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September 15, 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. 80-02, dated August 18, 1980

Dear Mr. Potapovs:

In response to your letter to Mr. B E Tenzer dated August 18, 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 Deviation."

ITEM A

QA Program Implementing Procedures for IE Bulletin Work

The NRC finding, as written, is not totally accurate in that there were two procedures used on the IE 79-14 work. These procedures address the Stress Analysis review and the evaluation of Support and Restraints. The first procedure noted was issued on 10/26/79. It appears that the NRC is referring to the second procedure referred to above in their letter. The second procedure was essentially complete in January of 1980, and accurately describes the work performed by the Pipe Restraint/Support group. Prior to January, a draft procedure - which was really an instruction sheet - dated 10/23/79 had been used describing the Support/Restraint group responsibilities. Therefore, there is evidence that written instructions and/or procedures were indeed available prior to 7/16/80.

For future contracts on IE Bulletin type work, Ebasco will apply the formal "Ebasco IE Compliance Support Program," dated December 20, 1979. This program requires the identification of all implementing procedures which will govern the task. This includes the approved applicable Ebasco procedures - Administrative, Engineering, Quality Assurance, and Licensing. It will also include those Project-unique documents and procedures required to provide total technical compliance, including the procedure defining the time frames and responsibilities for evaluating nonconformances. The Project-unique procedures may be transferred from prior projects, where they proved effective, or may be new procedures specifically generated to respond to a requirement of an IE Bulletin.

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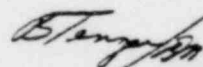
ITEM B

Approval and Amendment of SAR Contents

In reference to the question of using a seismic damping value other than that specified in the St. Lucie Unit No. 1 FSAR, we concur that this is a departure from the described critical damping values in FSAR paragraph 3.7.1. The adoption of the 2% damping instead of the 0.5% was prompted by the NRC Regulatory Guide 1.61 and the fact that St. Lucie #2 FSAR specifies 2% on critical damping values for small piping under Safe Shutdown Earthquake. However, this departure should have been reported to the appropriate channels.

Ebasco Nuclear Licensing Department Procedure L-3, entitled "Processing SAR Change Requests," primarily addresses the responsibilities of Licensing Engineers in the review and approval of changes to an SAR. The responsibilities of Lead Discipline Engineers are addressed in Engineering Department Procedure E-26. To strengthen the controls on the cognizant engineer who is responsible for initiating the change, increased auditing to Engineering Procedure E-26, "Preparation of Safety Analysis Reports and Establishment of Design Base for Nuclear Power Plants," will be scheduled and its requirements will be monitored during QA audits of Engineering departments to provide preventive action. Ebasco has instituted a training program covering the implementation of all Engineering Procedures referred to in its Topical Report. E-26 is one of the procedures. The training program is currently being implemented which should preclude this type of finding from recurring.

Very truly yours,



Benjamin E Tenzer

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cc: B R Mazo