

5-30-85

REVIEW OF WOLF CREEK Q1 INVESTIGATIONS

Opened: 3-26-84

Closed: 11-10-84

CASE NUMBER: QCI-2007 (1)

TITLE: Alleged Falsification of TMI Inspection Records BY TMI Engineer

SYNOPSIS OF CASE/CONCERN(S):

- Q1 Report cites appropriate regulations relating to allegation.
- Q1 investigation obtained dates suspect entered Protected Area (WCS) through Security Dept. site access records. Determined suspect was in Protected Area (where his inspections are performed) only 9 times in 8 weeks.
- Q1 Conclusion: "Based on evidence of few access entries and large time gap -- between some entries it is reasonable to conclude this engineer was not consistently verifying surface cleanliness in accordance with procedure."
- Remedial/Corrective Action
"No corrective action is recommended because no Q1 records are generated or affected by a lack of inspection on the engineers part."

EVALUATION OF Q1 FINDINGS/DISPOSITION:

AGREE

DISAGREE

PLAIN:

Q1's conclusion and corrective action allow a substantiated allegation regarding falsification of records and violation of various procedures to go uncorrected. Also, because these records do not affect QA, no further investigation was performed.

- Suspects Inspection Records should have been compared to his dates of access to prove, beyond a reasonable doubt, to prove falsification and procedural violations (individuals are regularly terminated for less than this)
- The Q1 conclusion condones this illegal activity.

8706160569 870605
PDR FOIA
BROSIUS84-291 PDR

4-85-011, 22

5/29/85
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OPEN 7-18-84
CLOSED 11-3-84

REVIEW OF WOLF CREEK Q1 INVESTIGATIONS

(3)
↓
SE NUMBER: QCI 84-79T (2)
TITLE: Alleged I & H OF A DIC QC Inspector

SYNOPSIS OF CASE/CONCERN(S):

Allegor reported to Q1 that she was intimidated and harassed and subsequently fired. The Q1 report indicates a review of allegor's "personal file disclosed no harassment or intimidation." Her performance evaluations were good and no excessive absenteeism or tardiness shown on records. Also no reprimands. Q1 reported interviews of her supervisors (2), one of whom stated she wasn't harassed and refused to comment further. The other said she had a problem with tardiness and absenteeism. The Q1 report stated allegor provided no "specific instance ... or example of harassment."

Q1 conclusion: I & H not substantiated

EVALUATION OF Q1 FINDINGS/DISPOSITION:

AGREE

DISAGREE

PLAIN:

- ① Q1 did not resolve their reported conflict in testimony of one supervisor and her personnel record.
- ② Q1 allowed the other supervisor to deny cooperation with investigation, which should have aroused suspicion.
- ③ A review of the Q1 investigator's notes ~~disclosed~~ of his interview with allegor disclosed she provided 4 instances wherein she believed she was harassed, intimidated and threatened.
 - > These notes directly conflict with info placed in the Q1 report
 - > This inaccurate and falsely reported info is inexcusable!
 - > These notes additionally provide a basis for additional investigation which was not done in order to fairly evaluate the allegor's claim

4-85-011-23

5/29/85
6.0

OPEN 7-12-84
CLOSED 11-3-84

REVIEW OF WOLF CREEK Q1 INVESTIGATIONS

ASE NUMBER: QCI 84-71

ITLE: Alleged that K&E Start-Up Group Middle Mgmt Aware of Use & Sale
OF DRUGS ON SITE WITHIN START-UP ORGANIZATION

YNOPSIS OF CASE/CONCERN(S):

- > no Q1 report prepared
- > letter transferring only above allegation to Security Chief on 7/12/84
notes Q1 file closed.
- > Response from Security states Start-up mgmt apprised of
allegation - states that due to lack of info no in-depth
investigation conducted.

