNATURE, DIRECTOR, DIVISION OF FILES AND RECORDS

Linda Robinson for Donnie Greisley

APPENDIX ARECORDS MAINTAINED IN THE PDR UNDER THE ABOVE REQUEST NUMBER

Items 1 through 4 are copies of same memo to multiple addressees in Region I, III, IV, and V. The enclosures are different. The staff was unable to locate any records for Region II for the period of 1984.

1. 5/31/84 To Richard W. Starostecki, Region I from J. Nelson Grace, subject: Assessment of Implementation of Regional Inspection Program for Reactor Construction. (3 pages)
2. 5/31/84 To Charles E. Norelius, Region III from J. Nelson Grace, subject: Assessment of Implementation of Regional Inspection Program for Reactor Construction. (3 pages)
3. 5/31/84 To Tom Bishop, Region V from J. Nelson Grace, subject: Assessment of Implementation of Regional Inspection Program for Reactor Construction. (2 pages)
4. 6/1/84 To Richard P. Denise, Region IV from J. Nelson Grace, subject: Assessment of Implementation of Regional Inspection Program for Reactor Construction. (3 pages)
5. 6/19/85 To R. W. Starostecki, Region I from J. G. Partlow, subject: Assessment of Implementation of the NRC Inspection Program by Region I at Millstone Nuclear Power Station Unit 3. (33 pages)
6. 6/19/85 To R. D. Walker, Region II from J. G. Partlow, subject: Assessment of Implementation of the NRC Inspection Program by Region II at Shearon Harris Nuclear Power Plant. (11 pages)
7. 6/19/85 To C. E. Norelius, Region III from J. G. Partlow, subject: Assessment of Implementation of the NRC Inspection Program by Region III at Braidwood Station. (26 pages)
8. 6/19/85 To D. F. Kirsch, Region V from J. G. Partlow, subject: Assessment of Implementation of the NRC Inspection Program by Region V at Palo Verde Unit 3. (10 pages)
9. 6/21/85 To R. P. Denise, Region IV from J. G. Partlow, subject: Assessment of Implementation of the NRC Inspection Program by Region IV at River Bend Station. (13 pages)
10. Undated To C. E. Norelius, Region III from J. G. Partlow, subject: Assessment of Implementation of the NRC Inspection Program by Region III at Clinton Nuclear Power Station. (27 pages)

APPENDIX A  
(Continued)

RECORDS MAINTAINED IN THE PDR UNDER THE ABOVE REQUEST NUMBER

Items 11 through 15 are copies of the same memo to multiple addressees in Region I, II, III, IV, and V. The enclosures are different from each memo.

11. 3/17/86 Memo to Regional Division Directors, Region I from IE Division and Staff Directors, subject: Integrated Interim Regional Assessment. (13 pages)
12. 3/17/86 Memo to Regional Division Directors, Region II from IE Division and Staff Directors, subject: Integrated Interim Regional Assessment. (14 pages)
13. 3/17/86 Memo to Regional Division Directors, Region III from IE Division and Staff Directors, subject: Integrated Interim Regional Assessment. (13 pages)
14. 3/17/86 Memo to Regional Division Directors, Region IV from IE Division and Staff Directors, subject: Integrated Interim Regional Assessment. (11 pages)
15. 3/17/86 Memo to Regional Division Directors, Region V, from IE Division and Staff Directors, subject: Integrated Interim Regional Assessment. (11 pages)
16. 5/30/86 Memo to D. F. Kirsch, from J. G. Partlow, subject: Assessment of Implementation of the NRC Inspection Program by Region V at Palo Verde Unit 3. (27 pages)
17. 5/30/86 Memo to C. E. Norelius, Director, DRP, Region III from J. G. Partlow, Director, IP/IE, subject: Assessment of Implementation of the NRC Inspection Program by Region III at Byron Unit 2 Station. (23 pages)

Items 18 through 22 are copies of the same memo to multiple addressees in Region I, II, III, IV and V. The enclosures to each memo are different.

