

Gibbs & Hill, Inc.

ENGINEERS DESIGNERS CONSTRUCTORS

DIRECT DIAL EXTENSION

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June 23, 1980

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

Subject: Docket No. 99900524/80-01

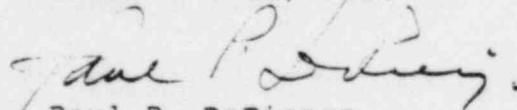
Dear Mr. Potapovs:

Attached is the additional information requested in your letter dated June 5, 1980 pursuant to the inspection of our QA Program, conducted by Mr. D. F. Fox of your office, on February 25-29, 1980.

Please be assured of our continued conviction to implement our Quality Assurance Program in accordance with NRC requirements.

Very truly yours,

GIBBS & HILL, INC.



Paul P. DeRienzo
Vice President
Quality Assurance

PPD:rc
Enclosure

QAI-1 is being revised concurrently with QA-7, "Issuance, Modification and Control of Project Procedures," and will be revised by June 30, 1980.

Additional Information Requestd by NRC

With respect to corrective actions concerning deviation C, please describe the cause contributing to this deviation, if the deviation relative to Spec. No. MS-43A was an isolated case (and your bases), and how you have assurance that other specifications do not have similar deviations.

Gibbs & Hill Action

The cause contributing to this deviation was misinterpretation of the G&H specification by ITT Grinnell. This misinterpretation was translated into a procedure which did not meet the specification requirements. The procedure was, however, approved by Gibbs & Hill.

The deviation relative to Spec. No. MS-43A is an isolated case. Only one other vendor, Southwest Fabricating and Welding, is using this specification but does not produce bends in stainless steel pipe. Therefore, the annealing requirements do not apply to Southwest's piping.

Two other specifications of like nature were reviewed by NRC for generic aspects: Spec. 2323-43B and Spec. 2323-43A.1. The NRC concluded that the Specifications and the related vendor procedures were in order. Other piping specs. reviewed were non-nuclear related.

As a means of strengthening the systems for internal review of vendor procedures, Project Lead Discipline Engineers have been instructed by memo from the PQAS (issued 4/25/80) to utilize the review services of the project metallurgical engineer. This review is being performed for procedures involving metallurgical processes, and is in addition to the established engineering review.

NRC Docket No. 99900524/80-01
NRC Letter dated June 5, 1980

Additional Information Requested by NRC:

With respect to deviation A, please identify the method(s) and date(s) by which Gibbs and Hill will determine that all of the requirements of ANSI N 45.2.12 are included in procedures QA-2, QA-4, and QAI-7 as appropriate.

Gibbs & Hill Action:

Gibbs & Hill, Inc. is committed to revise the above procedures so that requirements of ANSI N 45.2.12 are included.

The requirements of G&H revised procedures have been compared with those of ANSI N 45.2.12, Draft 3, Rev. 0, to assure compliance with those standards. A matrix has been prepared cross-referencing the ANSI Standard with the equivalent requirement of the G&H procedures.

The matrix format is as follows:

<u>Requirement</u>	<u>ANSI 45.2.12 Paragraph No.</u>	<u>G&H Procedure Paragraph No.</u>	
		<u>QA-4</u>	<u>QAI-7</u>

The matrix was completed June 20, 1980 prior to the release of the revised QA procedures.

Additional Information Requested by NRC:

With respect to deviation B, please indicate whether procedure QAI-1 will require revision to reflect the new system for control of manuals and if so describe the nature of the revision and the date it will be accomplished.

Gibbs & Hill Action:

QAI-1 is being revised to incorporate the follow-up system used for control of Project Procedure Manuals. A copy of the acknowledgement memo is being added to the QAI. In addition, the QAI Manual Holders List is being modified to provide space for follow-up control relative to the receipt of acknowledgement forms.

Distribution of the QAI manuals is restricted to QA Department personnel plus one copy to the Site QA Engineer. Therefore, timely return of the acknowledgement receipts is to be implemented through personal contact by the Project Quality Administrative Assistant with the manual recipient, under the guidance of the Project QA Supervisor.