



June 12, 1979

United States Nuclear Regulator, Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

Attention: Mr. U. Potapovs

Re: Docket Number 99900525/79-01
Response to Notice of Deviation

Gentlemen:

The NRC inspection conducted by Mr. D. G. Anderson, Mr. C. J. Hale and Mr. J. C. Glynn on April 24-27, 1979, resulted in the issuance of a Notice of Deviation with three parts. The Gilbert/Commonwealth response to each item is listed below:

- A. The Notice of Deviation states that written storage procedures for QA records have not been prepared by the Power Engineering Division. To correct this situation all Nuclear Project Managers will revise their Project Manuals to provide clear identification of QA record holders and storage areas.

Written procedures will be developed to address collection, storage and maintenance of QA records. These procedures will either be referenced or included in the revised Project Manuals. Corrective actions will be completed by August 31, 1979.

- B. The second item in the Notice of Deviation deals with access control and security of Power Engineering Division project records. To correct this condition, all nuclear project records will be maintained in locked facilities. A list of personnel authorized to have access to the records shall be maintained. Provisions will be made to limit accessibility of records to only those who are authorized. A sign-out mechanism will be instituted to provide control over removal of records from the record file and to assure timely return. The facility will be kept locked when unattended. These provisions will be included in revisions to Project Manuals or in referenced control procedures and implemented by August 31, 1979.
- C. The third part of the Notice of Deviation pertains to the forwarding of duplicate records to the Records Retention Center. In the Quality Assurance Division, the particular examples cited were records of internal audits not contained in any project records. To correct this deficiency,



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duplicate copies of all internal audit records for all audits conducted since March 1, 1977, will be transmitted to the Records Retention Center by July 31, 1979.

In addition, a review will be conducted of all other records initiated by the Quality Assurance Division. A listing will be prepared, by record type, to be completed by August 31, 1979. This listing will include identification of requirements for duplication of records.

The Notice of Deviation mentioned a similar deviation in Power Engineering Division. While all nuclear projects are committed to a duplicate and remotely located QA record retention system, not all projects are currently committed to use of the Records Retention Center facility. A duly authorized variance to the NQAM is required by the G/C Quality Assurance program for such cases.

To address this situation, as well as other internal audit findings pertaining to QA records, the following corrective actions will be taken:

1. On each nuclear project, a review of the list of project record types will be conducted to identify those records which will be subject to the QA records program.
2. Each list of record types will include clear identification of primary and secondary record holders. These actions will be completed by August 31, 1979.
3. After these steps are accomplished, responsible project personnel will be directed to produce and maintain the required duplicate records. Completion of this extensive activity is anticipated by March 31, 1980.

As discussed during the recent inspection, a reorganization is being implemented at Gilbert/Commonwealth. While not all of the details of this reorganization have been announced, certain aspects of it have a bearing on QA records and preventing recurrence of these deviations. The records management function has been raised to the corporate level. This move will help provide uniform records management policy and implementation. It is also evidence of management's commitment to strengthen and enforce a meaningful records management program in full compliance with regulatory requirements.



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In another significant change, a Corporate Quality Assurance Program Manager has been appointed to assist in making the various manuals and procedures developed by individual divisions form a complete and workable program for the Corporation. These organizational changes, coupled with increased emphasis within our internal audit program, will provide management with improved visibility and control to affect positive change in our records management program.

Very truly yours,

N. R. Barker
General Manager
Quality Assurance Division

HAM/NRB:jl

cc: H. Lorenz
T. M. Demers
W. B. Shields
A. G. Hemmerich