EVALUATION OF Q1 FINDINGS/DISPOSITION:

AGREE

DISAGREE

PLAIN:

- > no notes of interview of ~~allegor~~
- > ~~allegor~~s name and address in file (no phone)
- > inadequate interview of ~~allegor~~
- > no development of quality impact

VII

4-85-011-24

I

30 MAY 84
ME

REVIEW OF WOLF CREEK Q1 INVESTIGATIONS

OPENED: 6-5-84
CLOSED: 10-15-84

CASE NUMBER: QCI 84-47T(3)

CONCERNS 1+2 SUPERVISORS INEPT
1. Keeping Const. QC
From Doing JOB

TITLE: Mgt asked individual not to contact NRC

SYNOPSIS OF CASE/CONCERN(S):

NIC Allega ~~states~~ he was told by 2 Supervisors NOT TO CALL NRC
BECAUSE IT WOULD PUT 2000 PEOPLE OUT OF WORK. Allega SAID HE WAS
UNWARE OF ANYTHING THAT WOULD SHUT DOWN PLANT OTHER THAN BAO Mgt.
INVESTIGATIVE PLAN (IKE) ONLY PLAN WAS TO INTERVIEW (SUSPECT)

EVALUATION OF Q1 FINDINGS/DISPOSITION:

AGREE

DISAGREE

EXPLAIN:

CONCERNS 1+2 ~~Q1~~ Q1 TRANSMISSION (1+2) TO Mgt. FOR DISPOSITION AND
REPORTED CONCERNS UNSUBSTANTIATED.

#3 ALTHOUGH 3 IS RECORDED BY DURING EXIT INTERVIEW NOTICE
IKE'S INVESTIGATIVE PLAN IS VOID OF RESOLUTION. Q1 PRINT OUT SHOWS
#3 AS UNSUBSTANTIATED → THERE IS NO REPORT DEALING WITH THIS ISSUE
AND IT APPEARS NO INVESTIGATION OF ANY KIND.

7-2-85
RECORDED

Allega

[REDACTED]

(START-UP SUPPORT) → REC'D BY

[REDACTED] (COMPLAINT REC'D 6-5-84)

ASSIGNED TO ISSINGHAI

Allega TOLD BY [REDACTED] "NOT TO CALL NRC BECAUSE IT WOULD PUT 2000 PEOPLE
OUT OF WORK. ~~Allega~~ Allega WAS UNAWARE OF ANYTHING THAT WOULD SHUT DOWN THE PLANT OTHER THAN
BAO Mgt." AS RECORDED BY (6-5-84)

4-85-011

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III

REVIEW OF WOLF CREEK Q1 INVESTIGATION

opened: 3-28-84

closed: 1-23-85

CASE NUMBER: QCI-84-14 (19)

TITLE: I+H CONCERNS OVER CHRONOLOGICAL LOG ENTRIES

SYNOPSIS OF CASE/CONCERN(S):

Alleged brought 21 concerns to Q1 of which 20 were of a technical nature and 13 were substantiated.

Q15/R^{Q1} I STATES H+I CONCERN NOT SUBSTANTIATED AFTER QUOTING A LETTER (CONFIDENTIAL) TO [] FROM [] ON SUBJECT. WAS DEFINED BY (QACFR AT 24).

A CONFIDENTIAL INTER OFFICE CORRESPONDENCE FROM D. THORP (CCH FOR OLT) TO: [] IS - CONTAINED ON THE VERY LAST SECTION OF A SUBSTANTIAL FILE WHICH DOCUMENTS A PROFESSIONAL Q1 INVESTIGATION () WHICH SUBSTANTIATED THE DISCRIMINATION (H+I) CONCERN. THE MEMO IS DATED AUG 6, 1984 ENTITLED "NOTIFICATION OF H/I OF STARTUP EMPLOYEE KEN YANUZIS, QUALITY FIRST A6 QCI 84-14"

VALUATION OF Q1 FINDINGS/DISPOSITION:

AGREE

DISAGREE

EXPLAIN:

AN OBJECTIVE, ^{thorough} INVESTIGATION CONDUCTED BY Q1 WAS REPORTED UNDER A CONFIDENTIAL MEMO AS SUBSTANTIATED H+I WAS SUBSEQUENTLY REPORTED ON A Q1 ROI AS UNSUBSTANTIATED AFTER INPUT FROM LEGAL COUNSEL.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INVESTIGATIONS FIELD OFFICE, REGION IV
611 RYAN PLAZA DRIVE, SUITE 1001
DALLAS, TEXAS 76011

October 28, 1985

MEMORANDUM FOR: Robert D. Martin
Regional Administrator, Region IV

FROM: Richard K. Herr, Director *RKH*
Office of Investigations, Region IV

SUBJECT: KANSAS GAS AND ELECTRIC COMPANY
(WOLF CREEK) Q1 PROGRAM

During the course of investigating Cases 4-84-026, 4-85-011, 4-85-012 and 4-85-013, which involved allegations previously investigated by the Q1 department at Wolf Creek, interviews were conducted by Q1 with former investigators of the KG&E Q1 program.

These Q1 investigators expressed concern over the KG&E management of the Q1 program in that matters were perceived to be covered up and, therefore, pertinent information was not reaching the NRC. Copies of their statements are attached for your review. In addition to the above investigators' comments, a number of alleged and/or witnesses interviewed as a result of the above cases provided information which was consistent with the concerns expressed by the former Q1 investigators.

I request that you advise this office if the concerns raised in the attached statements are considered by Region IV to be of sufficient magnitude and impact to warrant the initiation of an OI investigation into the Q1 program itself and KG&E management to determine if the purpose of the program was to circumvent information from reaching the NRC.

Attachments:
As stated

4-85-011 - 7



UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INVESTIGATIONS FIELD OFFICE, REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

STATEMENT

Affiant _____ Street _____
City _____ State _____ Zip _____
Location _____ Telephone No.: AC ()
MA

I, _____, hereby make the following voluntary statement to M. EMERSON, who has identified himself to me as an Investigator with the U.S. Nuclear Regulatory Commission. I make this statement freely with no threats or promises of reward having been made to me.

1 MR EMERSON IS WRITING THIS STATEMENT FOR ME AS WE
2 DISCUSS ITS CONTENTS. I HAVE WORKED FOR TECHNICAL METALS
3 INC. (TMI) AT THE _____
4 FROM _____ UNTIL _____ I WAS A CLEANING
5 (PIPE) FOREMAN. MY PEOPLE
6 WOULD "WORK UP" A PIPE CLEANING PACKAGE ON THE VARIOUS
7 NON-Q PIPING AND I WOULD INSPECT THEIR WORK. I THEN
8 TOOK THE PACKAGE TO _____ WHO WAS
9 _____ WAS BY
10 TMI REGULATION, SUSPECTED TO VISUALLY CHECK THE NON-Q
11 PIPE FOR CLEANLINESS. I DID REPORT _____ TO THE
12 VARIOUS PIPE JOBS BEFORE THE NEED FOR SECURITY CLEARANCE
13 BECAME EFFECTIVE. ON FOUR OR FIVE OCCASIONS I GAVE
14 THE CLEANING PACKAGES AND JUST SIGNED THEM
15 OFF AS IF I HAD VISUALLY INSPECTED THE NON-Q
16 & NON-Q PIPE. I TOLD _____ TWO OR THREE TIMES
17 SHOULD VISUALLY INSPECT THE VARIOUS PIPE JOBS AND
18 TOLD ME I DIDN'T HAVE THE TIME. I DID NOT REPORT
19 THIS FALSIFICATION TO ANY ONE. MY FEELINGS AT THAT TIME WERE
20 THAT I HAD TREATED THE PIPE INSPECTION JOBS AS A WORK
21 SO I KNEW THESE JOBS WERE DONE RIGHT. THE _____
22 INSPECTION WAS AN EXTRA STEP, BY TMI REGULATION, WHICH I
23 FELT WAS UNNEEDED.

I WILL ATTEMPT TO FIND THE FILES FALSIFIED BY _____
AND REPORT THESE FINDINGS TO MR EMERSON OF THE NRC.