18. 6/6/86 T. Thomas E. Murley, Region I, from James M. Taylor, subject: Assessment of Region I Performance. (20 pages)
19. 6/6/86 To J. Nelson Grace, Region II from James M. Taylor, subject: Assessment of Region II Performance. (19 pages)
20. 6/6/86 To James G. Keppler, Region III from James M. Taylor, subject: Assessment of Region III Performance. (19 pages)
21. 6/6/86 To Robert D. Martin, Region IV, from James M. Taylor, subject: Assessment of Region IV Performance. (19 pages)

APPENDIX A  
(Continued)

RECORDS MAINTAINED IN THE PDR UNDER THE ABOVE REQUEST NUMBER

22. 6/6/86 To John B. Martin, Region V from James M. Taylor,  
subject: Assessment of Region V Performance. (18 pages)

Items 23 through 28 are copies of the same memo to multiple addressees in Region I, II, III, IV, and V. The enclosures to each record are different.

23. 2/11/87 Memo to Division and Staff Directors, Region I from  
Division and Staff Directors, IE, subject: Integrated  
Interim Regional Assessment. (Concurrence copy (1 page)  
The enclosure to this record is a duplicate of the enclosure  
to record #24 in this appendix.)
24. 2/11/87 Memo to Division and Staff Directors, Region I from  
Division and Staff Directors, IE,, subject: Integrated  
Interim Regional Assessment. (11 pages)
25. 2/11/87 Memo to Division and Staff Directors, Region II from  
Division and Staff Directors, IE, subject: Integrated  
Interim Regional Assessment. (12 pages)
26. 2/11/37 Memo to Division and Staff Directors, Region III from  
Division and Staff Directors, IE, subject: Integrated  
Interim Regional Assessment. (12 pages)
27. 2/11/87 Memo to Division and Staff Directors, Region IV from  
Division and Staff Directors, IE, subject: Integrated  
Interim Regional Assessment. (10 pages)
28. 2/11/87 Memo to Division and Staff Directors, Region V from  
Division and Staff Directors, IE, subject: Integrated  
Interim Regional Assessment. (9 pages)

DOC-SEARCH ASSOCIATES  
P.O. Box 7  
Cabin John, MD 20818

December 23, 1987

Director  
Division of Rules and Records  
US Nuclear Regulatory Commission  
Washington, D.C. 20555

FREEDOM OF INFORMATION  
ACT REQUEST

FOIA-87-866  
Rec'd 12-28-87

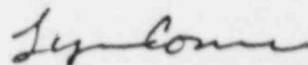
Dear Sir:

Pursuant to the Freedom of Information Act would you please place the following documents in the Public Document Room:

Office of Inspection and Enforcement Regional Assessments (I believe these are done annually) and rankings by Region in the area of construction inspection activities and any supporting clarification and documentation of these rankings, from 1982 to the present.

Thank you.

Sincerely,



Lynn Connor

8804280143 LP.

May 31, 1984

MEMORANDUM FOR: Richard W. Starostecki, Director  
 Division of Project and Resident Programs, Region I

FROM: J. Nelson Grace, Director  
 Division of Quality Assurance, Safeguards,  
 and Inspection Programs  
 Office of Inspection and Enforcement

SUBJECT: ASSESSMENT OF IMPLEMENTATION OF REGIONAL INSPECTION  
 PROGRAM FOR REACTOR CONSTRUCTION

The enclosed assessment report is based upon a CAI inspection conducted by IE at the Nine Mile Point facility. I would appreciate your comments, if any, by June 6, if possible.

