

1. Allegation Category: QA/QC 2, Document Control
2. Allegation Number: AQ-99 and AQ-136
3. Characterization: It is alleged that authorized nuclear inspectors (ANIs) accepted documentation which they knew was deficient and contained flaws (AQ-99) and that the ANIs may not be qualified (AQ-136).
4. Assessment of Safety Significance: The Comanche Peak Steam Electric Station (CPSES) Final Safety Analysis Report (FSAR), paragraph 17.1.7, and 10 CFR Part 50, Appendix B, require that sufficient records be maintained to furnish documented evidence of activities affecting quality. The ASME Code, subsection NA 5200, "Duties of Inspectors," paragraph NA 5251 requires that ANIs review the qualification records of the manufacturer or installer. The NRC Technical Review Team (TRT) interviewed ANIs, quality assurance/quality control (QA/QC) managers, and documentation reviewers to determine what types of documentation reviews they performed.

These interviews confirmed that CPSES documents received at least three independent reviews (one by Brown & Root, one from the N-5 group, and one by the ANIs). The applicable procedures provide that deficiencies in the packages were to be identified for correction in accordance with the certification deficiency list from the ANIs to Texas Utilities Electric Company (TUEC). Section 20 of the Brown & Root (B&R) quality assurance manual describes the relationship between the ANIs and Hartford Steam Boiler Inspection & Insurance Company (HSB) at CPSES. The ANIs, who are trained and certified by HSB, use HSB's Form 939, Special Inspection Services (SIS), to document problems encountered when monitoring the CPSES QA program. The TRT reviewed 12 Form 939s and verified that these monitoring reports were used as a basis for correcting problems in the QA program.


In order to verify the adequacy of the ANI Documentation Review, the TRT reviewed ten record packages for safety-related systems. The TRT identified only one deficiency. The number of the receiving inspection report identified in NCR 14396 was shown as "05825," when it actually was "05835." During the TRT's review, the NCR was reopened and this clerical error was corrected.

To assess the allegation that ANIs may not be qualified (AQ-136), the TRT determined by reviewing a sample of ANI certifications that the ANIs were tested, qualified, and certified in accordance with ASME Code requirements. Further, the TRT interviewed QA/QC managers, ANIs, the ANI coordinator, and other personnel associated with documentation reviews and verified that ANIs had passed the tests required by ASME code.

5. Conclusion and Staff Positions: Based on its review of applicable documentation and on interviews with TUEC personnel, the TRT concludes that the allegation that ANIs accepted flawed packages knowing they contained deficient documentation (AQ-99) cannot be substantiated. Although the TRT did identify a clerical error in one package, adequate documentation was found to verify the actual identity of the material. Based on a review of ANI certifications and interviews with personnel involved, the TRT concludes that ANIs were qualified (AQ-136). Therefore, this allegation could not be substantiated.

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The AQ-99 concerns and issues came from an unidentified GAP source. Accordingly, no closeout interview were conducted. For AQ-136, the TRT attempted to telephone the alleged, whose telephone had been disconnected. The TRT will mail its findings to the alleged's last known address.

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7. Attachments: None.

Reference Documents:

1. Applicable Documentation - FW-1-RB-04-5, FW1-018-706-C72K, NCR9118SR3, S1-2-RB-13-4, CS-1-SB-032, CC-2-SB-042ITT1, BR-1-SB-05 Spool 1Q3, BR-1-SB-004 Spool 1Q3, BR-1-SB-006, and MS-1-SB-050, interview 8/23-24/84 NCRs M-2698, M-2701, M-2704, M-2708, M-2713, M-2716, M-2737, M-4974, M-9787, M-9797, M-13450, and M-14396
2. Hartford Steam Boiler, SIS record for monitoring QA/QC programs, No. 317, dated February 6, 1984.
3. A-53 interview of August 24, 1984.
4. GAP, handwritten list, April 1984.
5. Form 939, Hartford Steam Boiler Inspection & Insurance Co., numbered 341, 339A, 334, 332, 319, 313, 304, 380, 377, 371, 368, and 365.

8. This statement prepared by:

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Technical Reviewer

6/6/85
Date

Reviewed by:

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6-7-85
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