



550 Kinderkamack Road ■ Oradell, New Jersey 07649 ■ Tel. N. J. (201) 265-2000 - N. Y. (212) 563-7700
TWX 710-990-4959 ■ Cable BURNS ROE ORA

June 5, 1980

SUBJECT: USNRC Inspection
Docket No. 99900503/80-01
Notice of Deviation

U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76012

Attention: Uldis Potapous, Chief
Vendor Inspection Branch

Dear Mr. Potapous:

Attached are the Burns and Roe, Inc. responses to the subject notice of deviation transmitted by your letter of May 7, 1980.

Each response contains a description of the steps that have been or will be taken to correct these items, a description of the actions taken to prevent recurrence and the dates in which those preventive and corrective actions were or will be taken.

Should you have any questions regarding the subject responses, please feel free to contact Mr. W. P. Rausch at 265-2000, Ex. 844.

Sincerely,

Tom A. Hendrickson
Vice President

TAH/ep
Attachment

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NOTICE OF DEVIATION

A.1 Sections D.2.8.3 and D.3.4.3.2 of the PSAR respectively state in part that, "The design contractors including Burns and Roe are responsible for verifying the adequacy of the design...Design control measures will be applied to verify or check the adequacy of the design..."

Contrary to the above, design control measures are not being applied to verify or check the adequacy of all design drawings and specifications generated by Burns and Roe.

Company's Response

The deviation is acknowledged.

Corrective Action

The intent of the Burns and Roe calculation, drawing and specification procedures are to require a verification of design adequacy through design reviews. The calculation procedure specifically states that the design check is to be performed by a checker of adequate qualifications assigned by the Group Supervisor/Designee. The drawing and specification procedures also imply that the Group Supervisors determine the cognizant engineers to review drawings and specifications. However, these procedures do not state that the engineers performing the design review or check cannot be the engineer who prepared the document.

For clarification of the design review or check process used by Burns and Roe, the procedures for drawing and specification review and approval will be modified. The revision will clearly state that the preparer of a drawing or specification and their revisions may not perform the required design review or check.

The procedure revisions will be issued by June 30, 1980.

Preventive Action

The revised project procedures (drawings and specifications) will be transmitted to the Corporate Project Procedures Subcommittee. The Corporate Project Procedures Subcommittee is responsible for updating and correcting the generic Burns and Roe corporate project procedures. This action will be completed by August 30, 1980.

NOTICE OF DEVIATION

A.2 Section D.2.8.17 of the PSAR states in part that, "Burns and Roe has been given the responsibility to receive, store and maintain the quality assurance records of WPPSS..."

Contrary to the above, Burns and Roe is not receiving, storing and maintaining the quality assurance records for WPPSS.

Company's Response

The deviation is acknowledged.

Corrective Action

In February 1978, WPPSS assumed all responsibilities for Site Quality Assurance activities which included the Quality Assurance Records. Burns and Roe now assists WPPSS in performing the Site Quality Assurance activities, but has retained Engineering and Design and partial prepurchased contract responsibilities.

Draft revisions of the WPPSS and B&R Quality Assurance Sections contained in the PSAR have been prepared by Burns and Roe. These revisions reflect the current B&R and WPPSS responsibilities as well as organization changes. Revisions to the WPPSS Sections were made to show proper interface. The draft revisions are currently under review and will be transmitted to WPPSS by June 30, 1980.

Preventive Action

In the future, whenever the B&R scope of services are changed, the revised PSAR Quality Assurance Programs prepared by B&R will be appropriately updated and transmitted to WPPSS, the Licensee. Region IV of the NRC will be notified of the B&R scope of service change by copy of the letter to WPPSS.

NOTICE OF DEVIATION

- B. The NRC Letter of Acceptance of the Burns and Roe Topical Report No. B&Roe-COM4-1-NP-1A states in part that, "Organizational changes which do not affect the program are to be submitted no later than 30 days after announcement..."

Contrary to the above, organizational changes in the Quality Assurance and Project Organizations made in October 1979, November 1979 and March 1980 were not submitted to the NRC within 30 days after announcement.

Company's Response

The deviation is acknowledged.

Corrective Action

A review of Chapter I, Organization of the Burns and Roe Topical Report was conducted to assure that all organizational changes would be addressed. Organizational revisions which affected the Topical Report were submitted to Mr. C. J. Heltmes, Jr. on 5/16/80 by the Director of Project Support and Quality Assurance Divisions. Burns and Roe is currently reviewing and updating the entire Topical Report, at which time revisions to the organization will be formally incorporated. Submittal of the revised Topical Report is scheduled for July 15, 1980.

