U.S. Department of Energy
Office of River Protection
P.O. Box 450, MSIN H6-60
Richland, Washington 99352

04-WTP-234

Mr. J. P. Henschel, Project Director
Bechtel National, Inc.
2435 Stevens Center
Richland, Washington 99352

Dear Mr. Henschel:

CONTRACT NO. DE-AC27-01RV14136 – INSPECTION REPORT A-04-AMWTP-RPPWTP-003 – ON-LOCATION CONSTRUCTION INSPECTION REPORT FOR THE PERIOD JULY 1, 2004, THROUGH SEPTEMBER 30, 2004

This letter forwards the results of the U.S. Department of Energy (DOE), Office of River Protection (ORP) review of Bechtel National, Inc. (BNI) construction performance at the Waste Treatment and Immobilization Plant for the period July 1, 2004, through September 30, 2004. Three Findings were identified; however, no written responses are required (Enclosure 1). Details of the inspection are documented in the inspection report (Enclosure 2).

One Finding concerned industrial health and safety violations by a sub-contractor and was resolved by BNI in an effective and timely manner. Another Finding concerned BNI directing a supplier to use 316 stainless steel with no more then .030% carbon content rather then the Preliminary Safety Analysis Report (PSAR) required use of 316L material. A change to the PSAR was needed to address this issue and BNI has now issued a Safety Evaluation in preparation to make this change. The third Finding concerns BNI's failure to implement its Quality Assurance Manual (QAM) regarding the requirement of the QA Manager to perform inspections. Specifically, the construction field engineering organization was reviewing and approving quality level (QL) radiographs without requiring quality control to perform independent acceptance of these radiographs. Also, ORP understands the results of BNI's QL ultrasonic examinations would be reviewed and approved by field engineering without requiring independent quality control acceptance. Following identification of this Finding, ORP and BNI senior management met on several occasions to discuss and come to an agreement on an acceptable path forward to address this Finding. Enclosure 2 describes the corrective actions agreed to during these meeting to resolve this Finding. BNI senior management is requested to take immediate action to implement these correction actions.

If you have any questions, please contact me, or your staff may call John Eschenberg, WTP Project Manager, (509) 376-3681.

Sincerely,

Roy J. Schepens
Manager

AMWTP:JWM

Enclosures (2)

cc w/encls:
W. R. Spezialetti, BNI

NOTICE OF FINDING

Section C, Standard 7, "Environment, Safety, Quality, and Health," of Contract DE-AC27-01RV14136, dated December 11, 2000, between Bechtel National, Inc. (the Contractor) and the U.S. Department of Energy (DOE), defined the Contractor's responsibilities under the Contract as they are related to conventional non-radiological worker safety and health; radiological, nuclear, and process safety; environmental protection; and quality assurance.

Standard 7, Section (e)(2)(iv) requires BNI to prepare and submit the Safety Analyses Report (SAR) and Section (e)(2)(iii) requires BNI to update the SAR.

Standard 7, Section (e)(3), Q*uality Assurance*, requires the Contractor to develop and implement a quality assurance (QA) program. The QA program is required to be submitted to DOE for approval.

Standard 7, Section (e)(3)(ii)(B) requires the Contractor to implement the requirements of ASME NQA-1, 1989.

NQA-1, 1989, Section II, *Basic Requirements*, item 1, *Organization,* states persons or organizations responsible for assuring activities affecting quality have been correctly performed shall report to a management level such that required authority and organization freedom are provided, including sufficient independence from cost and schedule considerations. Section 10, *Inspections,* further states inspections for acceptance shall be performed by persons other than those who performed or directly supervised the work being inspected.

The Contractor's Quality Assurance Manual (QAM), Revision 5, dated July 15, 2004, contain the policies, which establish the QA requirements for the project. QAM Policy Q-10.1, *Inspection,* states "This policy identifies requirements and responsibilities for specifying, planning, performing, and reporting inspections used to verify the acceptance of items or activities. The inspection process is designed to prevent the inadvertent acceptance and use of nonconforming items."

