

July 2, 1980

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

Dear Mr. Potapovs:

Docket No. 9900510/80-01

This letter acknowledges receipt of your Inspection Report dated June 4, 1980 describing the Quality Assurance Program inspection conducted by Mr. D.G. Anderson at United Engineers & Constructors Inc. in Philadelphia on May 5-9, 1980.

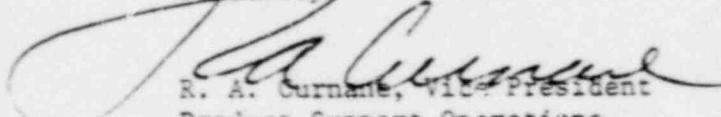
Your inspection revealed five(5) deviations from certain NRC requirements. Since UE&C provided the corrective action on three(3) of these deviations, namely A, B and C, before the end of the inspection, we are now providing the preventative actions to be or that have been taken and the completion schedule.

Both the corrective and preventative actions were provided for Deviation D.1 before the end of the inspection, so no further written response was required by your report. The remaining Deviations, D.2 and E. required the corrective and preventative actions, which we are now providing to you.

We have enclosed for your information and review, a summary of this action along with the schedule of implementation and completion.

Please note also that there is an inaccurate statement in your report, Section I, paragraph C.3.a on page 6. The sentence "UE&C then conducted an internal audit of the WPPSS Specification list and determined that an additional twenty-four(24) specifications contained incorrect ARS" should actually state that one(1) specification, 9779-101, was found with an incorrect ARS specified for 24 individual pieces of equipment.

Sincerely,


R. A. Curnane, Vice President
Product Support Operations

RAC:DCM:Rad
attachments

A Raytheon Company

8008140424

ATTACHMENT

DOCKET NO. 99900510/80-01

NRC DEVIATION - UE&C CORRECTIVE ACTION

DEVIATION

A. Criterion V of Appendix B to 10CFR50 states:

"Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished".

Deviations from these requirements are as follows:

1. Contrary to this requirement, a procedure or instruction does not exist which prescribes UE&C's activities related to the identification, review, and subsequent notification of the client for items identified by UE&C as being reportable under the requirements of 10 CFR 50.55(e).

UE&C CORRECTIVE ACTION

Corrective action on this item was completed by UE&C prior to the conclusion of the inspection. UE&C need only address action to prevent recurrence in their response to this item.

ACTION TAKEN TO PREVENT RECURRENCE

A management training session was conducted covering the reporting requirements under 10CFR 50.55(e).

DATE OF CORRECTIVE ACTION COMPLETION

Action was completed on June 30, 1980.

- B. Paragraph II.A.2 of Quality Assurance Procedure QA-5 (Instructions, Procedures and Drawings) states in part that, "UE&C and vendor instructions, procedures and drawings are initiated, reviewed, approved, issued and revised to meet the requirements of ANSI N45.2.11 and ANSI N45.2.13."

Specific requirements and deviations therefrom are as follows:

1. Section II of procedure GAP-0014 (Document Control Center) states in part that, "Superseded issues of Controlled Documents must be destroyed, or marked void, by the holders of such documents . . .".

Contrary to the above, four(4) of eight(8) controlled structural engineering drawings examine in the Structural Engineering Discipline File were superseded, but were not destroyed nor marked void by the holder of the drawings.

With respect to Item B.1, all thirty-four(34) superseded drawings contained in the Seabrook Structural Engineering Discipline Files were replaced with the current revision during the inspection. A UE&C audit of all other Seabrook Project Drawing files performed during the inspection revealed no other superseded drawings.

UE&C CORRECTIVE ACTION

Corrective action was completed by UE&C prior to the conclusion of the inspection.

ACTION TAKEN TO PREVENT RECURRENCE

A Training Session was conducted to emphasize maintaining discipline files with current revisions of drawings and superseded documents destroyed or marked void.

DATE OF CORRECTIVE ACTION COMPLETION

Corrective action completed June 27, 1980.

B.2 Paragraph III.E of procedure GEDP-0013 (Preparation of Drawings) states in part that after a drawing is prepared, reviewed, comments incorporated and verified, "The drawing is then reviewed by the SDE (Supervising Discipline Engineer) and revised and/or approved and certified".

Contrary to the above, eight(8) of twenty-one(21) issued drawings examined were not certified.

With respect to Item B.2, Administrative Procedure AP-28 was revised during the inspection to only require certification of those drawings depicting ASME code items. All drawings depicting ASME Code items that were examined during the inspection were properly certified.