ORIGINAL FILED BY:  
 JAMES G. PARTLOW *JGP*

J. Nelson Grace, Director  
 Division of Quality Assurance, Safeguards,  
 and Inspection Programs  
 Office of Inspection and Enforcement

Enclosure:  
 Assessment Report

DISTRIBUTION:

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- RHeishman
- ABBeach
- JTaylor

*A*  
 IE/RCPB  
 RHeishman  
 5/31/84

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## REGIONAL CONSTRUCTION INSPECTION PROGRAM ASSESSMENT - NMP-2 (REGION I)

An NRC Construction Appraisal Team (CAT) inspection was performed in November - December, 1983 for the Nine Mile Point Station, Unit 2 (NMP-2) at Scriba, New York. As part of this inspection, records of the NRC Region I inspection program were reviewed to identify those portions of the construction program that were being performed. The results of this review indicated that the construction inspection program was generally being satisfactorily implemented at NMP-2, considering the current construction status. Approximately 1200 man-hours of direct inspection effort was performed by NRC Region I each year during 1982 and 1983. This amount of inspection effort is typical of NRC inspection time expended for a construction site which does not have significant problems.

A number of the deficiencies identified during the CAT inspection had been previously identified at least in part by the regional inspection program, particularly with regard to the Applicant's Quality Assurance program. These findings included QA program deficiencies identified by a Regional Inspection Team in 1981 which indicated "an inappropriate and ineffectively executed QA program." The NRC CAT inspection discovered an audit program that was not fully effective in problems related to the applicant's procurement QA program that involved materials and equipment that were installed and did not comply with purchase documents.

In addition, several deficiencies were identified by the Regional program regarding the Applicant's corrective action programs. While evidence that some progress had been made related to these corrective action system deficiencies, it now appears, based on the results of the CAT effort, that more actions should have been taken with regard to the ineffectiveness of the Applicant's QA program. However, the results of the CAT inspection is supportive of the Region's earlier findings in this area and now provides the Region with the basis for pursuing more vigorous licensee corrective actions.

Several problems were identified by the NRC CAT in the Electrical and Instrumentation Construction area. The most significant problem identified in this area involved vendor wiring in the Power Generation Control Complex (PGCC). Similar discrepancies were identified by NRC Region I prior to the CAT involving the PGCC installation; however, the applicant had not fully implemented adequate actions to the NRC identified concerns. Other problems in the electrical area were basically reflective of a quality control program that was not effective in preventing problems as construction progressed: a weakness also previously identified by NRC Region I.

No significant problems were identified by the NRC CAT in the Civil and Structural area. The Team noted during its review that several significant findings were identified by NRC Region I in this area. Results of the CAT inspection indicate that the Region had aggressively monitored activities in this area, and that the applicant had taken adequate corrective actions to the identified findings. With regard to the Mechanical Construction area, again most of the problems identified reflected a quality control program that was not effective as construction progressed.

Several management meetings with the applicant had been held by NRC Region I to review problems identified involving the piping and pipe support contractor, ITT Grinnell. It was evident to the Team that corrective actions had been initiated; however, discrepancies were identified which indicated more corrective actions were necessary. Similar deficiencies were identified with regard to Reactor Controls, Incorporated activities. These findings by the NRC CAT inspection appear to complement previous NRC Region I findings in these areas.

The Welding and Nondestructive Examination area is an area where Region I may have been somewhat deficient in their inspection program; specifically, more attention should have been devoted to the review of ITT Grinnell radiographs. A review of inspection reports indicate that a minimum amount of inspection effort was applied to this area, problems had been previously identified by the applicant involving enhancement of radiographs [reported in accordance with 10 CFR 50.55(e)]. However, the NRC CAT does recognize that this program is still at an early stage where many of the radiographs have not completed the entire review process.

Regional Inspection Reports were written to the appropriate depth and scope. Findings were properly addressed and assessed in accordance with their effect on public health and safety.

A system for tracking and closeout of open items was being effectively utilized. Regional management involvement with the construction inspection program was evident from the Section Chief through the Regional Administrator. The resident inspector was knowledgeable of the inspection program and was very helpful to the CAT in their activities.



