



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 1000  
ARLINGTON, TEXAS 76012

Central  
files

21 DEC 1979

Docket No. 99900519/79-03

Bechtel Power Corporation  
Gaithersburg Power Division  
Attn: Mr. J. M. Komes  
Vice President and Division Manager  
15740 Shady Grove Road  
Gaithersburg, Maryland 20706

Gentlemen:

Thank you for your letter of October 23, 1979, in response to our letter dated September 24, 1979. The results of our review of your response are as follows:

Deviations A, D, and G

Your response did not address the preventive measures that have been or will be taken to prevent recurrence and the date these measures will be completed. As discussed with your staff in the past, your responses to inspection reports should contain, as a minimum, the following:

1. Corrective Actions

A description of the steps that have been or will be taken to correct the item, the steps that have been or will be taken to assure that similar items do not exist, and the date these actions were or will be completed.

2. Preventive Measures

A description of the steps that have been or will be taken to prevent recurrence of this type deviation and the date these preventive measures were or will be completed.

In both cases the corrective and preventive actions must be capable of being verified by the NRC inspector during a subsequent inspection.

Deviation B

We have no further questions at this time. We will review your corrective action and preventive measures during a future inspection.

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Deviation C

Subsequent to the NRC/QAB letter of September 25, 1977 held discussions with QAB regarding this deviation. The QAB interpretation of ANSI N45.2.11 requirements is that there must be documented evidence of the design review process for design documents, or portions thereof, prior to the release by organizations (materials, stress, physics, mechanical, electrical, concrete, etc.) responsible for the technical content of the document being issued. As a minimum, the signature or initials of those who determine the acceptability of the design should be on the document or on a separate form traceable to the document signifying their acceptance of the document as issued. The above stated position is in agreement and supports our deviation, therefore, please provide us a written statement containing (1) a description of steps that have been or will be taken to correct this item, (2) a description of steps that have been or will be taken to prevent recurrence, and (3) the dates your corrective actions and preventive measures were or will be completed.

Deviation D

As indicated above, your response did not address the preventive measures that have been or will be taken to prevent recurrence and the date these measures were or will be completed. From your response it appears that a typographical error may have been made in the first sentence under Corrective Action i.e. Revision 5 should read Revision 6, please clarify.

Deviation E

Your response accurately describes the inspector's findings concerning this deviation; however, by your own description the deviation exists and remains uncorrected. The project procedure states that your Supplier Document Control Center is to stamp reproducibles provided by suppliers with the SNUPPS Document Review Stamp. Contrary to this procedural requirement acetate reproducibles provided by Westinghouse were not stamped with the SNUPPS Document Review Stamp. Accordingly, please respond to this deviation in the manner described in Deviation A above.

Deviation F.1

The following is a more complete quote from paragraph 7.0 of EDPI-4.49-01: ". . . Following reproduction, the typed original of the technical portion of the specification and appendices will be under the control of the project editor for use in updating of future issues."

The inspector interpreted, "the typed original" as being each typed original that had been reproduced which would have included the current as well as previous versions of the document, however, we accept your interpretation

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of your procedures as meaning only the current revision of the document.

Concerning the specification relative to this deviation, 10466-M-637(Q), the inspector, assisted by Bechtel's representatives, was unable to locate the typed original of any revision of this document including the current Revision 5. If this document was and is in the control of the Project Editor, i.e. in the Project Editor's files, then no deviation exists. During our next inspection we will resolve the apparent disparity between your response and the inspector's findings.

#### Deviation F.2


The specifications noted in this deviation were inadvertently misidentified and should have been as stated in your response, 10466-A-074(Q) and 10466-A-081(Q). Notwithstanding the content of your response, we have re-evaluated this deviation and find that the registered professional engineer (PE) seal appears on both of the identified specifications, in accordance with your procedure and the specific requirements of Subarticle NCA-3255 of Section III of the Boiler and Pressure Vessel Code. However, the PE seal on these documents relates only to Revision 0 and each document has been revised three times since the application of the seal. It does appear that a PE may have dated and initialed the subsequent revisions to these documents, therefore we will pursue the validity of this deviation further during our next inspection.

#### Deviation H

This deviation, in the form presented in our inspection report, does not exist and our records will be revised accordingly. This deviation should have focused more clearly on "distribution and control of revised documents" which will be the subject of a future inspection.

In summary, Deviations A, C, D, E, and G require additional information. Please provide the requested information within twenty (20) days in order that we may complete our review in a timely manner.

Sincerely,

  
Uldis Potapovs, Chief  
Vendor Inspection Branch

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