

Bechtel Power Corporation

Engineers—Constructors

15740 Shady Grove Road
Gaithersburg, Maryland 20760
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April 7, 1980

Docket No. 99900519/79-03

Mr. Uldis Potapovs
Vendor Inspection Branch
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

Reference: a) Letter, U. Potapovs, USNRC, to J. M. Komes,
Bechtel Power Corporation; September 24, 1979,
Inspection Docket No. 99900519/79-03

b) Letter, J. M. Komes, Bechtel Power Corporation,
to U. Potapovs, USNRC; March 5, 1980

Dear Mr. Potapovs:

This responds to Deviation C of the Notice of Deviation in your September 24, 1979, letter, reference a. The Deviation is the result of an August 20-24, 1979, Quality Assurance Inspection of our SNUPPS Project. It deals with a requirement for evidence that required interdisciplinary design coordination has actually occurred. Because of its impact on projects other than SNUPPS and ensuing discussions of this issue with our other Divisions, we confirmed a previous request for an additional ninety (90) days to respond in my March 5, 1980, letter, reference b.

We understand that more explicit direction, regarding requirements for evidence of interdisciplinary coordination, will be issued officially by the Nuclear Regulatory Commission. We will prepare and submit a corporate response based on that direction. Therefore, our response below covers the SNUPPS Project only and is invoked on a non-retroactive basis, effective May 1, 1980.

Our response is based on the understanding that your draft QAB Interpretation Statement 12 is concerned primarily with establishing that required interdisciplinary coordination has actually occurred, and that coordination initials, retained as evidence of this process, are not considered acknowledgment of responsibility for the contents of the design documents. This responsibility is retained by the preparing discipline.

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Mr. Uldis Potapovs

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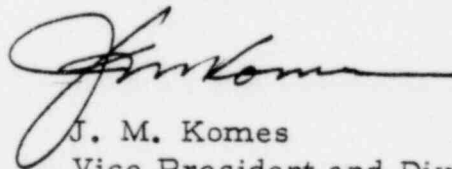
April 7, 1980

Response to Deviation C in Reference a

Initials of the Group Supervisor/Group Leader of interfacing disciplines, or of an assigned subordinate, will be placed directly on those design documents for which interdisciplinary design review is required. Affected procedures in the SNUPPS Project Engineering Procedures Manual will be revised to include the following statement:

"The cognizant Discipline Group Supervisor shall determine the need for coordinating Bechtel design documents with other disciplines of the Project Engineering Team. This will differ depending on the nature of the document and of the revision. A coordination signature block shall be provided for each Bechtel design document (Editorial Note: use document title(s) appropriate to EDPI) for required discipline Group Supervisor/Group Leader or an assigned subordinate's initials. The letters N. R. (Not Required) will be placed in the appropriate discipline boxes for each revision to be issued. The Project Engineer shall review the coordination signature box to ensure that the revision has been properly coordinated. His signature in the approval box attests to this fact."

Very truly yours,



J. M. Komes
Vice President and Division Manager

JMK:mr