

AUG 6 1979

Distribution:  
Central File  
QAB Projects  
QAB Chron. File  
NRR Reading File  
✓ NRC PDR  
LPDR  
NSIC  
DSkovholt, DPM  
JSpraul, QAB  
FLiederbach, QAB  
JGilray, QAB  
WHaass, QAB

SBryan, IE  
MPeranich, IE  
UPotapovs, Region IV

Mr. R. E. Blaisdell  
Quality Assurance Manager  
Black & Veatch Consulting  
Engineers  
P.O. Box 8495  
Kansas City, MO 64114

Dear Mr. Blaisdell:

SUBJECT: REGULATORY STAFF POSITIONS

Regarding Black & Veatch topical report BVTR-1-0, "Quality Assurance Program Description," we have reviewed your July 2, 1979 response to our questions of April 30, 1979. We have enclosed our positions on items where there is not complete agreement or where clarification is required.

Within 45 days from receipt of this letter, please respond to the enclosed "Regulatory Staff Positions." Also incorporate the Black & Veatch response to questions 10, 12, 13, 14, 16, 17, 24, 27, 29, and 32 into the topical report. We again require 4 copies of your response.

If you have any questions, please call Jack Spraul of my staff on (301) 492-7741.

Sincerely,

Original signed by  
Walter P. Haass

Walter P. Haass, Chief  
Quality Assurance Branch  
Division of Project Management

Enclosure:  
Regulatory Staff Positions

756 187

OFFICE →	DPM:QAB	DPM:QAB	DPM:QAB	DPM:QAB		
SURNAME →	JSpraul:gt	FLiederbach	JGilray	WHaass		
DATE →	7/26/79	8/1/79	8/1/79	8/1/79		

REGULATORY STAFF POSITIONS

BLACK & VEATCH CONSULTING ENGINEERS

- 3A. Items d through h of item 3 have not been responded to. Please respond to these items.
- In Table 2-1, your position 2 to Reg. Guide 1.38 limits the net weight up to 1000 lbs. and then allows qualification tests when loads exceed 1000 lbs. If you intend to exceed the 1000 lb. limit, then specify the maximum you expect and describe the extent of your qualification program.
- 4A. The response to item 4 is acceptable, but the information in the last paragraph of the response should be incorporated into the topical report. Please revise the bottom of page 1-9 from "reviews quality assurance manuals" to words to the effect that the QA Group "reviews vendors and contractors' quality assurance programs and manuals when Black & Veatch is contractually responsible for this activity."
- 11A. The response to item 11 is not responsive. Please respond to item 11 in the topical report; i.e., without reference to procedures, briefly describing the activities associated with the preparation and review of design documents mentioned in part 3.1 of the topical report and indicate the organizational responsibilities for preparing, reviewing, approving, and verifying design documents such as system descriptions, design input and criteria, design drawings, design analyses, computer programs, specifications, and procedures.
- 15A. Table 2-3, as revised, does not respond to item 15. Please respond to item 15 in the topical report. We suggest the response be in section 3 of the topical report, but this is not a requirement.
- 18A. Please include in the topical report those QA program controls that must be incorporated in procurement documents. Be sure that the commitments include applicable inspection and test requirements as well as special process instructions.
- 19A. Item 19 has not been adequately responded to. Specifically address the expansion of the list on page 6.2 in accordance with item 19.
- 20A. Provide a statement in the topical report that procurement documents prepared by Black & Veatch require the supplier to furnish the following records to the purchaser:

- a. Documentation that identifies the purchased item and the specific procurement requirements (e.g., codes, standards, and specifications) met by the item.
- b. Documentation identifying any procurement requirements that have not been met.
- c. A description of those nonconformances from the procurement requirements dispositioned "accept as is" or "repair."

Or provide an alternative for our evaluation.

- 21A. Please expand the response to item 21 to include the processing of contractor information and incorporate the entire response into the topical report.
- 23A. Your response to item 23 is not complete. Please include in your response that suppliers' special processes procedures will be reviewed by Black & Veatch to assure that the controls identified in item 23 are properly addressed.
- 25A. The last sentence in section 15 of the topical report implies that nonconformances "which do not affect original design" are treated differently than nonconformances which do, and item 25 resulted. Please incorporate the response to item 25 into section 15 of the topical, thus clarifying that there is no difference.
- 26A. While we agree that the Black & Veatch involvement in construction activities may vary from project to project, our concern that resulted in item 26 is how Black & Veatch assures that problems arising in the design of one project are eliminated and not carried into subsequent projects. We are concerned with how Black & Veatch keeps informed of such problems and the action it takes to prevent recurrence. Please revise the response to item 26 to be responsive to NRC concerns and incorporate it into the topical report.
- 28A. The response to item 28a refers to standard procedures. Please respond to item 28a without reference to the procedure; i.e., identify organizational elements responsible for identifying, indexing, and storing quality assurance records. Incorporate this response and the response to 28b into the topical report.
- 31A. The last sentence in the response to item 31 refers to a standard procedure. Please substitute a commitment - that auditors are trained - for the last sentence and incorporate the entire response into the topical report.

756 189