Standard 7, Section (e)(1)(ii) of the Contract required the Contractor to conform to the DOE regulatory program described in ORP M 440.1-2, *Industrial Health and Safety Oversight Plan for the Waste Treatment Plant Contractor.*

ORP M 440.1-2, Appendix A, Item 12.b. requires the Contractor to comply with Title 29 CFR Part 1926, *Safety and Health Regulations of Construction.*

During inspections of the Contractor performance of construction activities at the Waste Treatment and Immobilization Plant (WTP) from July 1, 2004, through September 30, 2004, the following deficiencies were identified:

1. Preliminary Safety Analyses Report (PSAR), Paragraph 4.3.3.5 states; "The performance criterion [the rate of vessel failure resulting in leakage] is met by designing the vessels to the *ASME Boiler and Pressure Vessel Code, Section VIII,* using fully welded vessels fabricated of 316L stainless steel and with specific provisions to reduce the probability of failure."

   Contrary to the above, Mechanical Systems Data Sheet for Vessel – 24590-PTF-MV-UFP-VSL-00062A, Revision 0, dated October 8, 2003, specified 316 stainless steel with maximum 0.030% carbon as the material to be used for the fabrication of Ultrafilter Permeate Vessel UFP-VSL-00062A.

   Failure of BNI to either require the use of 316L as specified in the approved PSAR or generate a safety evaluation report indicating 316 with a maximum of 0.030% carbon is equivalent to 316L and change the PSAR, is considered a Finding against BNI Contract No. DE-AC27-01RV14136, Section C, Standard 7(e)(2), *Radiological, Nuclear, and Process Safety,* which requires the Contractor develop and implement an integrated standards-based safety management program (Finding A-04-AMWTP-RPPWTP-003-F01.)

2. 29 CFR 1926.451(h), *"Falling object protection,"* allows unprotected scaffolding provided "the area below the scaffold to which objects can fall shall be barricaded, and employees shall not be permitted to enter the hazard area." 29 CFR 1926.550 (a)(19) requires employees to be clear of suspended loads.

   Contrary to the above, two WTP site sub-contract workers were observed on two occasions working underneath unprotected scaffolding while work was being performed on the scaffolding. In addition, a worker working on the scaffolding was observed to be working under a suspended load.

   Failure of the sub-contractor to comply with 29 CFR 1926.451(h) requirements regarding falling object protection and 29 CFR 1926.550 (a)(19) regarding the requirement to keep all employees clear of suspended loads is considered a Finding for failure of the Contractor to implement the Contract requirements contained in ORP M 440.1-2, *Industrial Hygiene and Safety Regulatory Plan for the Waste Treatment Contractor* (A-04-AMWTP-RPPWTP-003-F02.)

3. QAM Policy Q-10.1, Section 6.2.1.B specifically states the QA Manager is responsible for: "Planning, performing, documenting, and reporting inspections and test."

   Contrary to the above, the Contractor-approved field weld record 24590-BOF-FWCL-CON-04-0469, for a weld associated with an underground Low Activity Waste Facility RAD transfer line weld (quality level [QL] piping), based on a quality control (QC) inspector's verification a field engineer reviewed and approved the radiograph, rather then the QC inspector personally reviewing and

accepting the subject radiograph. From discussions with QC personnel, this was a programmatic rather then isolated case in that QC was instructed to accept field engineering's approval of radiographs.

Failure of the quality assurance organization to have qualified personnel review and accept radiographs associated with QL components or equipment is considered a Finding against the requirements of QAM Policy Q-10.1 and does not meet the intent of the American Society of Mechanical Engineers NQA-1 requirement for inspections to be performed by a person or organization independent from cost and schedule considerations, and performed by persons other than those who performed or directly supervised the work being inspected in that field engineering is an integral part of the Contractor's construction organization and often provide direct instructions to welders (Finding A-04-AMWTP-RPPWTP-003-F05.)

BNI either took or committed to take adequate corrective actions, as described in the enclosed inspection report (Enclosure 2) to address the above Findings. Therefore, no written responses to the above Findings are requested.

