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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

March 29, 1985

MEMORANDUM FOR: R. F. Warnick, Chief, Projects Branch 1
C. Weil, Investigation Coordinator

FROM: L. McGregor, SRI Braidwood
R. Schulz, SRI Braidwood

SUBJECT: QUALITY CONTROL ALLEGATIONS FROM L. K.
COMSTOCK INSPECTORS

On March 29, 1984 at approximately 08:15 hours, six quality control inspectors from L. K. Comstock walked into the NRC Braidwood office with numerous allegations which "effect" the quality of work being accomplished by the electrical contractor.

The meeting began with the resident inspector advising these men of the right to remain anonymous and if they choose not to the NRC would like to have their names, phone number or address in order to obtain further information and/or to advise them of the results of this meeting. The six individuals gave the following information:

Inspector X: We were going to have a lot of people come over but we figured it was better to have a small number. We have 109 people there now and all are about to walk if conditions remain the same.

Inspector X, who came to the NRC with allegations on March 13, 1985, said: My supervisor said to me - "You should close them" (ICRs) (normal route is through engineering) "out and be done with the thing." He said "I should evaluate it myself and close it out". said "you know what engineering is going to write and what the disposition will be so close it out". I said "That's not my function." said "No wonder we have such a back log of documents you won't evaluate them or close them out". I said "I have to follow my procedure - It's not my decision to close out ICR's or NCR's." said "I can put you in the vault or whatever and make you do it all". came back to my desk and said "At times you make me so pissed off that if beating was legal you would be dead" I have several

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witnesses to this statement. I didn't agree with the man but he meant what he said. He has jumped on my ass before - he flies off - just like that - he has done it many times before. The biggest thing is this is not the first time and everybody knows about it, but nothing is ever done. He () is not certified in my area and he is telling me what to do and my Lead is not certified so I am stuck in the middle so far as procedures go. I gave the NRC these problems March 13, 1985 and I don't know what is being done about it.

doesn't want to admit he is wrong, which he was - dead wrong and I didn't agree with the man - its' always been an Engineering function when and ICR or NCR is involved so I don't know where he got the idea I should close them out. He has jumped on my ass before - he has always been wrong - what do you expect, the man isn't qualified and yet he is giving orders to inspectors on things he doesn't know anything about - areas where he is dead wrong. It is done just to get the paper work completed so the numbers look good.

Another Individual: One of the biggest things is this isn't the first time he done this and we are getting tired of this shit. I know of at least five guys that he has jumped on and nothing gets done - they just give him a new title or transfer him to another area - they have cut his responsibility down to four areas, yet he is only certified in one of those four areas and is still telling inspectors what they should do. Why is he threatening me with other things - he is telling me what I have to do - he is not certified in my area - he doesn't even have a background in calibration. I know he got out of there (an inspector removed from his job) - he was railroaded out. It wasn't fault because the department was messed up - nobody was certified in that area. had a grudge against so he got him moved out. They have to do something about this guy - know they have taken some of his power away - I don't know if he is holding that against people or because he has lost files there or what.

They got leads now - new leads, and I could walk up to them - except for two guys and ask them a question in their area and they cannot answer it. They are getting in a bunch of new people and making them Leads - NRC why is that? Because they will do what they are

told to do - sign what needs to be signed and get the NCR's or ICR cleared away. This is so because the new people are under a 90 day period of surveillance and could get fired at any time. They want to keep their job - who doesn't. These people are closing out NCR's and they don't even know what the hell they mean. They have no idea that there is a disposition needed on them and they are just signing them off. Our Leads were more or less told in a meeting last Friday that as long as our numbers stay down (the numbers of NCR's or ICR's they generate) they (the inspectors) won't be evaluated. If you don't keep them down to a fair level then you will go back on eight hours - you will lose your overtime and they will jump all over your ass.

This is not one area but in all areas. They are going through out status now (numbers of inspections completed and number of NCRs or ICRs written) they are always interested in numbers - not quality - in fact we had a guy written up last week because he didn't have enough numbers. The quality first or whatever you call it sucks - It's CECO working for CECO and all this bullshit reporting anything hasn't done a damn bit of good. I have not seen one improvement since it started.

