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Black & Veatch
Quality Assurance

B&V Project 0001
QA File 25.8000.21
September 12, 1980

Docket No.: 99900526/80-01

United States Nuclear Regulatory Commission,
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

Attention: Mr. Uldis Potapovs, Chief
Vendor Inspection Branch

Gentlemen:

The purpose of this letter is to respond to your letter of August 27, 1980 that transmitted Inspection Report No. 99900526/80-01.

We have examined the contents of the Inspection Report and have no objection to the information being placed in the Public Document Room in accordance with the Commission's Rules of Practice, Part 2, Title 10, Code of Federal Regulations.

The following are responses to the deviations identified in the Inspection Report.

A. The specific inaccuracies identified will be corrected prior to October 31, 1980.

Prior to the NRC inspection, project quality control activities had identified errors and inconsistencies in the Black Fox Station Drawing Index (as documented by NIR 6212QC53, PQCE Survey Report 6212-80-02, and PQCE memorandum dated July 22, 1980, 6212DIN35515). Project management had recognized that a problem existed and was in the process of formulating corrective action at the time of the NRC inspection. Based on the aforementioned PQCE activities, B&V acknowledges that the items identified in the NRC deviation are examples of index errors that are more widespread and in need of corrective action.

To provide corrective action and assure more uniform and accurate input to the Drawing Index the Black Fox project will: (a) issue revised Project Instructions which will include more definitive project requirements for the Drawing Index (completion date December 31, 1980), (b) provide training to key personnel with regard to index maintenance and new project unique requirements (completion date February 15, 1981), and (c) initiate a check of index information in accordance with the revised Project Instructions. The checking and correction effort will be followed by a PQCE survey of the Drawing Index to verify a satisfactory level of accuracy and uniformity. The PQCE survey will be completed by July 15, 1981.

B. The procedures for approval and issuance of Engineering Change Notices are included in QAN SP 3.10. Supplemental instructions for entering ECNs into the B&V Drawing Index are included in Project Instructions, Section 5. The only official purpose of the "log," as identified in the deviation report and briefly mentioned in SP 3.10, is to assure that each ECN is assigned a unique number; however, it is recognized that other information may be maintained in handwritten logs as a convenience in tracking the development and issuance of ECNs. The log itself is not utilized as a source of information for the official Drawing Index. The Index information is taken directly from the approved ECN. It is also recognized that certain fields in the Drawing Index are of questionable applicability for all of the different types of documents entered into the Index. For example, an ECN does not truly have a "revision date" since ECNs are never revised after issuance, but are ultimately "closed out" when the parent document is revised. Because of this fact, B&V believes that the unique number assigned each ECN provides adequate identification and that no design problems should occur because of revision date confusion. However, to minimize future audit concerns, a Project Management directive will be issued prior to September 30, 1980 defining the revision date of an ECN as the date of approval. Other log errors identified by the NRC have been corrected and/or verified as correct by PQCE examination (F. R. Rollins memorandum to file dated September 11, 1980).

An audit of change control procedures and implementation for the Black Fox Station project will be initiated by the B&V QA Group during September, 1980. The audit will cover, among other subjects, various activities related to ECN issuance, distribution, and status reporting and will help define the need for any supplemental procedures or additional corrective action. The audit report is expected to be completed prior to October 31, 1980.

Additional corrective action to avoid recurrences of the subject deviation will depend on results of the audit discussed above. However, the corrective action identified as item 3 for Deviation A is also applicable to this deviation. In addition, either QAN SP 3.10 and/or the Project Instructions will be revised to more clearly define minimum requirements for ECN logs. The revised procedures will be issued prior to December 31, 1980.

C. The PSAR sections identified in the deviation are part of Revision 2 Interim Containment Loads Report (ICLR) as issued by General Electric for the standard Mark III containment. Proposed draft revisions for the specific items identified in the deviation report will be submitted to Licensing prior to October 31, 1980.

PQCE Survey Report 6212-80-04 issued July 25, 1980 (6212DIN 35257) identified specific elements of Section 8 of the Project Instructions that need revision to more accurately define the responsibility for initiating proposed changes to the PSAR.

Section 8 of the Project Instructions will be revised to clarify the responsibilities and the timing requirements for revising the PSAR to reflect actual BFS design. The revision will be issued prior to December 31, 1980. In addition, compliance of design with SAR commitments is periodically monitored through both audits and surveys.

D. The SDS identified in Section III paragraph C.3.a of the Inspection Report referenced GE Design Specification Data Sheet 22A3139AT as an applicable interface document. In a subsection entitled "Valve Response Time Requirement," the data sheet specifies a maximum closing time for RHR valve F053, which is identified as a 12 inch, Schedule 80 valve. Black & Veatch design conformed to the GE closing time requirement, but based on high calculated fluid velocity the size of the subject piping and related valves was increased to 14 inches. This was done in accordance with a note on GE P&IDs that indicates that the piping designer shall size the pipes in conformance with the system design specification and process diagram. Nevertheless, subsequent to the NRC inspection, Black & Veatch initiated a letter on August 11 (6212DIN35378) and solicited formal GE review and response on the subject valve sizing.

PQCE Survey Report 6212-79-07 documents the findings of a survey directed toward design interface control with selected NSSS requirements. Based on the positive results of this survey and the nature of the item identified in the NRC deviation, Black & Veatch does not believe that further investigation of the subject is necessary except as discussed in the following paragraph.

When the General Electric response to B&Vs August 11 letter is received, the Manager-Design and the Project Quality Control Engineer will evaluate the need for any further corrective action. The results of this evaluation will be documented by memorandum for future NRC examination.

Item B.4 of Details Section I of the Inspection Report mentions that Deviation D and an unresolved item from Report 79-02 were left open due to lack of available documentation. A memorandum covering these subjects was written on September 9, 1980 and will be available for examination during your next inspection.

If you have any questions concerning the above matter, please contact our Quality Assurance Manager, Mr. R. E. Blaisdell.

Very truly yours,

BLACK & VEATCH

P. J. Adam
Executive Partner
Head of Power Division

FRR:la