U.S. DEPARTMENT OF ENERGY
Office of River Protection

INSPECTION:	On-location Inspection Report for the Period July 1, 2004, through September 30, 2004
REPORT NO.:	A-04-AMWTP-RPPWTP-003
FACILITY:	Bechtel National, Inc. (BNI)
LOCATION:	2435 Stevens Center Richland, Washington 99352
DATES:	July 1, 2004, through September 30, 2004
INSPECTORS:	J. McCormick-Barger, Construction Inspection Lead J. Bruggeman, ORP Facility Representative S. Pfaff, ORP Facility Representative B. Harkins, ORP Facility Representative J. Polehn, ES&H Inspector M. Evarts, Team Member D. Wallace, Team Member R. Taylor, Team Member T. Finucane, Team Member
APPROVED BY:	M. Thomas, Operations and Commissioning Team Leader Waste Treatment and Immobilization Plant Project

INSPECTION REPORT

Introduction

During the period July 1, 2004, through September 30, 2004, the U.S. Department of Energy, (DOE), Office of River Protection (ORP), Waste Treatment and Immobilization Plant (WTP) Project conducted inspections of important-to-safety (ITS) and non-ITS (Balance-of-Plant) activities of the construction of the WTP. These inspections were documented on inspection notes and maintained electronically. There were 98 inspections of various construction activities summarized below. Copies of the inspection notes are available upon request.

Significant Observations and Conclusions

- From a supplier site inspection at Northwest Copper Works (NWCW), in Portland Oregon, ORP confirmed NWCW's quality assurance program was adequate to perform the work specified in the Contractor's Purchase Order. Welding and nondestructive examination (NDE) procedures met applicable code requirements and welding personnel qualification records were adequate for the work reviewed. The Contractor's Supplier Quality Verification activities were adequate for the work being performed and well documented. One Finding was identified regarding using 316 stainless steel with a maximum carbon content of .030% vs. using 316L as specified in the PSAR and implied in the Safety Requirements Document (SRD). This Finding is not specifically related to NWCW performance but rather an authorization basis management issue with the Contractor (Finding No. **A-04-AMWTP-RPPWTP-003-F01**). On September 20, 2004, this Finding was closed based on the Contractor issuing Safety Evaluation 24590-WTP-SE-ENS-04-0158. (Inspection Notes 003-01 and 003-84.)

- Sub-contractor unsafe work practices were noted at the water treatment tank fabrication area (water tanks located near the WTP south gate [T-23]). Failure of the sub-contractor to comply with 29 CFR 1926.451(h) requirements regarding falling object protection and 29 CFR 1926.550 (a)(19) regarding the requirement to keep all employees clear of suspended loads was considered a Finding (**A-04-AMWTP-RPPWTP-003-F02**) for failure of the Contractor to implement the Contract requirements contained in ORP M 440.1-2, *Industrial Hygiene and Safety Regulatory Plan for the Waste Treatment Contractor.* During the inspection period the Contractor and sub-contractor took adequate actions to address these unsafe work practices. Based on these actions, this Finding is considered closed. (Inspection Notes 003-36 and 003-45.)

- From another supplier site inspection at Harris Thermal Transfer Products in Portland Oregon, ORP determined the supplier's quality assurance program was generally adequate to perform the work specified in the Contractor's purchase order. Welding and NDE procedures met applicable code requirements and welding personnel qualification records were adequate for the work reviewed. Better supplier quality attention to detail was warranted based on issues identified regarding adequacy of supplier material storage and identification, supplier Quality Control (QC) inspector qualification records, and NDE

subcontractor inspector qualification records. The Contractor's Supplier Quality Verification activities were generally adequate for the work being performed, however, supplier quality verification inspectors should focus a portion of the time spent at supplier locations periodically verifying the suppliers' general Quality Assurance (QA) program elements to ensure the suppliers maintain there facilities in accordance with the requirements specified in their respective QA Manuals (QAM). One Assessment Follow-up Item was assigned to track Harris Thermal Transfer Products actions to issue an acceptable Suspect/Counterfeit Items procedure (**A-04-AMWTP-RPPWTP-003-A03**). (Inspection Note 003-62.)

- The Contractor's Management Assessment of Lab Construction Readiness provided an adequate basis for concluding the Contractor was ready to commence Lab construction. (Inspection Note 003-10.)

- With minor exceptions, Switchgear Building # 87 and the Simulator Building lightning protection systems met the requirements of Underwriters Laboratories (UL) 96A and NFPA 780. Master Certification Labels will be issued by UL after the minor exceptions have been made. (Inspection Note 003-02.)

