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NOV 26 1984

DO NOT DISCLOSE

Thank you very much for allowing our technical reviewers the opportunity to discuss with you our preliminary findings regarding your concerns about the Comanche Peak facility on [November 15, 1984.] Enclosed for your review and comment is a copy of the transcript of the November 15 interview which was conducted at the Comanche Peak site.

Should you have any questions, please contact myself, or Mr. J.J. Zudans of my staff by calling collect on (301) 492-7000.

Sincerely,

Vincent S. Noonan
Project Director for
Comanche Peak

Enclosure: As stated

JFC :TRT :TRT:PD :
NAME :JJZudans:pf :VNoonan :
DATE :11/26/84 :11/26/84 :

OFFICIAL RECORD COPY

FOIA-85-59

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PDR FOIA
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I have information that I wish to provide in confidence to the U. S. Nuclear Regulatory Commission (NRC). I request an express pledge of confidentiality as a condition of providing this information to the NRC. I will not provide this information voluntarily to the NRC without such confidentiality being extended to me.

It is my understanding, consistent with its legal obligations, the NRC, by agreeing to this confidentiality, will adhere to the following conditions:

- (1) The NRC will not identify me by name or personal identifier in any NRC initiated document, conversation, or communication released to the public which relates directly to the information provided by me. I understand the term "public release" to encompass any distribution outside of the NRC with the exception of other public agencies which may require this information in furtherance of their responsibilities under law or public trust.
- (2) The NRC will disclose my identity within the NRC only to the extent required for the conduct of NRC related activities.
- (3) During the course of the inquiry or investigation the NRC will also make every effort consistent with the investigative needs of the Commission to avoid actions which would clearly be expected to result in the disclosure of my identity to persons subsequently contacted by the NRC. AT a later stage I understand that even though the NRC will make every reasonable effort to protect my identity, my identification could be compelled by orders or subpoenas issued by courts of law, hearing boards, or similar legal entities. In such cases, the basis for granting this promise of confidentiality and any other relevant facts will be communicated to the authority ordering the disclosure in an effort to maintain my confidentiality. If this effort proves unsuccessful, a representative of the NRC will attempt to inform me of any such action before disclosing my identity.

I also understand that the NRC will consider me to have waived my right to confidentiality if I take any action that may be reasonably expected to disclose my identity. I further understand that the NRC will consider me to have waived my rights to confidentiality if I provide (or have previously provided) information to any other party that contradicts the information that I provided to the NRC or if circumstances indicate that I am intentionally providing false information to the NRC.

Other Conditions: (if any) Confidentiality pertains to technical interview of September 17, 1984, between Technical Review Team and C. C. Randall.

I have read and fully understand the contents of this agreement. I agree with its provisions.

Date

Signature of source of information
Typed or Printed Name and Address

Agreed to on behalf of the US Nuclear Regulatory Commission

Date

Signature
Typed or Printed Name and Title

Revision 1.

FOIA-85-59

P/44



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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Thanks for meeting with the NRC Technical Review Team (TRT) on [redacted] and discussing your concern that related to qualification of authorized nuclear inspectors. The TRT designated your concern as AQ-136 for record keeping purposes. They have investigated it thoroughly, and the results of their investigation are attached.

We tried to call you to provide feedback on our findings, but your telephone had been disconnected. Therefore, we are sending this written report to your last known address.

Sincerely,

Vincent S. Noonan, Director
Comanche Peak Project

Enclosure: As stated

cc: M.E. Kline

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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.

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.

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.

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