Initials of Person Making Statement _____

4-85-011

EXHIBIT ()

-20



UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INVESTIGATIONS FIELD OFFICE, REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

STATEMENT

(Continued)

I DON'T KNOW IF ANYONE IN TMI MANAGEMENT KNOW
WAS FALSIFYING THE "SPEEDY MEMOS" USED TO DOCUMENT
THE VISUAL INSPECTION BY THE ().

I have READ the foregoing statement consisting of 2 handwritten/~~typed~~
~~ages~~. I have made and initialed any necessary corrections and have signed my
INITIALS at the bottom of each page. I fully understand and have discussed the
statement with Investigator M. Emerson. This statement is
true to the best of my knowledge and belief.

Signature: _____

Name _____

Subscribed and sworn to before me this 20 day of Aug 1985,
1984 at Orlando Walt Cook

Investigator: _____

Authority: Section 161c AEA 1954 as amended

Witness: _____

Name/Title _____

Initials of Person Making Statement* _____

EXHIBIT ()
Page 2 of 2



UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INVESTIGATIONS FIELD OFFICE, REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

STATEMENT

Affiant	Street
Location	City State Zip
	Telephone No. AC

I, M. EMERSON, hereby make the following voluntary statement to M. EMERSON, who has identified himself to me as an Investigator with the U.S. Nuclear Regulatory Commission. I make this statement freely with no threats or promises of reward having been made to me.

1 Mr. Emerson is ^{of} ~~the~~ ^{writing} ~~typing~~ this statement for me as we
2 discussed its contents. I previously worked at Wolf
3 Creek for Tech Metals Inc. (TMI)
4 . Starting at about _____ until
5 I left I worked as _____ and one of my
6 duties was to visually verify the exterior cleanliness of
7 non-Q pipe prior to insulation by Owens Corning Co.
8 We were very busy during this time and several pipes
9 had to be reclaimed and re-inspected because of various
10 foul-ups.
11 Emerson ~~has~~ ^{has} shown me seven (7) copies of "speedy memos",
12 signed by me, between ~~the~~ ^{the} _____ and _____ which
13 document my visual inspection of these non-Q pipe areas.
14 I admit that I did not always visually inspect these
15 non-Q pipes. I signed several of these speedy memo
16 at my desk in violation of TMI procedures.
17 I don't remember exactly how many of these forms
18 I signed at my desk.
19 I do not know of any other acts of falsification
20 within TMI or at Wolf Creek.
21 The procedure to visually inspect the exterior of the various
22 non-Q pipe (cleanliness) was a needed procedure and I admit
23 I violated this procedure.

Initials of Person Making Statement _____

4-85-011 -19
EXHIBIT ()



UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INVESTIGATIONS FIELD OFFICE, REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

STATEMENT

(Continued)

I have read the foregoing statement consisting of 2 handwritten/~~typed~~ pages. I have made and initialed any necessary corrections and have signed my initials at the bottom of each page. I fully understand and have discussed the statement with Investigator M. EMERSON. This statement is the truth to the best of my knowledge and belief.

Signature: X

Name

Subscribed and sworn to before me this 29 day of Aug 1985,
~~1984~~ at

Investigator: [Signature]

Authority: ~~Section~~ Section 161c AEA 1954 as amended

Witness

Name/Title

Initials of Person Making Statement RE

FYH/TCT / 1



UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INVESTIGATIONS FIELD OFFICE, REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

STATEMENT

Q4-85-011

Affiant _____ Street _____
_____ City _____ State _____ Zip _____
Location _____ Telephone No.: AC _____

I, _____, hereby make the following voluntary statement to Mr. Emerson and J. Kinot, who has identified himself to me as an Investigator with the U.S. Nuclear Regulatory Commission. I make this statement freely with no threats or promises of reward having been made to me.

