

Bechtel Power Corporation

Engineers—Constructors

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July 11, 1979

United States Nuclear Regulatory Commission
Office of Inspection & Enforcement
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

Docket No. 99900522/79-03
Program No. 51200

Attention: Mr. Ullis Potapovs, Chief
Vendor Inspection Branch

Gentlemen:

This letter is in response to your letter dated June 22, 1979 transmitting the report of your QA Program inspection conducted at the Ann Arbor Office on May 22-25, 1979.

The attached response provides a written statement containing a description of the steps that have been or will be taken to correct the two deviations; a description of the steps that have been or will be taken to prevent recurrence; and the dates that corrective actions and preventive measures were or will be completed.

Very truly yours,

A handwritten signature in dark ink, appearing to read "R. D. Allen".

R. D. Allen
Vice President

RDA:fa

Attachment

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Bechtel Power Corporation Response to
Deviations Described in NRC Inspection
Report No. 99900522/79-03

Deviation A

Section 3(17.1.3) (Design Control) of Bechtel Topical Report BQ-TOP-1, Revision 1A states in part, "Engineering department policies, standards, design guides, procedures, and instructions are employed for control of engineering design work to meet technical and regulatory requirements. . ."

Paragraph 4.0 (Checking) of Engineering Department Procedure (EDP) - 4.37 (Design Calculations) states in part, "Engineering design calculations shall be checked by an engineer. . . ."

Contrary to the above, engineering design calculation No. F-M-3720-33 (Reactor Building Sprayed vs Unsprayed Volume/Area) dated April 1, 1977, used as input to other safety related engineering design calculations, had not been checked by an engineer.

Response

1. Remedial Action:

Calculation F-M-3720-33 is in the process of being checked and approved. If original results are not acceptable, the impact on subsequent design documents in which this calculation was referenced will be reviewed and appropriate action taken.

Bechtel has initiated a complete survey of final, committed preliminary, and preliminary calculation binders for further unchecked calculations. Any calculations found to be unchecked will be checked, and impact reviews will be made, as stated above, should the checking reveal unacceptable results.

2. Steps Taken to Prevent Recurrence:

Engineering Department Procedure (EDP) 4.37, Design Calculations, will be revised to clarify that calculations are to be checked and approved prior to the use of their results in finalizing a design basis.

Proper checking and approval of calculations will continue to be emphasized during project meetings and in surveys performed under the responsibility of the Project Quality Engineer. We will stress that the user of any calculation must assure, prior to finalizing a design basis, that the calculations has been checked and approved, that it is the latest revision, and that it is pertinent to the use for which it is intended.

3. Dates of Corrective and Preventive Measures:

Engineering Department Procedure (EDP) 4.37, Design Calculations, will be revised, by MED, by August 15, 1979.

Engineering calculation No. F-M-3720-33 (Reactor Building Sprayed vs. Unsprayed Volume/Area) will be checked and approved, and the survey to determine any other unchecked calculation will be completed on or about August 15, 1979.

Priorities will be established for the checking of any calculations found unchecked and a schedule for completion of the checking and impact review will be documented and monitored until completion.

Deviation B

Bechtel Topical Report BQ-TOP-1, Revision 1A (applicable to Project 7220), Section 5 (17.1.5), states in part:

"Bechtel procurement documents require suppliers and subcontractors to submit specified procedures to Bechtel for approval prior to start of fabrication or construction. Bechtel reviews of these documents are performed to determine . . . that procedures are acceptable."

P. O. 7220-M-333(Q) for safety-related pressure relief valves (Class I) requires in Section 4.2.1 and 4.2.2 of the specification and on form G-321-D (Engineering and Quality Verification Document Requirements) that the vendor perform solution anneal heat treatment on all austenitic stainless steel materials per Regulatory Guide 1.44 and "submit heat treatment procedures to be used for this work for Buyer's (i.e. Bechtel's) approval prior to the start of work."

Contrary to the above, vendor has not submitted and Bechtel has not reviewed or approved any heat treatment (solution annealing) procedures, although certain stainless valve bodies associated with P. O. 7220-M-333(Q) have been fabricated and processed past the stage at which solution-anneal heat treatment was performed, as indicated by Bechtel Supplier Quality Representative reports.

Response

1. Remedial Action:

A Specification Change Notice (SCN) was issued May 25, 1979 to clarify that procedures for heat-treatment of austenitic stainless steel need not be submitted for the Buyer's approval when the material specification requires that the material be provided in the solution-annealed heat treatment condition and quenched in water from 1900^oF or is capable of meeting the test for resistance to intergranular corrosion.

2. Steps Taken to Prevent Recurrence:

A Supplier Quality Department Project Memorandum will be issued to reemphasize that SQR's are to ascertain that all procedures requiring Project Engineering review have acceptable review status prior to witnessing a procedure in process. The verification activity will be addressed in the quality surveillance report.

3. Date of Corrective and Preventive Measures:

Specification Change Notice No. 1 of 7220-M-333(Q) was issued May 25, 1979.

Supplier Quality Department Project Memorandum for the Midland Project will be issued on or about July 16, 1979.