

Babcock & Wilcox

Power Generation Group

P.O. Box 1260, Lynchburg, Va. 24505

Telephone: (804) 384-5111

May 19, 1980

Mr. Uldis Potapovs, Chief
Vendor Inspection Branch
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

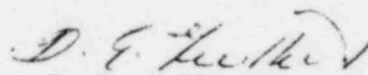
Dear Mr. Potapovs:

The attached report summarizes Babcock & Wilcox responses to the Notice of Deviations identified in the NRC Inspection Report 99900400/80-01 dated April 16, 1980.

We have reviewed both the NRC Inspection Report, and our responses, and find that neither includes information that is considered proprietary.

Should you have any questions concerning our reply, we will be pleased to discuss them with you.

Sincerely,



D. E. Guilbert
Vice President
Nuclear Power Generation Division

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B&W-NPGD (LYNCHBURG)
RESPONSE TO NRC INSPECTION REPORT NUMBER 99900400/80-01

Response to Notice of Deviation - A

The B&W Topical Report (BAW-10096A), the B&W Policy on Records Retention (NPG-1311-08G) and the B&W Records Management Manuals (1E and 1E1) commit to implementing ANSI N45.2.9-1974 (Collection, Storage and Maintenance of Nuclear Power Plant Quality Assurance Records). Section 3.2.1 of the reference ANSI document states in part that " . . . All such quality assurance records shall be legible, completely filled out, and adequately identifiable to the item involved. . . "

Contrary to the above, approximately fifteen (15) percent of the sample of microfilmed QA records retained by the NPGD Records Center that were examined by the inspector were either not legible, not completely filled out, or not adequately identifiable to the item involved.

NPGD Response

The following actions will be taken to resolve the problem identified in Deviation A:

- A. Determine the number of deficient QA records. (Action scheduled for completion by May 30, 1980).

A listing of all documents contained in the Historical Documents List (HDL) is being generated by Management Information Systems (MIS). This list will be identified as "List A". The Computer Services Section will utilize a random number generation technique to select a sample from List "A". The sample selected will be identified as "List B". List B shall consist of six groups of sixty (60) documents each. This initial sample (List "B") will be utilized by Computer Services to determine the size of the final statistical sample.

Forms have been developed to gather statistical data necessary for evaluation of the scope of the illegible records problem.

- B. Develop plan to correct deficient records (scheduled for completion by June 6, 1980).

Data Management, Computer Services, and Engineering will evaluate the statistical data developed in "A" above and utilize the results to develop a plan for correcting existing records. This plan, with appropriate target dates for its accomplishment, will be available for your review during the next scheduled inspection.

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C. Action taken to preclude recurrence of the deficiency

Comparative standards of legibility have been devised and have been placed at various locations throughout the NPGD facility. All personnel will be able to determine acceptable legibility by comparing their documents against the displayed standards.

Documents being entered into the Records Management System are being checked by Data Management to assure that they are complete and identified to the applicable item or activity.

The calculation procedure (NPG-0402-01) has been revised to add more specific instructions for filling in all blanks on the calculation forms.

Notice of Deviation - B

Section VI.A.2 of B&W Operating Instruction OI-1037 (QA Audit Record System) states in part that "After close out of an audit report, a permanent audit report file will be prepared. . . and will include. . . f.checklist used in the audit concerned. . ."

Contrary to the above, the checklists used during the execution of fifteen internal audits were not included in the permanent audit report files of audits that had been closed.

NPGD Response

For Internal Audits through #68, checklists used were incorporated into the text of the audit reports. The audit reports are on file in the NPGD Records Center.

For Internal Audits #69 through #78, only Internal Audits #71, #72, and #74 are closed. Because of its single pointed purpose (i.e. impact of CPCO Field Changes on Spare Part listings and Instruction Manuals), a checklist was not used for Internal Audit #72. Checklists for Internal Audits #71 and #74 have been sent to the NPGD Record Center.

This deviation occurred because of conflicts between OI-1037, "QA Audit Record System" and OI-1041, "NPGD Internal Audits". These OI's will be revised to eliminate conflicting requirements for record retention by June 15, 1980. In the interim period, record retention requirements of OI-1037 will be followed as Internal Audits are closed.

Notice of Deviation - C

Appendix A of the B&W Topical Report (BAW-10096A) commits to implementing the requirements of ANSI-N45.2.12, Draft 3, Revision 4 dated February 22, 1974 (Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants). Paragraphs 2.3 and 5.3, 4.3.3, and 4.4 of the referenced ANSI document respectively require that:

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1. "Auditing personnel, including technical specialists, shall have, or be given, appropriate training. . .Records shall include the qualifications and training of auditors and shall be retained for the same period of time as required for the audit report with which the auditors are associated."
2. "At the conclusion of the audit, a post-audit conference shall be held with management of the audited organizations to present audit findings and clarify misunderstandings. The detailed observations of the auditors should be reviewed and an understanding should be recorded and signed by both parties."
3. "An audit report shall be written and signed by the audit team leader which provides. . . 1.a description of the audit scope. . ."

Contrary to the above, the applicable implementing B&W procedures for qualifying auditors and for executing and reporting internal and vendor audits do not contain these requirements for records or actions.

NPGD Response

Deviation C

The applicable OI's will be revised by June 15, 1980 to incorporate the requirements cited in this deviation. Review of past audit reports and auditor qualifications, indicates that the intent of these requirements have been met. The QA Auditors have been instructed to comply with these requirements.

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UNRESOLVED ITEM:

"It could not be determined that CVAR's receive the equivalent review and approval as the original PO technical requirements documents".

NPGD Response:

The two CVAR's cited in the audit report were processed as Category 2 CVAR's and as such did not receive a review by the Integrator. The variation was a departure from the equipment specification requirements and as such should have been processed as a Category 1 CVAR and subjected to the same reviews as the technical requirements document from which it deviated.

The cited CVAR's have been reviewed by the cognizant Hardware Engineer (See note) who has verified that the decision made by the Task Engineer to accept the WKM Valve without backseating did not compromise the system requirements and is acceptable for the operating temperatures and pressures. This review is documented and on file with the CVAR's.

A random spotcheck was made of 18 CVAR's issued during the time period 1978 to 1980 to determine if similar CVAR's existed. All CVAR's reviewed were found to be in compliance with the procedure requirements. The CVAR's cited in the audit apparently are "isolated" errors (both CVAR's were processed within the same time period by the same personnel). This review concluded that there is no apparent breakdown in the QA Program and no further action is deemed necessary at this time.

NOTE: The Hardware Engineer has been assigned the responsibilities formerly performed by the Integrator. The recent re-organization of the Engineering Department resulted in the dissolution of the Integration Section. The duties and responsibilities of the Integrators have been assigned to various sections within the Engineering Department. This organization change was discussed with the NRC Quality Assurance Branch, Division of Project Management on April 14, 1980. Acceptance of the changes were received from Mr. W. P. Haass, Chief QA Branch, via letter of April 28, 1980.

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