- The inspector concluded filler metal for Pretreatment Facility (PTF) black cell piping met requirements, and fit-up and welding on nozzle 1 and nozzle 3 of FEP Ejector 00009 were visually acceptable per American Society of Mechanical Engineers (ASME) B 31.3 criteria. (Inspection Notes 003-03 and 003-93.)

- Following rework of Submerged Bed Scrubber (SBS) Condensate Receiver Vessel HOP-VSL-00903 interior welds and vessel surface, the vessel conformed to design and authorization basis requirements. (Inspection Note 003-07.)

- Liner plate associated with PTF Waste Feed Receipt Vessel FRP-VSL-00002A, 2B, 2C, and 2D skirt areas were being installed in accordance with design requirements. (Inspection Notes 003-08, 003-12, 003-25, 003-28, 003-33, and 003-37.)

- Simulator Building fire alarm system testing was being performed in accordance with the Contractor's Acceptance Test Procedure. (Inspection Notes 003-09 and 003-58.)

- PTF Waste Feed Receipt Vessels FRP-VSL-00002A, 2B, 2C and 2D internal pipe assembly bracing and tank shell welds were in accordance with design requirements. (Inspection Notes 003-11, 003-18, 003-19, 003-21, and 003-27.)

- In general, installation of temporary and permanent electrical equipment was good. However, several deficiencies were identified as follows: emergency lighting associated with Cooling Tower Support Building 83S was not feed by the same circuit as normal lighting; an equipment grounding conductor associated with a 400-amp main temporary power disconnect located on general distribution rack PT-GDR-027 was not connected to the grounding electrode as required; a #6 AWG bonding jumper was installed in the 225-

amp Combo Shop panelboard when Table 250.122 required a #4 AWG; Liquid tight flexible metal conduit (480-volt) was installed in concentric knockout in the Combo Shop mini load center without a grounding bushing installed; a grounding conductor for the generator feeding University Mechanical's office trailer was not installed; a Cooling Tower Tyco Valves Control Panel was not listed/labeled; a subcontractor installed 300-volt rated float switch cable in the same enclosure as the 480-volt Basin Heater power connectors (connectors were rated at 600-volts); and a sub-contractor was using the wrong color-coding for three phase service. The above deficiencies were correct prior to the end of the inspection period. (Inspection Notes 003-04, 003-06, 003-13, 003-35, 003-38, 003-44, 003-46, 003-47, 003-48, 003-52, 003-55, 003-61, 003-66, 003-71, 003-77, 003-83, 003-86, and 003-95.)

- During review of in-process electrical work at the Cooling Tower Support Building 83S, National Electrical Code (NEC) violations, or drawing or technical specification errors were identified concerning configuration of motor control centers, height of circuit breakers above the floor, working clearance of panels, size of a ground bus, voltmeter and ammeter scale requirements, and motor control center name plate engraving requirements. Resolution of these issues will be tracked as Assessment Follow-up Item **A-04-AMWTP-RPPWTP-003-A04**. (Inspection Note 003-24.)

- Work packages for Low Activity Waste (LAW) structural steel installations met design and installation requirements. (Inspection Note 003-14.)

- Scaffolding, stairways, and ladders used in the PTF met 29 CFR 1926 requirements. (Inspection Notes 003-15 and 003-16.)

- Flushing, and/or hydrostatic and pneumatic testing of installed pipe continued to meet testing and system technical specification requirements. (Inspection Notes 003-05, 003-17, 003-23, 003-29, 003-32, 003-41, 003-42, 003-56, 003-57, 003-64, 003-76, 003-81, 003-88, 003-90, and 003-91.)

- Concrete for LAW walls 79 and 86, and PTF wall 2-64, 2-63, and basemat 9 were batched, placed, consolidated, tested, and monitored in accordance with engineering specifications and the SRD. One issue was identified regarding signing off a pour card without first indicating placement punchlist items had been closed. Management subsequently verified the punchlist items had been addressed. (Inspection Notes 003-20, 003-40, 003-65, and 003-68.)

- ITS backfilling operations and compaction testing of permanent plant earthwork at elevations 665.78' and 671.22' for the Analytical Laboratory Excavation were performed and documented in accordance with required standards and engineering specifications. (Inspection Notes 003-22 and 003-60.)