Preventive Action

Programmatic changes to the Topical Report will be submitted to the NRC prior to implementation and any organizational changes which do not affect the program shall be submitted to the NRC by the Director of Project Support and Quality Assurance Divisions within the thirty day requirement. The Director is made aware of all organization revisions via the Burns and Roe corporate announcement system. The establishment of preventive measures is complete.

NOTICE OF DEVIATION

- C. Paragraphs B.12.a and B.12.b of Burns and Roe project procedure WNP-2-ED-010 (Calculations) state in part that, "Assigned Checker...writes on the lead sheet...results are satisfactory...to certify that the check has been completed..."

Contrary to the above, two (2) of eighteen (18) checked design calculations examined by the inspector that had been completed did not exhibit the required statement "results are satisfactory".

Company's Response

The deviation is acknowledged.

Corrective Action

The statement required by the calculation procedure was immediately added to the two deficient calculations.

Preventive Action

The eighteen calculations reviewed during the audit were prepared, checked and approved in accordance with the calculation procedure. The requirement for the Checker's statement became effective July 1, 1977 and was intended to be a more visible means to show the calculation was satisfactory. However, as the procedure indicates, the checker cannot sign the lead sheet or initial all other sheets until the check is completed and all comments have been incorporated or resolved. So, the added statement does not add any assurance of quality but creates an unnecessary step in the procedure. Therefore, the procedure will be revised to indicate that the signature of the checker on the lead sheet and his initials on the remaining calculation sheets will signify that the calculation is satisfactory. The procedure revision will also indicate that the deletion of the currently required statement will be retroactive to July 1, 1977 and if any calculation was prepared after July 1, 1977 and does not contain the statement, the checker's required signature and initials on the calculation will indicate that it is satisfactory.

The procedure will be revised by June 30, 1980.

NOTICE OF DEVIATION

- D. Paragraphs 16 and 21 of Burns and Roe Project Procedure WNP-2-QA-001 states in part that, "Audit team members ...complete the Recommendation Block of the Audit Finding Report(s) for their findings...(and the) Assistant to the Director of QA...forwards the (audit report and) checklist and other data to QA Division audit file..."

Contrary to the above, the Recommendation Block was not completed in four (4) of thirteen (13) Audit Finding Report forms and checklists were not forwarded nor filed for three (3) of seven (7) audit files that were examined by the inspector.

Company's Response

The deviation is acknowledged.

Corrective Action

The three audit files which had missing checklists were corrected on 5/16/80 when the checklists were placed in the file. The deficiency, for the four Audit Finding Report forms in which the recommendation block was not completed, has been documented in each of the affected audit file folders. This documentation includes a statement that the recommendation block will not be completed for these forms since the corrective action has already been accepted pending verification and that it would be inappropriate to make a recommendation at this time. This action was completed on May 16, 1980 also.

As a result of the deviation, an audit of the QA audit files was conducted to assure procedural compliance. This audit was completed on 5/7/80. Deficiencies which have been noted are being corrected or the folders are being annotated to explain the deficiency and why it is being accepted on a case-by-case basis. Correction of the folders will be accomplished by June 2, 1980.

Preventive Action

All auditors have been instructed by formal memorandum to assure that each of the procedural requirements are accomplished. Preventive corrective action was completed on May 20, 1980.

NOTICE OF DEVIATION

- E. Paragraph 5.2.2 of Burns and Roe Quality Assurance Instruction 07-102 states in part that, "Approved (Source Verifications) plans are included in the Vendor Surveillance Project Plan as Section V..."

Contrary to the above, an approved Source Verification Plan was not included in one of two (2) Vendor Surveillance Project Plans examined by the inspector.

Company's Response

The deviation is acknowledged.

Corrective Action

Page 2 of the cited Source Verification Plan was apparently misplaced when it was removed from the Vendor Surveillance Project Plan folder for copying purposes. The missing page has been reconstructed, using information which is included in the vendor notification point schedule maintained by the B&R Resident Inspector, and has been inserted in the Vendor Surveillance Project Plan. A copy of the reconstructed page has been transmitted to the B&R Resident Inspector. This action was completed May 28, 1980.

Because the missing information was available to the B&R Resident at the Vendor's plant, the deficiency did not affect the surveillance program. All other Source Verification Plans have been reviewed by the Manager of Vendor Surveillance and NDE to assure the plans are complete. No other deficiencies were identified.

Preventive Action

To preclude recurrence, B&R Quality Assurance Instruction 07-102 will be revised to indicate that a copy of the Source Verification Plan will be maintained in the Vendor contract file in addition to the original maintained in the Vendor Surveillance Project Plan. This will be accomplished before June 30, 1980.