We were going to take 50 guys and walk over here and do nothing until something was done about it. I was in a room - I started doing inspections - I started writing up NCRs - cable pans - the welds were bad. Then I started on configuration. I started to find many problems and writing up NCRs so they threw me out. They don't want somebody that will do the inspection they want someone to sign the paper. They went and sent five engineers up to that same room and they did every cable hanger and didn't find one problem - not one - no deficiencies. They are as-built walk downs. They make the problem fit the as built condition so it doesn't look like any problems exist. We have done - I don't know - one hundred and some odd hangers this past week on a walk down - probably a hundred - all but one or two are no good.

One supervisor who was not certified in my area wanted me to close out several of my ICRs and I refused to do it and so I got a disposition from engineering. [] said "We know what's going to happen in this area - why don't you just close them out".

They are going through our status reports now and the word is out now that they are going to weed out three inspectors and that what they are basing it on is the number and not the quality.

NRC: Are the new people, the people who get the NCRs or ICRs completed, getting the 10 hours or overtime?

Individual: Yes, they are getting bought-off - they are going straight to the vault closing the documents out - hangers might not even be there. Another craft may have cut it down and this guy is saying "accept as is" and the hanger is lying on the ground.

NRC: Do you men find any problems with the craft - problems of intimidations or harassment of any kind in the field?

Individual: No, we never have any problems at all - There are a few inspectors claim they have problems - but I think its mostly a personality conflict.

The new people are afraid of [] because of the 90 day period - I have had a couple of people (the new people) tell me we are with you but we can't do anything until our 90 days are up. There are approximately 40 or 50 new people.

I can show you time sheets if you want to know the truth - how many guys are working Saturday, Sunday working at home and getting paid because they have suction power or whatever you want to call it. We have been training these guys. The easiest way to do it is to walk into the office and ask them how many certs (certifications) do you have and ask him can he accurately do one? For example, [] asked our Lead if she could get some cable pulling going because she is going on nights. She asked if she could do some actual inspections so she could catch on. She just got certified last week. He told her no, she has 40 hours of training and they are going to throw her on night shift with no practical experience in cable pulling. These new people don't even know where the work points are.

I have bitched to CECO about the engineers (L. K. Comstock has only 6 actual engineers) completing the NCR's with "use as is" I must have over 1,000 NCR and only 5 or 6 have had actual rework. I have seen a cable pan voided on an NCR. This person passed 93 cable pan hangers with 1,114 welds and all these welds were accepted. These 93 cable hangers were completed in one day. They had a guy from QA assigned here for approximately two months who was closing ICRs. QA doesn't do Level II inspections in the field. How is this guy going to do a QA audit on himself? They have now pulled him out - he was working directly at the vault.

Inspector A: I was told flat out Friday that we are making these people (new hires) the Leads because they will get the job done. That's what my supervisor said - you know what kind and amount of paper work they will complete.

Inspector B: I have been inspecting for 15 years and this is the first nuclear job I have seen where quantity is first - not quality.

Inspector C: I was a Lead at one time and give it up because of the intimidation. I was present one day when [redacted] was using extreme profanity towards one of the inspectors. This inspector asked to please stop it but [redacted] refused and kept on. His attitude is how can I hang you and not how can I help you.

Inspector D: My Lead (Mr. A) told me unless my production is increased overtime would not be warranted. I also witnessed [redacted] trying to order an inspector ([redacted]) to sign off an ICR. [redacted] said it is being addressed - sign it. (he pointed his finger in the inspectors face and said "sign it off - sign it off - sign it off - sign it off - now").

Inspector E: It is true we have intimidation from more than one supervisor or Lead.

Inspector F: I have had so many run ins with [redacted]. [redacted] demanded that I should write up an electrician and if I didn't I would lose my qualification. It had something to do with items not up to par or not correct on a drawing.

Inspector G: I am now being watched all the time - I must work to an hourly schedule of specific jobs for each hour. They are keeping book so they can fire me.

All of the inspector's stated that they thought quantity was

first and quality work or inspections were secondary.

The resident inspector called the region for a conference call when the second group of inspectors came into the office. The resident inspectors feel that the region should send an inspector to the site to interview these Q.C. inspectors individually and to investigate NCR-1616 and ICR 2900 which the inspectors claim have been inappropriately dispositioned. It appears at first glance with the information we have received that a shut down or some other aggressive action of the electrical work may be necessary to establish the quality of past work and the quality of the ongoing work. The lack of action by CECO QA in this area needs to be addressed along with CECO managements slowness or inability to take corrective action. The resident inspectors appraised CECO management last fall of the problems in L. K Comstock Quality Control Department.

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ATTACHMENT

*Indicates these inspectors first approached the NRC and later returned for the noon meeting.