

Bechtel Power Corporation

Engineers — Constructors

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Gaithersburg, Maryland 20760
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September 24, 1980

Mr. U. 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 76012

Reference: Letter dated August 27, 1980; U. Potapovs, USNRC,
to J. M. Komes, Bechtel Power Corporation
Docket No. 99900519/80-02

Dear Mr. Potapovs:

This is in response to the referenced letter which transmitted the report of your inspection of the Gaithersburg Power Division Quality Assurance Program. The inspection was conducted by Mr. R. H. Brickley of your office on July 21-24, 1980.

The attachment to this letter contains our response to the deviation identified in your report.

Your Inspection Report No. 99900519/80-02 contains no information which we believe to be proprietary.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. M. Komes", with a long, sweeping horizontal line extending to the right.

J. M. Komes
Vice President and
General Manager

JMK:vpv

Attachment

8010270572

Attachment A
Letter 9/24/80
J.M. Komes to
U. Putapovs

NRC INSPECTION REPORT

No. 99900519/80-02

NOTICE OF DEVIATION

Criterion V of Appendix B to 10 CFR 50 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:

Bechtel's Procedure No. PDP-3 (Evaluation Procedure For As-Built Configuration of Nuclear Safety Related Piping Components) governs engineering activities being conducted for the Licensee under IE Bulletin 79-14.

Section IV (Criteria) provides acceptance criteria for determining system operability based on Code allowable hot stress values.

Contrary to the above, the engineering evaluation of the Main Steam System for operability was based on material test report values rather than Code values as required.

Bechtel Response

Corrective Action (Remedial)

Bechtel Procedure No. PDP-3 (Evaluation Procedure For As-Built Configuration of Nuclear Safety Related Piping Components for IE Bulletin 79-14) has been revised. Revision No. 2, Section IV, incorporated provisions to allow use of material test report values.

The subject procedure revision was approved and issued on July 28, 1980.

Action to Prevent Recurrence

Procedures for other GPD nuclear projects involved with the NRC IE Bulletin 79-14 are being reviewed for existence of a similar condition and are expected to be revised, if necessary, by October 31, 1980.