UE&C CORRECTIVE ACTION

Corrective action was completed by UE&C prior to the conclusion of the inspection.

ACTION TAKEN TO PREVENT RECURRENCE

The procedure GEDP-0013 (Preparation of Drawings) is being revised to require that drawings have SDE (Supervising Discipline Engineer) approval and certified when applicable. This revision does not require a change to AP-28.

DATE OF CORRECTIVE ACTION COMPLETION

The GEDP-0013 will be complete by July 25, 1980.

B.3 Section "GEDP-0013" of procedure AP-28 (Exceptions to General Engineering and Design Procedures) states in part that, "Seabrook drawings which require identification denoting nuclear class will be stamped with 'N-Stamp Item' or 'S-Safety Related Item'".

Contrary to the above, nine(9) of twenty-two(22) issued Seabrook drawings denoting nuclear class items were not stamped, nor otherwise identified, as an "N-Stamp Item" or an "S-Safety Related Item".

With respect to Item B.3, Administrative Procedure AP-28 was revised during the inspection to permit drawings depicting nuclear safety-related items to be identified as "Nuclear Safety-Related".

UE&C CORRECTIVE ACTION

Corrective action was completed by UE&C prior to the conclusion of the inspection.

ACTION TAKEN TO PREVENT RECURRENCE

The revision of Administrative Procedure AP-28 prevents recurrence of this deficiency. This action was discussed during a training session on June 27, 1980.

DATE OF CORRECTIVE ACTION COMPLETION

Corrective action completed June 27, 1980.

- C. Paragraph IV.A.2 of Quality Assurance Procedure QA-3 (Design Control) states in part that, "All design work is performed in accordance with UE&C Corporation General Engineering Design Procedures as specifically implemented for the Project by Administrative Procedures No. 28 and 29A."

Specific requirements and deviations therefrom are as follows:

1. Paragraph III.B.9b of procedure GEDP-0014 (Preparation of Design Specifications for Structures, Systems and Components (ASME B&PV Section III Division 1) states in part that, ". . . the only authorization that a vendor has to perform Technical Work is the Certified Design Specification accompanying the Purchase Order (or Change Notice). . . ."

Contrary to the above, change notice #14 to Purchase Order SNH-7 9763.006-246-1 authorized Pittsburgh DesMoines Steel Company to perform technical work on the Refueling Water Storage Tank without a certified design specification accompanying the purchase order change notice.

UE&C CORRECTIVE ACTION

With respect to Item C.1, Certified Design Specification 9763.006-246-1 was revised and issued during the inspection to reflect the changes in the technical work on (design changes) the Refueling Water Storage Tank.

ACTION TAKEN TO PREVENT RECURRENCE

The importance of updating Certified Design Specifications to reflect the changes in technical work has been emphasized in a project training session.

DATE OF CORRECTIVE ACTION COMPLETION

Corrective action completed June 27, 1980.

C.2 Paragraph III.B.4 of procedure GEDP-0014 states in part that, "The SDE (Supervising Discipline Engineer) will then review (the) Final Draft Specification and arrange a Project Level Design Review in accordance with GEDP-0022. . . .".

Contrary to the above, neither the SDE, nor anyone else, arranged for a Project Level Design Review in accordance with GEDP-0022 for six(6) examined specifications issued for ASME Code items.

UE&C CORRECTIVE ACTION

With respect to Item C.2, procedure GEDP-0014 was revised during the inspection to delete the mandatory requirement that all specifications for ASME items be subjected to a formal Project Level Design Review and to impose the requirement that the Supervising Discipline Engineer review all final draft specifications and arrange for their design verification in accordance with GEDP-0022, as is current UE&C practice.

ACTION TAKEN TO PREVENT RECURRENCE

Revision of the procedure will prevent recurrence of this item.

DATE OF CORRECTIVE ACTION COMPLETION

Corrective action complete.

C.3 Paragraph III.B.7 of procedure GEDP-0022 (Project Level Design Review and Design Verifications) states in part that, "The Design Specification cover sheet (after resolution of owners comments) shall be noted as Revision 0 - 'FOR CONSTRUCTION' . . .".

Contrary to the above, the cover sheet for six(6) issued design specifications examined did not exhibit the required notation; "Revision 0 - FOR CONSTRUCTION".

UE&C CORRECTIVE ACTION

With respect to Item C.3, Administrative Procedure AP-28 was revised during the inspection to exempt marking Seabrook Project Design Specifications "For Construction" after the "Owners" comments are resolved in accordance with current UE&C practice.

