Washington

November 27, 2002

United States Nuclear Regulatory Commission
Washington, D.C. 20555

ATTN: Document Control Desk

SUBJECT: REPLY TO A NOTICE OF NONCONFORMANCE
NRC OFFICE OF INVESTIGATION (OI) REPORT NO. 2-2001-28 AND NOTICE OF NONCONFORMANCE

REFERENCE: NRC LETTER, SAME SUBJECT, EA-02-220, DATED OCTOBER 28, 2002

Dear Madam or Sir:

This letter is a Reply to a Notice of Nonconformance, which is forwarded in the referenced letter.

THE REASON FOR THE NONCONFORMANCE

Washington Group has investigated the reported nonconformance and determined that the reason for the nonconformance is inadequate guidance provided by the licensee inspection program.

THE BASIS FOR DISPUTING THE NONCONFORMANCE

Washington Group acknowledges and has taken corrective action for the failure of its inspector to stop work controlled by others at such time that the inspector determined the work process instruction to be unclear or confusing. However, it must be noted that the Instructions, Procedures, and Drawings applicable to the work were provided by the licensee, and that the Washington Group Quality System Manual was applicable only to the personnel certification of the inspector assigned to augment the licensee staff..

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER NONCOMPLIANCES

Personnel involved in inspection and surveillance activities have been instructed to exercise their authority to stop customer or vendor processes in the event that they determine that instructions provided by others are unclear, appear to be contradictory or otherwise confusing (see attached).

DATE WHEN CORRECTIVE ACTION WILL BE COMPLETED.

November 27, 2002

cc: Branch Chief
Equipment and Human Performance Branch
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

IE07

510 Carnegie Center Boulevard · Princeton, New Jersey USA 08540

Washington

INTER-OFFICE CORRESPONDENCE

DATE: November 27, 2002

TO: Distribution

FROM. K. Schmidt

LOCATION: Various

LOCATION: Princeton, 02P2

SUBJECT: Nuclear Vendor Inspection/Surveillance Activities

We have recently been advised that the NRC has determined one of our inspectors failed to fully implement the requirements of our Quality System during the performance of a shop inspection surveillance program in late 2000. The occurrence involved an inspection activity for a safety grade pump rebuild which was being performed by an non-nuclear vendor selected by the license (in this instance Florida Power Corp.) WGI was contracted to provide an inspector, who was instructed to follow the FPC inspection program.

In essence your fellow Vendor Surveillance Representative we assigned to function as a seconded employee. This included assuring the inspection plan issued by Florida Power Corp. was fully implemented (understood) prior to issuing an authorization to ship or signing off a FPC Statement of Conformance.

Upon receipt of the pump FPC determined a seal was installed backwards. Internal review of the events determined there were numerous contributing factors, which included confusing instruction/guidance being provided by the licensee. Instructions which should have, but were not sufficiently clarified by our client or challenged by your colleague.

Please be reminded that even though you may be assigned to work in support of a licensee's program, you are still obligated under the WGI QP&ES Quality Program to assure only fully compliant items are authorized to ship. By fully compliant, we mean items that fully meet the client requirements. In the event you find conflicting information or the instructions are unclear you are to request a STOP to the work process and obtain clarification. Also be advised that you should only accept written clarification, following verbal direction with care and caution.

This notice to provided so that you may take the appropriate care and caution in the performance of your duties. Should you have any questions please contact either myself or W. L. Stuckey at 609-720-2052.

K. Schmidt