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May 30, 1980

Mr. U. Potapovs, Chief
Licensee Contractor, Vendor
Inspection Branch
United States Nuclear Regulatory
Commission, Region IV
Office Of Inspection and Enforcement
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

Reference: Docket 99900401/80-01
Letter from U. Potapovs to
M. R. Etheridge, received
May 5, 1980

Dear Mr. Potapovs:

C-E Power Systems Group's response to the referenced report is as follows:

DEVIATION I-A

Of the nine (9) audit reports issued in 1979, three (3) were not issued within thirty (30) days as required. Specifically Audit Report Nos. QAS-79-004, QAS-79-002S and QAS-79-006.

RESPONSE

The internal audits cited were published during 1979.

All 1980 internal audits have been reviewed and they were published within the thirty (30) days following the post audit conferences. The Manager of GQS has issued a directive to the Compliance Supervisor stating the procedure must be adhered to. The directive requires the Compliance Supervisor to advise the Manager of GQS of the completion date for all internal audits and to establish a target date of twenty (20) days for publishing of the report. If the target date of twenty (20) days after the post audit conference is exceeded, the Manager of GQS or the Director of GQA shall be notified.

This constitutes the corrective and preventative action relative to this deviation.

8007140-037

DEVIATION I-B

Certain quality related activities performed by Project Management Organization are not documented through written operating procedures; specifically, these activities, required by CE Topical, Section 17.15, are to determine acceptability of recommended resolution of FARs (Field Action Requests documenting site identified non-conformances) and to indicate whether the nonconformance affects quality.

RESPONSE

The intent of C-E's Quality Program is to ensure that Project Managers are not required, and indeed are prevented from making final quality or safety related decisions since such actions are precluded by regulations which prohibit those responsible for schedules and budgets to make such determinations. Any approvals by CE Project Managers are administrative. C-E believed this intent was made clear in the C-E Power Systems Quality Assurance of Design Procedures Manual which states in QADP 5.7 on Page 5.7-4 Paragraph 5.7.5.1, "The cognizant engineer shall stamp the FAR as a Quality Record if the FAR is applicable to a safety related component of system." Thus the cognizant engineer is making the determination as to whether the nonconformance affects safety. The necessary clarifications regarding administrative approvals of Project Managers and the cognizant engineer's responsibility for determining safety implications will be made in QADP 5.7 by October 1, 1980. Likewise, QADP 6.3 will be revised by October 1, 1980 to clarify that the cognizant engineer checks the appropriate box to indicate whether the condition described on a DCR is a Reportable Deficiency and that the Project Manager informs the licensee. Editorial changes to clarify C-E's intention that quality related decisions not be made by Project Management will be made in the C-E Quality Assurance Program when it becomes necessary to submit a revision.

This constitutes the corrective and preventative action relative to this deviation.

DEVIATION I-C

The responsibility for assuring that personnel performing activities affecting quality are suitably trained has not been met by Project Management Organization in that there are not records or procedural requirements to provide training in activities affecting quality such as generation, processing, approval, tracking and closure of FARs (Field Action Requests) and determination of whether safety is affected by FARs and DCRs (Deviation of Contract Requirements).

RESPONSE

Since Project Management Organization does not perform activities directly affecting quality, no formal training program is required. When the commitments for clarification of procedures in I-B above are completed, no further changes will be required.

This constitutes the corrective and preventative action relative to this deviation.

DEVIATION II

The review of the current revisions of all Reactor Auxiliary Components group specifications falling within the scope of the QADM was not completed until April 8, 1980. This review was to be completed by December 3, 1979.

RESPONSE

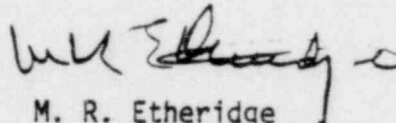
This incident will be discussed at the next Mechanical Design staff meeting with all department managers to emphasize the requirement that QA corrective action must be completed within the time frame specified. This discussion will be documented. The specific incident will be discussed with the supervisor of the Reactor Auxiliary Components group to assure it will not be repeated. This discussion will be documented by memo from the Manager Fuel Engineering to the Supervisor Reactor Auxiliary Components. This action will be completed by June 16, 1980.

This constitutes the corrective and preventative action relative to this deviation.

If you have any questions relative to this response, please contact me.

Very truly yours,

COMBUSTION ENGINEERING, INC.



M. R. Etheridge
Vice President
Power Systems Group

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