Mr. Emerson is writing this statement for me as we discuss its contents. I previously worked at the Wolf Creek Nuclear Generating Plant (Wolf Creek) between _____ and _____. I worked for Technical Metals Inc. (TMI) initially as a _____. During the _____ of my employment I worked in the _____ as an _____. During this time (_____) I sat near _____.

I suspected _____ was violating some procedure because _____ would sign off pipe cleaning packages at _____ desk and not verify any information in the field. I witnessed TMI cleaning foreman _____ bring _____ cleaning documents that _____ should have visually verified. _____ signed these documents while seated at _____ desk. I actually witnessed this falsification occur between 5 and 10 times. _____ would tell _____ "It's ready" and _____ would sign. I once told _____ was supposed to actually inspect the external pipe (_____) cleanliness instead of taking _____ word. _____ stated "There is no way I'll get caught." On another occasion I again told _____ should visually inspect the pipe and _____ stated "There is no ^{any} way they can catch me, I'll run your own business." And "I'll take _____" word." The documents signed at _____ desk do not have non-a pipe that had been recleaned and would have a "RC-1 or RC-2" after the release number.

Initials of Person Making Statement _____

A-85-001-18
EXHIBIT ()



UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INVESTIGATIONS FIELD OFFICE, REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

STATEMENT

(Continued)

I REPORTED MY CONCERN TO K6+E Q1 AND THREE MONTHS
LATER I RECEIVED A LETTER STATING MY CONCERN WAS
SUBSTANTIATED.

I have read the foregoing statement consisting of 2 handwritten/~~typed~~ pages. I have made and initialed any necessary corrections and have signed my initials at the bottom of each page. I fully understand and have discussed the statement with Investigators Emerson + Kint. This statement is the truth to the best of my knowledge and belief.

Signature: X

Name

Subscribed and sworn to before me this 13 day of Aug 1985,
1985 at _____

Investigator: [Signature]

Authority: Section 161c AEA 1954 as amended

Witness: _____

Name/Title

Initials of Person Making Statement _____

EXHIBIT ()

OPEN: 3-8-85
CLOSED: 3-22-85

5/29/85
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REVIEW OF WOLF CREEK Q1 INVESTIGATIONS

VI

CASE NUMBER: QCI 85-195 W (2)

TITLE: Individual has access to Level II QC Receiving Exam

SYNOPSIS OF CASE/CONCERN(S):

An allegation reported to ~~Q1~~ Q1 an individual (report doesn't identify this person by job title or work location) was seen with the rough draft of the QC Receiving Exam. Allegor also stated this individual may have given ~~Q1~~ questions & answers to test to another inspector (not identified).

EVALUATION OF Q1 FINDINGS/DISPOSITION:

AGREE

DISAGREE

PLAIN:

- The Q1 investigation report states the allegation couldn't be substantiated and is therefore without merit.
- Investigation identified 3 persons interviewed — not the Subject
 - > Investigation disclosed rough draft is subject to changes in questions prior to final draft being issued.
 - > Investigation states 100 questions for exam are entered into computer and computer then randomly prepares Tests of 50 questions each — no two test containing the same question.
 - > Report states no evidence found that the Subject ever gave copies of draft questions to other personnel.

Problems Found:

- ① subject not interviewed
- ② Report doesn't state whether Subject ever took the exam.
- ③ Report disclosed no effort to determine whether rough draft of questions for QC Receiving exam underwent change before final draft.

4-85-011

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④ No review of Test scores conducted to determine whether unusually high scores were made on this exam in recent past

⑤ No interviews conducted of inspectors who might have knowledge of Subject sharing any information on test with others.

VI Conclusion

Some work was done, however investigation is obviously a very superficial one.