- Main structural steel for Building 85 (Steam Plant Facility) was being installed in accordance with the design. One issue was identified regarding the use of ½" A325 bolts

for purlins and grits that may be suspect. The Contractor wrote Construction Deficiency Report 24590-WTP-CDR-CON-04-0104 documenting this condition. (Inspection Note 003-30.)

- Modification of electrical cable tray support 24590-LAW-ER-H00031 at minus 21' elevation in the LAW building, where two pieces of tube steel were welded together using a single groove weld with backing, was performed in accordance with AWS D1.1 and design requirements. (Inspection Note 003-31.)

- Cable pulls routed from motor control center LVE-MCC-83001A to Cooling Tower fan motors CTFM-01 & CTFM-03, consisting of six 1/0 AWG conductors and one #6 equipment grounding conductor, were performed in accordance with established requirements. (Inspection Note 003-34.)

- Environmental Safety and Health sub-contract assessments were not being consistently performed, or documented as required by the assessment procedure. Since October 28, 2003, only one documented sub-contractor noncompliance had been generated and there were only a limited number of documented safety violations in the daily sub-contractor reports (DSR's). Improvements were planned to increase oversight of subcontractors. Although these weaknesses were noted, informal safety oversight by subcontractor coordinators and safety personnel have been observed on numerous occasions. (Inspection Note 003-39.)

- QC was not performing a review of radiographs prior to accepting completed welds. Rather, QC was relying on field welding engineers to perform radiography acceptance and only verified a qualified field welding engineer had accepted the radiography. A Finding against the requirements of QAM Policy Q-10.1 was issue for failure of the quality assurance organization to have qualified personnel review and accept radiographs associated with QL components or equipment. The Contractor's weld inspection program did not meet the intent of the ASME NQA-1 requirement for inspections to be performed by a person or organization independent from cost and schedule considerations, and performed by persons other than those who performed or directly supervised the work being inspected in that field engineering is an integral part of the Contractor's construction organization and often provide direct instructions to welders (Finding **A-04-AMWTP-RPPWTP-003-F05**). (Inspection Note 003-43.)

  ORP and Contractor management discussed this Finding on several occasions. Discussions focused on determining an acceptable path forward that would both address ORP's concerns about compliance with the QAM regarding welding acceptance independence, and at the same time allow the Contractor to staff its QC and Field Welding Engineering organizations in a manner that is cost effective for this project. ORP and Contractor management agreed upon the following corrective actions that, if properly implemented would address this Finding:

- The Contractor will revise QAM Policy Q-09.1 to allow Field Welding Engineering to accept radiograph and UT examinations, provided the individual acceptors are appropriately qualified and fully independent of responsibilities associated with the facility where the accepted welds are located.

- The Contractor will develop procedural guidance clearly detailing this field welding engineering independence requirement. Specifically, field welding engineers, assigned responsibility for one WTP facility, can only accept radiograph and UT examinations from other WTP site facilities. Field welding engineers, not assigned to any specific WTP facility, will maintain independence from the facilities where the accepted welds are located by not providing technical welding assistance to these facilities.

- QC will have both qualified radiograph and UT examination inspectors capable of performing periodic surveillances of welding acceptance activities. QC will initially inspect all radiograph and UT examinations with the intent of reducing this effort to a small periodic sampling, based on acceptable field welding engineer acceptance performance. This QC welding surveillance program will be reflected in a procedure and include verification that field welding engineers are appropriately independent as described above.

Follow-up to verify the actions described above are appropriately implemented will be tracked by the Finding described above.

- Duct supports DS-2A-455 and DS-2A-522 for stainless duct at the minus 21' elevation in the LAW building were being installed in accordance with design requirements. (Inspection Note 003-49.)

- PTF Waste Feed Receipt Vessels D was installed in a safe manner in accordance with applicable engineering and safety requirements. (Inspection Note 003-50.)

- The radiograph for the first automatic weld process for piping on the Process Air System, being fabricated at the south modular slab south of the PT building, was acceptable and the film quality was in accordance with ASME B31.3. (Inspection Note 003-51.)

