

Title: COMANCHE PEAK STEAM ELECTRIC STATION

ALLEGED FALSIFICATION OF COATINGS QUALITY CONTROL TRAINING RECORDS

Licensee:

Texas Utilities Generating Company
2001 Bryan Tower
Dallas, Texas 75201

Case Number: Q4-84-045

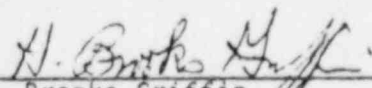
Report Date: December 3, 1985

Control Office: OI:RIV

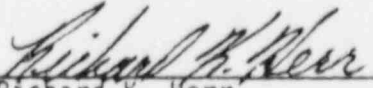
Status: Closed Inquiry

Reported by:

Approved by:



H. Brooks Griffin
Investigator, OIFO:RIV



Richard K. Herr
Director, OIFO:RIV

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PDR FOIA
HARRY84-487 PDR

WARNING

The attached document/report has not been reviewed pursuant to 10 C.F.R. §2.790(a) exemptions nor has any exempt material been deleted. Do not disseminate or discuss its contents outside NRC. Treat as "OFFICIAL USE ONLY."

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DETAILS OF INQUIRY

Purpose of Inquiry

This inquiry was initiated to determine whether QC inspector recertification records for certain coatings QC inspectors at the Comanche Peak Steam Electric Station had been falsified by a QC supervisor.

Background

During August 1984, Bryan HODGSON, a Brookhaven contract employee participating as a member of the NRC's Comanche Peak Technical Review Team (TRT), reviewed a sampling of Level I QC inspector recertification records which indicated that coatings QC inspectors had taken oral examinations for their recertification. HODGSON subsequently interviewed three coatings QC inspectors who testified they had not taken oral examinations for their recertification.

HODGSON interviewed Carly KRISHER, the QC supervisor who had signed the recertification records which indicated that oral examinations had been given to the QC inspectors. HODGSON said KRISHER confirmed that he (KRISHER) had signed the recertifications. HODGSON said KRISHER also testified that the coatings QC inspectors had not taken oral examinations. HODGSON said that KRISHER said the inspectors' recertification was based on his evaluation of their individual job performance.

The TRT Project Manager referred this information to the NRC Office of Investigations as possible falsification of QC training records.

Review of Supplemental Safety Evaluation Report (SSER) 9

The Comanche Peak SSER 9 issued by the TRT in March 1985, addressed Level I QC inspector recertifications. Pages M-122 through M-124 summarized the TRT's findings. Paragraph 4 on page M-124 stated as follows:

The TRT evaluated the process of Level I inspector recertification to determine how the proficiency of inspectors was maintained. The TRT reviewed approximately eight completed recertification forms, which showed that written, oral, or practical recertification examinations had been given. However, the TRT found no supporting evidence that written, oral, or practical examinations had actually been given for inspector recertification. The TRT found that recertification consists of an informal evaluation by the responsible QC supervisor, based on personal knowledge and supplemented by information from the responsible lead inspector.

Interview with Robert SPANGLER, TUGCO Assistant QA Manager and Robert SCOTT, TUGCO Vendor Compliance Supervisor

On November 25, 1985, SPANGLER and SCOTT were interviewed (Exhibit 1). SPANGLER and SCOTT said the site procedures authorized the QC supervisor to recertify the coatings QC inspectors based on their job performance. SPANGLER and SCOTT indicated the recertification form did not clearly reflect that the recertification was based on a subjective evaluation by the QC supervisor.

Review of Inspector Recertification Form

On November 25, 1985, during the interview of SPANGLER and SCOTT, site procedure CP-QP-2.1 with the attached inspector recertification form was reviewed. Whereas, the procedure mentioned oral, written, or practical examinations for recertification, the recertification form only referenced oral and written examinations and did not include practical examinations.

Interview with M. G. KRISHER, Brown & Root QC Supervisor

On November 26, 1985, KRISHER was telephonically interviewed (Exhibit 2). KRISHER, the QC supervisor who signed the coatings QC inspectors' recertifications which indicated that oral examinations had been given, said he considered his daily conversations with the inspectors as a form of examination. KRISHER said site procedures authorized him to recertify the inspectors based on his evaluation of their work. KRISHER denied that he intended to falsify the recertification records or deceive the NRC.

Closure Information

The QC supervisor signed the recertification records required by the site procedures. The procedures authorized the QC supervisor to recertify the coatings QC inspectors on a practical examination basis. The recertification record did not clearly reflect that the recertification was based on a subjective evaluation of the inspectors' work. The QC supervisor did not falsify the recertification records, but rather erred in documenting his evaluation.

LIST OF EXHIBITS

<u>Exhibit No.</u>	<u>Description</u>
1	Report of Interview with SPANGLER and SCOTT, November 25, 1985
2	Report of Interview with KRISHER, November 26, 1985

Report of Interview
With
Robert SPANGLER, TUGCO Assistant QA Manager, and
Robert SCOTT, TUGCO Vendor Compliance Supervisor

On November 25, 1985, SPANGLER and SCOTT were interviewed by NRC Investigator H. Brooks GRIFFIN regarding their knowledge of Comanche Peak site procedures for recertifying QC inspectors as it related to the possible falsification of coating QC inspector recertifications. SPANGLER and SCOTT reviewed site procedure CP-QP-2.1 which related to the training and certification of Quality Control personnel.

