

D-10

MAY 18 1988

Docket No. 50-254  
Docket No. 50-265

Commonwealth Edison Company  
ATTN: Mr. Cordell Reed  
Senior Vice President  
Post Office Box 767  
Chicago, IL 60690

Gentlemen:

The NRC has concluded its inspection and investigation in regard to an allegation that was made concerning a contractor's performance at your Quad Cities Station. Attached is a summary of the investigation conducted regarding the allegation which we are forwarding for your information. The technical issues of this allegation were resolved by Commonwealth Edison Company and reviewed by the NRC as documented in Inspection Reports No. 50-254/82-06(DRP); No. 50-265/82-07(DRP).

Although apparent wrongdoing was found on the part of your contractor, the Department of Justice determined that prosecution was not warranted. Since prosecution is not being pursued, it has been decided not to expend any further investigative resources on this matter. Contrary to the final paragraph of the summary which states that the investigation continues until other leads are completed, this allegation is closed. Region III has reexamined the inspection and investigation findings and has determined that no further action by Commonwealth Edison is necessary because the subject contractor is no longer onsite and the technical issues have been resolved.

In a telephone call between R. Lerch of this office and H. Bliss of your staff the content of the attached summary was reviewed and it was agreed that it did not contain any proprietary information. Therefore, in accordance with 10 CFR 2.790 of the Commissioner's regulations, a copy of this letter and the attachment will be placed in the NRC Public Document Room.

We will gladly discuss any questions you have concerning this matter.

Sincerely,

**ORIGINAL SIGNED BY E. G. GREENMAN**

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PDR ADOCK 05000254  
Q DCD

Edward G. Greenman, Director  
Division of Reactor Projects

Attachment: As stated

See Attached Distribution

RIII  
Lerch/jaw

RIII  
Forney

no  
RIII  
for Weil  
5/17

RIII  
Pawlik  
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RIII  
Greenman  
5/18

JEET  
IESA

Distribution

cc w/attachment:  
H. Bliss, Nuclear  
Licensing Manager  
R. L. Bax, Plant Manager  
DCD/DCB (RIDS)  
Licensing Fee Management Branch  
Resident Inspector, RIII  
Richard Hubbard  
J. W. McCaffrey, Chief, Public  
Utilities Division

### Summary

In February 1982, a Level III Nondestructive Examiner (NDE) discovered that his signature had been used without his authorization on Barclay International Ltd. NDE Certificates of Qualification and NDE Examination Answer Sheets. The Certificates of Qualification and Examination Answer Sheets were submitted by Barclay International of Midland, MI. to Commonwealth Edison Company's (CECo) Quality Assurance representatives in conjunction with NDE services performed at Quad Cities Unit 2 in January 1982. The NDE work at Quad Cities concerned cracks in portions of the reactor water clean-up system within the Unit 2 dry well.

It was in a conversation with the CECo QA supervisor that the NDE Level III Examiner found out that his signature had been used without his authorization on Barclay's NDE Certificates of Qualification and NDE Examinations as the Examining Official. As a consequence, the NDE Level III Examiner, through his attorney, wrote a letter to NRC's Region III Administrator stating that his signature had been used without his authorization on the Barclay NDE certification documents for Quad Cities. Relatedly, the CECo QA Supervisor notified the NRC of this fact and redid the NDE welds performed by Barclay.

In November/December 1981 and January 1982, the NDE Level III Examiner had assisted Barclay in the formation of their NDE program, more specifically, the Quality Assurance Manuals and Quality Control Procedures. The NDE Level III Examiner did this with the intent of joining Barclay as their Director of Non-destructive Examination. The NDE Level III Examiner had authorized his keylined signature (a process whereby a photostatic copy of signatures can be transposed from one document to another) to only be printed on Barclay's Quality Assurance Manuals and Procedures Manual.

On January 16, 1982, the NDE Level III Examiner was invited by Barclay's then Director of Quality Assurance to assist Barclay in performing, under contract to General Electric, the NDE services at Quad Cities on January 18, 1982. The NDE Level III Examiner declined this offer because the Barclay Quality Assurance Manuals and Procedures had not been finalized and the 24 hour period to perform the necessary examinations and certifications of the Barclay personnel was not sufficient.

The NDE Level III Examiner was shown by NRC the Barclay Certificates of Qualification and Examinations that contained his signature as the examining Barclay official. The NDE Level III Examiner confirmed that his keylined signature was affixed to the NDE Certificates of Qualification and that this was unauthorized by him. The NDE Level III Examiner also confirmed that someone had signed his name on the Barclay NDE Examination Sheets as the examining official and that this was also done without his authorization.

The then Barclay Director of Quality Assurance stated that he prepared the Barclay NDE Certificates of Qualification for those individuals on the Barclay inspection team, knowing that the NDE Level III Examiner's keylined signature was on the Certificates as the Examining Official. The then Director of Quality Assurance stated that he did this because he did not think the NDE Level III Examiner would mind since they worked together, were friends and the NDE Level III Examiner's keylined signature was already on other Barclay manuals and documents. The then Director of Quality Assurance stated that the NDE Level III Examiner was officially listed as Barclay's NDE Level III Examiner.

The then Barclay Director of Quality Assurance also stated that he performed the NDE certification examinations for those Barclay officials assigned to do the Quad Cities project. The then Director of Quality Assurance stated that he affixed the signature of the NDE Level III Examiner on one of the Answer Sheets. He did this for continuity's sake since one other Barclay Answer Sheet already contained the keylined signature of the NDE Level III Examiner. However, a review of the examination answer sheets revealed that none of the NDE Level III Examiner signatures on these documents are his keylined signature. All of these signatures do appear to be the same, indicating the possibility that the signature of the NDE Level III Examiner was affixed by the same person.

The NDE Level III Examiner stated that he has never conducted any NDE examinations of Barclay personnel and has never received any certification examinations from Barclay. He stated that he has never received any certificates of qualification attesting to such certification. However, Barclay documents had been prepared by the then Director of Quality Assurance attesting that he had certified the NDE Level III Examiner in Ultrasonic and Penetrant Testing.

The investigation of this allegation continues in a pending status until other investigative leads concerning Barclay and the unauthorized use of the signature of the Level III Examiner can be completed.