- Field Weld-04 associated with the 2" S/S Black Cell piping system, line number FRP-ZS00021099, and Field Weld-01 associated with jet pump FRP-EJCTR-00078 and pipe spool PTF-FRP-GV01715099-A, were performed in accordance with ASME B31.3. (Inspection Notes 003-53 and 003-89.)

- Appropriate corrective actions were taken to address an accident where a 12-pack of nitrogen cylinders rolled off a two ton flatbed truck, spilling its contents. One worker suffered a strained a knee when jumping from the truck to avoid contact with the 12-pack. (Inspection Note 003-59.)

- Forms, rebar, and embeds for PTF Slab 20A and LAB C2/C3 base slab were installed in accordance with design and engineering specifications and applicable code requirements. (Inspection Notes 003-63 and 003-78.)

- The lifting and setting of SBS Condensate Vessel HOP-VSL-00904 was adequately performed in accordance with the approved rigging package and procedures. (Inspection Note 003-69.)

- Welding of coaxial piping located between the LAW and PTF was conducted in accordance with design and welding requirements. (Inspection Note 003-70.)

- Materials used to fabricate stainless steel sumps RLD-00040, 41, and 42 for use in the Laboratory C2 Vault, C3 Cell, and C5 Cell met the requirements of the engineering specification and procurement documents. (Inspection Note 003-73.)

- HVAC system testing at the Simulator Building was conducted in accordance with the approved acceptance test procedure. (Inspection Note 003-74.)

- HLW Structural Steel for the minus 21' elevation was being installed in accordance with applicable specifications and design drawings. (Inspection Note 003-75.)

- Grouting of structural steel columns was performed acceptably. (Inspection Notes 003-54 and 003-79.)

- In general, QISI was following its QA program in its day-to-day efforts to perform material testing activities. However, QISI was not adequately controlling its cure room temperatures, and two examples of failure to follow procedures regarding the process of certifying testing personnel was identified. One of the examples, regarding documenting work and education, was of particular concern because it was a repeat observation from the last ORP performed QISI QA program review. In addition, an oven, used for drying fine soils less than No. 200 sieve material, had not been procured or tested to the required standard. These issues were documented and being addressed by the Contractor and QISI. (Inspection Note 003-67.)

- Flowable grout was being produced and placed in accordance with Contractor requirements. (Inspection Note 003-79.)

- The Lab C5 Cell base slab concrete, rebar, and sump were installed in accordance with engineering specification and design drawing requirements. (Inspection Note 003-80.)

- Although some workers assigned to LAW structural steel installations had not signed the current version of the Job Hazards Analysis (JHA), they were adequately aware of the job hazards and the controls specified to address the hazards. The pre-job briefing, including discussing the JHA and Safety Task Analysis Risk Reduction Talk card, was being

adequately implemented for structural steel installation activities. (Inspection Note 003-92.)

- Although one cable was damaged when it was pinched by a roller during cable pulls between Building 87 and 91, the Contractor was conducting the activity in accordance with approved procedures and specifications. Repair or replacement of the damaged cable was being evaluated. (Inspection Note 003-85.)

- The Contractor purchased and installed reinforcement, embeds, and electrical grounding material at the Chiller/Compressor Facility (Building 82) slab placement #1 in accordance with Contractor requirements. (Inspection Note 003-94.)

- Steam Plant Building 85 piping installations were being conducted using specified materials and qualified welders in accordance with approved design and specification requirements. (Inspection Note 003-87.)

- The Contractor and firewater piping system installation sub-contractor took appropriate action to address welding issues associated with firewater piping installations. (Inspection Note 003-97.)

- Except for the three minor deficiencies regarding record errors, a procedural weakness concerning instructions to perform survey instrument functional checks, and an error on an isotope label attached to the gamma camera, the sub-contractor, responsible for performing radiography at the WTP, had an effective radiography safety program that was appropriately implemented and its radiography personnel were adequately trained and knowledgeable. Follow-up on the corrective actions to address the three deficiencies will be tracked as Assessment Follow-up Items (**A-04-AMWTP-RPPWTP-003-A06, -A07, and -A08**). (Inspection Note 003-98.)