May 31, 1984

MEMORANDUM FOR: Charles E. Norelius, Director  
 Division of Project and Resident Programs, Region III

FROM: J. Nelson Grace, Director  
 Division of Quality Assurance, Safeguards,  
 and Inspection Programs  
 Office of Inspection and Enforcement

SUBJECT: ASSESSMENT OF IMPLEMENTATION OF REGIONAL INSPECTION  
 PROGRAM FOR REACTOR CONSTRUCTION

The enclosed assessment report is based upon a CAT inspection conducted by IE at the Perry facility. I would appreciate your comments, if any, by June 6, if possible.

ORIGINAL SIGNED BY:  
 JAMES U. PARTLOW *JUP*

J. Nelson Grace, Director  
 Division of Quality Assurance, Safeguards,  
 and Inspection Programs  
 Office of Inspection and Enforcement

Enclosure:  
 Assessment Report

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 JGPartlow:esp  
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 IE:DR/QASIP  
 JNGrace  
 5/3/84

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## REGIONAL CONSTRUCTION INSPECTION PROGRAM ASSESSMENT - PERRY (REGION III)

An NRC Construction Appraisal Team (CAT) inspection was performed in August-September, 1983 for the Perry Nuclear Power Plant Units 1 and 2 (PNPP) at Perry, Ohio. As part of this inspection, records of the NRC Region III inspection program were reviewed to identify those portions of the construction program that were being performed. The results of this review indicated that the construction inspection program was being satisfactorily implemented at PNPP, considering the current construction status. Approximately 2000 man-hours of direct inspection effort was performed by NRC Region III each year during 1981 and 1982. This amount of inspection effort is typical of NRC inspection time expended for a construction site which does not have significant problems.

A number of the deficiencies identified during the CAT inspection had been previously identified at least in part by regional inspection program, particularly with regard to the Applicant's Quality Assurance program. The NRC CAT noted that findings had been identified regarding QA program deficiencies. These had been identified by Region III early in the construction process. The NRC CAT inspection discovered a Quality Assurance program that demonstrated an aggressive attitude in the identification of problems through the applicant's project organization. This was further reflected by the applicant's management involvement at the PNPP site.

Many of the problems identified by the NRC CAT inspectors at PNPP were typical of problems experienced at other facilities. Many of these problems had been previously identified by the applicant's project organization. Timely management attention was being given to findings identified by both the NRC CAT inspectors and the PNPP project organization. Thus, this is indicative of appropriate corrective actions taken to earlier identified program deficiencies that have been effectively assessed and monitored by Region III. Some problems were identified by the NRC CAT in the Electrical and Instrumentation Construction area. The more significant problems identified in this area involved quality procedural contracts for barrier installations in the Power Generation Control Complex (PGCC) and raceway installations which had received quality inspections that did not satisfy separation requirements. Another problem in the electrical area was identified where sketches were used to install conduit and conduit supports in the Unit 1 containment drywell area without appropriate document controls. Similar problems to these had been previously identified by the NRC Region III inspection program.

No significant problems were identified by the NRC CAT in the Civil and Structural area. However, a concern was identified involving the installation of numerous concrete anchor bolts in the drywell wall. The number of intended installations, and the real potential for cracking of the drywell wall as a result of normal, transient, and accident loadings lead the NRC CAT to question the ability of the drywell to maintain the specified leaktightness throughout to service lifetime. With regard to the Mechanical Construction area, most of the problems identified involved the quality control inspection and the program "as-built" verification program for piping and pipe supports/restraints. These programs did not ensure that installed items conformed to design requirements. Again, similar isolated instances had been identified by Region III.

In general, welding and nondestructive examination reviewed by the NRC CAT exhibited work performed in accordance with requirements. This is reflective both of an effective program established by the applicant and effective monitoring by NRC Region III. Some problems were found, however, in the applicant's welder qualification program.

Regional Inspection Reports were written to the appropriate depth and scope. Findings were properly addressed and assessed in accordance with their effect on public health and safety.

A system for tracking and closeout of open items was being effectively utilized. Regional management involvement with the construction inspection program was evident from the Section Chief through the Regional Administrator. The resident inspector was knowledgeable of the inspection program and was very helpful to the CAT in their activities.