

June 23, 1980

Mr. Uldis Potapovs, Chief
Vendor Inspection Branch
United States Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 36012

Re: NRC Letter from U. Potapovs, Docket No. 99900505
Inspection Report No. 80-01 dated June 3, 1980

Dear Mr. Potapovs:

In response to your letter to Mr. B. E. Tenzer dated June 3, 1980, the following information is hereby submitted. Our responses are identified in accordance with the paragraph numbers used in the attachment to your letter, "Notice of Deviaition."

DEVIATION A

Inspection and Test Plan from Manufacturer

Ebasco Engineering requires the submission of an Inspection and Test Plan from a manufacturer whenever the criticality or the complexity of the equipment indicates a multi-staged fabrication and assembly sequence. Where manufacture is essentially simple and straightforward or when testing could be primarily used to establish the acceptability of a product, the submittal of the fabrication sequence is waived. However, Ebasco Services concurs that the phrasing in Section QA-II-5 of its Topical Report ETR-1001 is explicit in stating that a supplier shall be required to submit a fabrication sequence and permits no options. Therefore, a revision to the Topical Report will be prepared to modify paragraph 4.1.1 of Section QA-II-5 to provide the Quality Assurance Engineer flexibility in applying this requirement on all suppliers. The revised Section QA-II-5 will be submitted to the Nuclear Regulatory Commission for approval by September 1980. However, in connection with the contracts referenced in the report, the purchase orders were issued with Ebasco Specification 860-W "Contractor Quality Assurance Requirements" attached. Ebasco Specification 860-W states in paragraph 5.10 "Contractors shall prepare Inspection and Test Plans which defines overall Inspection and Test Requirements, criteria for acceptance and data to be recorded and shall submit this together with its fabrication sequence to Engineer so that points may be pre-established for examination or witnessing by Engineer." Therefore, we consider that the existing ETR-1001 Section QA-II-5 paragraph 4.1 for submittal of a detailed fabrication sequence showing required tests and inspections was fulfilled in the four contracts referenced.

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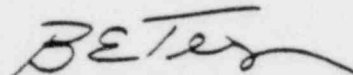
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DEVIATION B

Review of Engineering Procedures

The WPPS Project related Topical Report ETR-1001 was modified in the WPPS Manual of Procedures, Volume 2, Section QA-II-8 to assign the Ebasco Lead Discipline Engineer the responsibility for the coordination of all review functions associated with Supplier special process procedures. However, no equivalent modification was made to Section QA-II-5 and this inadvertently created the contradiction noted in your finding. In order to make the WPPS Project related Topical Report ETR-1001 consistent, Ebasco will modify Volume 2 to include a reference to Section QA-II-5 which will then state "The Ebasco Lead Discipline Engineer shall be responsible for the coordination of all review functions associated with supplier special process procedures." This change will be completed by September 1980.

Very truly yours,



B E Tenzer, Director
Materials Engineering & Quality
Assurance

RFW/mb

cc: B R Mazo