- A review of the Health and Safety Plans of both Morse Construction and Intermech, Inc. revealed areas in each that were incompatible with established Contactor standards. Officials of both of these companies have indicated these omissions will be rectified. On-site inspections of the Morse and Intermech work areas showed no obvious safety related problems; however, a similar inspection of the work area of D. S. Purcell Painting, a second tier sub-contractor to Morse Construction, identified two problem areas (i.e., housekeeping and training) that should be addressed. Follow-up to the issues described above will be tracked as an Assessment Follow-up Item (**A-04-AMWTP-RPPWTP-003-A09**). (Inspection Note 003-96.)

- The Contractor conducted an emergency preparedness drill that was well coordinated. Staff performed adequately in their efforts to communicate, and the post-drill critique included good observations and comments. The subsequent drill report reflected these comments and assigned corrective actions as needed. (Inspection Note 003-82.)

List of Assessment Items Opened and Closed,

Opened

A-04-AMWTP-RPPWTP-003-F01	Finding	Follow-up on Contractor actions to address the use of 316 stainless steel with a maximum carbon content of .030% vs. 316L required by the PSAR. (Inspection Note 003-01.)
A-04-AMWTP-RPPWTP-003-F02	Finding	Failure of a subcontractor to comply with the requirements of ORP M440.1-2, *Industrial Hygiene and Safety Regulatory Plan for the Waste Treatment Contractor* (falling object protection and clear of suspended loads). (Inspection Note 003-36.)
A-04-AMWTP-RPPWTP-003-A03	Assessment Follow-up Item	Follow-up on supplier's actions (Harris Thermal Transfer Products) to issue a suspect counterfeit parts procedure. (Inspection Note 003-62.)
A-04-AMWTP-RPPWTP-003-A04	Assessment Follow-up Item	Follow-up on sub-contractor actions to resolve NEC code and specification issues for Cooling Tower Support Building 83S. (Inspection Note 003-24.)
A-04-AMWTP-RPPWTP-003-F05	Finding	Failure of the quality assurance organization to have independent qualified personnel review and accept radiographs associated with QL component or equipment weld acceptance as required by QAM Policy Q-10.1. (Inspection Note 003-43.)
A-04-AMWTP-RPPWTP-003-A06	Assessment Follow-up Item	Follow-up on sub-contractor actions to address 'utilization record' errors associated with radiography activities. (Inspection Note 003-98.)
A-04-AMWTP-RPPWTP-003-A07	Assessment Follow-up Item	Follow-up on sub-contractor actions to revise its Radiation Safety Program procedure to clearly specify survey instrument functional testing requirements. (Inspection Note 003-98.)

A-04-AMWTP-RPPWTP-003-A08	Assessment Follow-up Item	Follow-up on sub-contractor actions to correct the radioactive source label attached to the gamma camera. (Inspection Note 003-98.)
A-04-AMWTP-RPPWTP-003-A09	Assessment Follow-up Item	Follow-up on Contractor and sub-contractor action to correct Industrial Health and Safety issues with sub-contractor IS&H Plans and performance. (Inspection Note 003-96.)

Closed

A-03-AMWTP-RPPWTP-006-F05	Finding	Three examples of a Finding regarding failure to have or follow procedures when procuring structural steel bolting material. (Inspection Note 003-72.)
A-04-AMWTP-RPPWTP-001-A03	Assessment Follow-up Item	Follow-up on Contractor actions to address firewater sprinkler system welder identification marking concerns. (Inspection Note 001-97.)
A-04-AMWTP-RPPWTP-002-F03	Finding	Follow-up on Contractor actions to address Switchgear Building 87 design drawings that result in secondary conductors of panel LVE-PNL-87001B and possibly LVE-PNL-87001A exceeding the NEC 25’ maximum length requirement. (Inspection Note 003-26.)
A-04-AMWTP-RPPWTP-003-F01	Finding	Follow-up on Contractor actions to address the use of 316 stainless steel with a maximum carbon content of .030% vs. 316L required by the PSAR. (Inspection Note 003-84.)
A-04-AMWTP-RPPWTP-003-F02	Finding	Failure of a subcontractor to comply with the requirements of ORP M440.1-2, *Industrial Hygiene and Safety Regulatory Plan for the Waste Treatment Contractor* (falling object protection and clear of suspended loads). (Inspection Note 003-45.)