ACTION TAKEN TO PREVENT RECURRENCE

Revision of Administrative Procedure AP-28 will prevent recurrence of this item and it was discussed during a training session covering this change.

DATE OF CORRECTIVE ACTION COMPLETION

Corrective action completed June 27, 1980.

C.4 Paragraph IV.E.2.g of procedure QA-3 (Design Control) states in part that, "After internal review, the design specification is revised where appropriate, and submitted to the checker in accordance with GEDP-0022".

Contrary to the above, engineering procedure GEDP-0015 (Preparation of Design Specifications) does not impose the QA requirement that the specification be submitted to the checker (verifier) after internal review and revision.

UE&C CORRECTIVE ACTION

With respect to Item C.4, procedure GEDP-0015 was revised during the inspection to provide for final review of the final draft of Design Specifications by the independent design verifier prior to issue in accordance with current UE&C practice.

ACTION TAKEN TO PREVENT RECURRENCE

Revision of procedure GEDP-0015 will prevent recurrence of this item and conform to current UE&C practice. This revision was discussed during a training session.

DATE OF CORRECTIVE ACTION COMPLETION

Corrective action completed June 27, 1980.

D. Concerning instructions, procedures and drawings inspected on the WPPSS project:

1. WPPSS Projects Nos. 1 and 4 Project Procedures Manual, Procedure No. 21, Drawing Practices & Approvals, states in part in paragraph 4.12, Maintenance of Stick Files, "Upon receipt of revised prints, the outdated ones must be replaced. If outdated ones are kept for reference, they must clearly indicate they are not the latest revision and be physically separated from current drawings".

Contrary to the above, outdated drawings were not physically separated from current drawings on one stick file in Instrumentation and Control (I&C); also the same stick file did not have one currently approved drawing but instead had only the unsigned preliminary drawing of the next revision of the drawing.

Corrective and preventive actions were taken during the course of the inspection. No response is required.

D.2 UE&C QA Manual for WPPSS, Procedure QA-3, IIIc., states in part:

"The Discipline Supervising Engineer prepares System Descriptions from the appropriate section of the PSAR. These documents will designate referenced codes, ASME Section III Classification, Seismic classification, Quality Classification, and will be updated periodically and reissued."

Contrary to the above, implementing Project Procedure No. 28, System Descriptions, does not require System Descriptions to designate reference Codes and Standards, and therefore does not implement the above QA Manual requirements, and the systems descriptions for two I&C systems did not designate referenced codes. For example, the Containment Atmospheric Monitors (CAM) system descriptions did not include nine IEEE standards required by the PSAR and the Area Radiation Monitor system descriptions did not include all applicable standards.

UE&C CORRECTIVE ACTION

The requirement of Procedure QA-3 to list all applicable Codes and Standards in the SDD is an over-commitment and is being revised. The identification of all specific Codes and Standards applicable to the equipment is included in the procurement documents.

ACTION TAKEN TO PREVENT RECURRENCE

QA-3 will be revised to clarify that Codes and Standards generically applicable on a system basis will be referenced in the SDD. Also, in response to your Section III.B.3.a.(2), QA-3 will be revised to reflect the cancellation of PP-11 and the DDW.

DATE OF CORRECTIVE ACTION COMPLETION

Procedure QA-3 will be revised by August 15, 1980.

- E. WPPSS Nuclear Projects 1 & 4 Preliminary Safety Analysis Report (PSAR), Table 7.1-1 titled "Application of Criteria in the Design of Safety-Related Instrumentation Systems" requires application and use of IEEE Standard 382 (Guide for Type Test of Class I Electric Valve Operators) for Containment Atmospheric Monitoring Systems (CAM)".

Contrary to the above, application and use of IEEE Standard 382 was not required by the appropriate sections of the procurement documents for the CAM System. Specifically P.O. 9779-130Q, Section 15Q which includes CAM Hydrogen Analyzers with solenoid operated valves does not reference or impose the requirements of IEEE Standard 382.

UE&C CORRECTIVE ACTION

PSAR Table 7.1-1 is in error in specifying IEEE-382, as these conditions are not applicable to the CAM System, which is located outside containment.

ACTION TAKEN TO PREVENT RECURRENCE

PSAR Table 7.1-1 will be revised as part of the FSAR effort.

DATE OF CORRECTIVE ACTION COMPLETION

The PSAR Table 7.1-1 will be revised by September 15, 1980.