SPANGLER said the procedure allowed for recertification tests for Level I QC inspectors to be oral, written, or practical. SPANGLER indicated that CP-QP-2.1 was consistent with the requirements of ANSI/ASME N45.2.6 and that revision 16 included an attachment which is an inspector recertification form. SPANGLER said that if an inspector has actively performed related inspections within the past twelve months, the QC supervisor has the authority by procedure to recertify the inspector without actual testing. SPANGLER indicated that most testing for recertification is for personnel who have not been active in those inspections for a period of time. SPANGLER speculated that M. G. "Curly" KRISHER, the coating QC supervisor at the time the TRT was performing its review, could have considered periodic conversations with his QC inspectors as compliance with the requirement to reevaluate the inspectors' performance for recertification.

SCOTT said the recertification form attached to the procedure was not a "good" form. SCOTT said he was not aware of how KRISHER completed the form, but said that if KRISHER recorded that oral examinations had been given and the inspectors testified that the oral exams had not been given, then KRISHER may have erred.

SPANGLER and SCOTT both expressed the opinion that although KRISHER had the authority to recertify the inspectors without a test, they understood why the QC supervisor's signature indicating an oral examination had been given might have misled the TRT representatives.

DATE PREPARED IN DRAFT FROM NOTES
TAKEN DURING INTERVIEW:

November 27, 1985

Report of Interview
With
M.G. "Curly" KRISHER

On November 26, 1985, KRISHER, a Brown & Root QC supervisor at the Comanche Peak Steam Electric Station, was telephonically interviewed by NRC Investigator H. Brooks GRIFFIN. KRISHER was questioned as to whether he recalled being interviewed by a TRT representative named HODGSON regarding his signature on coatings QC inspector recertifications. KRISHER said he did not specifically recall discussing the recertifications with HODGSON, but said he recalled discussing the subject with various TRT representatives on several occasions.

When KRISHER was asked for an explanation as to why the coatings inspectors' recertification records indicated they had taken oral exams, KRISHER said he considered his daily conversations with the inspectors to be a form of exam. KRISHER said he recertified the inspectors based on his evaluation of their work and his conversations with them. KRISHER said that site procedures authorized him to recertify the inspectors based on his evaluation of their performance. KRISHER denied that he had intended to falsify the recertification records or to deceive the NRC.

DATE PREPARED IN DRAFT FROM NOTES
TAKEN DURING INTERVIEW:

November 28, 1985



NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

TRANSMITTAL SHEET - REGION IV

DATE: 12/3/85

MESSAGE TO: Bill Hutchison

TELECOPY NUMBER: 8-492-7142

VERIFICATION NUMBER: 8-492-7246 (4386)

NUMBER OF PAGES 6 PLUS INSTRUCTION SHEET

MESSAGE FROM: R. K. Herr

CONTACT: Herr

SPECIAL INSTRUCTIONS/ATTACHMENT(S):

Per R. Fortuna's request
Q4-84-045 report attached, Rev. 1

Notified J. Hunt of fax @ 8:50
Again at 2:15pm Rev. 1

Autodi Scap

Brooks Griffin

I gave you this
info over the phone
on Friday (10/5)

4-
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Input from Bryan Hodson (T&T) 573-2874/m

We talked to approximately 10 QC Inspectors
in the coatings area and all of them
said that they were not examined for
their certification ~~as~~ as OJT instructors
~~or~~ or for their recertification as Level 1
inspectors even though their training
records document the fact that an
oral exam was given.

The QC Supervisor M.G. (Curly) Kischer
said that no exams were given, but
that the inspector's certification or
recertification was based on the
individual's performance.

Appears to be a falsification issue
that you may want to investigate.

release

I9

TX-4262

August 21, 1984

QUESTIONS RELATIVE TO ALLEGATION NO. 33

b, 7c + 7d



Assignment Date: September 1983 to

- QI-QP-11.4-1/11.4-5 (Certified 05/06/82, L)
- QI-QP-11.4-23/11.4-24 (Certified 05/06/82, L)
- QI-QP-11.4-10 (Certified 05/14/82, Level I)
- QI-QP-11.4-26/11.4-27 (Certified 01/03/84, L)
- CP-QP-11.4/Daughter Inst. (Certified 06/07/84, L)
- QI-QP-11.4-29 (Certified 07/12/84, Level II)

b, 7c + 7d



Assignment Date: June 1984 to P

- QI-QP-11.4-1/11.4-5 (Certified 01/24/83 Level I)
- QI-QP-11.4-10 (Certified 01/24/83 Level I)
- QI-QP-11.4-23/11.4-24 (Certified 01/24/83, L)
- QI-QP-11.4-26/11.4-27 (Certified 01/03/84, L)
- QI-QP-11.4-29 (Certified 03/28/84, Level I)
- CP-QP-11.4/Daughter Inst. (Certified 06/07/84, L)

b, 7c + 7d



Assignment Date: January 1984 to

- QI-QP-11.4-23/11.4-24 (Certified 07/26/83, L)
- QI-QP-11.4-1/11.4-5 (Certified 08/05/83, Level I)
- QI-QP-11.4-26 (Certified 01/03/84, Letter)
- CP-QP-11.4/Daughter Inst. (Certified 05/17/84, L)
- QI-QP-11.4-29 (Certified 07/12/84, Level II)

Information in this record was compiled in accordance with the provisions of the Freedom of Information Act, exemptions *b, 7c + 7d*

FOIA- 94-487 J-1

FOIA-84-487

DL

b, 7c + 7d Public