5/29/85

REVIEW OF WOLF CREEK Q1 INVESTIGATIONS

opened: 6-21-84

closed: 6-28-84

ASE NUMBER: QCI 84-58 (1)

TITLE: Allegation of Drug and Alcohol Abuse on Site

V
WAY HANDLED
"COVER-UP"

SYNOPSIS OF CASE/CONCERN(S):

- > Allegers concern included her providing information which could be used to identify two (2) suspected drug users
- > Allegation was forwarded to KGE Project Manager and Q1 File closed.
- > memo from Project Manager stated efforts to identify these persons unproductive - consider concern unsubstantiated

EVALUATION OF Q1 FINDINGS/DISPOSITION:

AGREE

DISAGREE

PLAIN:

- ① Notes in Q1 File from interview of allegor contains names of several other persons who ^{allegedly} abuse drugs & alcohol on site which are not contained in report to Project Manager
- ② Brevity of notes lead reviewer to believe allegor not properly debriefed concerning knowledge of these activities.
- ③ Allegers name, address & phone # in file - could have talked w/ allegor later to obtain additional identifying data.
- ④ Don't believe Project Manager's efforts industrious enough to properly resolve issue referred to him.

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Q4-85-011

5-30-85

SD

REVIEW OF WOLF CREEK Q1 INVESTIGATIONS

opened: 3-26-84
closed: 11-10-84

CASE NUMBER: QCI-202T (1)

TITLE: Alleged. Falsification of TMI Inspection Records BY TMI Engineer

SYNOPSIS OF CASE/CONCERN(S):

Q1 Report cites appropriate regulations relating to allegation.

Q1 investigation obtained dates suspect entered Protected Area (WGS) through Security Dept. site access records. Determined suspect was in Protected Area (where his inspections are performed) only 9 times in 8 weeks.

Q1 Conclusion: "Based on evidence of few access entries and large time gap between some entries it is reasonable to conclude this engineer was not consistently verifying surface cleanliness in accordance with procedure."

Remedial/Corrective Action

"No corrective action is recommended because no Q1 records are generated or affected by a lack of inspection on the engineer's part."

VALUATION OF Q1 FINDINGS/DISPOSITION: AGREE

DISAGREE

XPLAIN:

Q1's conclusion and corrective action allow a substantiated allegation regarding falsification of records and violations of various procedures to go uncorrected.

Also, because these records do not affect QA, no further investigation was performed.

→ Suspects Inspection Records should have been compared to his dates of access to prove, beyond a reasonable doubt, to prove falsification and procedural violations (individuals are regularly terminated for less than this)

→ the Q1 conclusion condones this illegal activity.

4-85-011 -9

TV

5/28/85

REVIEW OF WOLF CREEK Q1 INVESTIGATIONS

APPRO: 8-13-84

LOGED: 8-14-84

CASE NUMBER: QCI 84-103

TITLE: TWO DIC EMPLOYEES ARE BEING CONSIDERED FOR HIRE BY KGE QA WHO ARE ALLEGEDLY DRUG USERS.

SYNOPSIS OF CASE/CONCERN(S):

An allegor reported to Q1 that Two DIC employees being considered for hire by KGE (both identified) are drug users.

- > The file contains a letter to the allegor thanking him for reporting his concerns to Q1 and advising him that his concerns are not quality related. The letter states the matter will be transferred to the appropriate KGE management for resolution.
- > Another letter transfers this matter to the KGE QA Dept. and closes the Q1 file.
- > Lastly a ltr from the KGE QA Mgr to Q1 states one of the individuals was not employed by KGE and the other was. The letter states this individual's performance has, to date (1-4-85), been excellent - therefore the allegation, regarding the individual hired by KGE, is considered, by the QA Mgr, to be without merit.

EVALUATION OF Q1 FINDINGS/DISPOSITION:

AGREE

DISAGREE

PLAIN:

- ① The allegor was not properly interviewed regarding his knowledge of the alleged drug use by the 2 persons
- ② The file does not indicate whether the 2 persons, employed by DIC, were working at WCES or what their job duties were.
- ③ Tom VASH learned these two persons are Engineers, therefore it could be considered likely their duties related to Quality, which is the responsibility of Q1.
- ④ It is inconceivable that Q1 can consider the letter of the KGE QA Manager, which states one of the suspected drug users now works for KGE QA, the last word on a matter which has potential safety impact.

4-85-011-21