

The Light company

Houston Lighting & Power P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

September 18, 1980
ST-HL-AE-533
SFN: C-0510

Mr. Karl Seyfrit
Director, Region IV
Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

Dear Mr. Seyfrit:

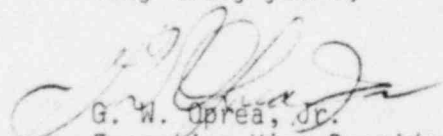
South Texas Project
Units 1&2
Docket Nos. STN 50-498, STN 50-499
Commitments Made at the Public Meeting
and in the Response to the Order to Show Cause

In accordance with our agreement transmitted herewith is a listing of the commitments made by Houston Lighting & Power Company in the response to the Order to Show Cause submitted July 28, 1980, and during the Public Meeting held August 19, 1980. This document is used internally by our project staff and provides a means for tracking the status of the commitment by date, and responsible person.

The items have also been classified into three categories. These are management commitments (M) and auditable items (A) presented in the Show Cause Response and verbal commitments (H) made to the NRC at the Public Meeting.

If there are any questions, please contact Mr. J. W. Briskin at (713) 676-8799.

Very truly yours,


G. W. Oprea, Jr.
Executive Vice President

PLW/pjb
Attachment

810 1270 878

Houston Lighting & Power Company

September 18, 1980

ST-HL-AE-533

SFN: C-0510

Page 2

cc: D. G. Barker
C. L. McNeese
H. R. Dean
R. L. Waldrop
D. R. Beeth
J. D. Parsons
A. J. Granger
R. A. Frazar
M. D. Schwarz (Baker & Botts)
R. Gordon Gooch (Baker & Botts)
J. R. Newman (Lowenstein, Newman, Reis, Axelrad & Toll)

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
H1	Mr. Oprea and Mr. Grote on distribution for a number of QA Reports. Ref: Page 54		Due Date <u>10/5/80</u>	Resp: R. A. Frazar W. J. Friedrich	Status: HL&P 10/5/80 : B&R 9/30/80
H2	Mr. Grote will spend 90% of his time on STP, and he will visit the Site on a regular basis. Ref: Page 51, 54, & 55		Due Date <u>N/A</u>	Resp: S. E. Grote	Status: On-going
H3	QAMRB Meetings to be held on Site. Ref: Page 56		Due Date <u>N/A</u>	Resp: R. J. Wurpillat, Jr.	Status: Meetings have been started and are on-going.
H4	B&R Corporate QA Manager to make a report once a month to the operating committee and board of B&R concerning the status of the STP QA Program. Ref: Page 56		Due Date <u>N/A</u>	Resp: R. J. Wurpillat, Jr.	Status: First report made on 9/3/80 and will continue to be made monthly.
H5	Establish system to track each Show Cause Commitment and supply to NRC a timetable so they can schedule their inspection consistent with schedule for work development. Ref: Page 58 - 59		Due Date <u>9/19/80</u>	Resp: J. W. Briskin	Status: Response to Show Cause Order has been reviewed and commitments identified. This schedule and its status are under review and will be transmitted to the NRC the week of September 15, 1980.
H6	Provide update of FSAR Chapter 17 describing new organization and in addition a comparison to previous organization including reporting system, number and type of classification of people. Ref: Page 60 & 67		Due Date <u>11/1/80</u>	Resp: R. A. Frazar	Status:
H7	Coordinators from Construction and QA assigned for complex concrete pours. Ref: Page 63		Due Date <u>9/15/80</u>	Resp: R. E. Leasburg W. J. Friedrich	Status:
H8	AWS Welding Procedures have been revised, ready to requalify welders, and have completed much of the personnel training. Ref: Page 64		Due Date <u>N/A</u>	Resp: R. E. Leasburg W. J. Friedrich	Status: Personnel training has been completed and the requalification of welders has started.

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
H9	At the restart of AWS welding, work will be overseen by certified Level III Examiner. Ref: Page 65		Due Date <u>N/A</u>	Resp: W. J. Friedrich	Status: This will be an ongoing program during the Welding Restart Program.
H10	Provide to NRC a schedule of outstanding commitments concerning welding. Ref: Page 66 - 67		Due Date <u>9/12/80</u>	Resp: M. D. Miscente	Status: To be provided in meeting with NRC on 9/12/80.
H11	Provide to the NRC a graphical presentation of the kind of people and qualifications that existed prior to the change and then what changes are being made so NRC can have a better understanding of what has been done and better track how things are going in future. Ref: Page 67 - 68		Due Date <u>11/1/80</u>	Resp: R. A. Frazar W. J. Friedrich	Status:
H12	Provide to NRC the results of analysis of Bechtel/MAC recommendations. Ref: Page 74		Due Date <u>9/26/80</u>	Resp: G. W. Oprea, Jr.	Status:
H13	All construction procedures revised in new format with input from Crafts/QA by end of November. Ref: Page 77		Due Date <u>11/28/80</u>	Resp: R. H. Leasburg K. R. Cook	Status: Concrete procedures implemented 7/21/80. Remaining of procedures in various state of revision and are scheduled for completion by 11/28/80.
H14	Schedules will be established whereby in a timely manner QC Inspectors/Craftsmen will receive adequate training on revised procedures, (prior to procedure implementation). Ref: Page 78 & 80		Due Date <u>N/A</u>	Resp: R. H. Leasburg W. J. Friedrich	Status: This is a requirement in Procedure GCP-1 prior to implementation of each revised procedure. This is also a requirement of the Quality Assurance Plan Section 6.1.
H15	Provide NRC the EL&P Quality Assurance and Quality Control Organizations staffing levels, how we arrived at them, what was the criteria for arriving at those numbers. Ref: Page 95 - 96		Due Date <u>9/15/80</u>	Resp: R. A. Frazar	Status: The staffing are complete, however the final report listing the criteria used in developing those levels will be complete by 9/15/80.

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
H16	Provide NRC with decision on frequency of audit by outside consultant. Ref: Page 104		Due Date <u>2/81</u>	Resp: G. W. Oprea, Jr.	Status: Next audit to be early first quarter 1981. Schedule for subsequent audits to be determined at that time.
H17	Check qualifications of construction personnel now working on Site. (Construction Supervisory Personnel) Ref: Page 109 - 113		Due Date <u>1/16/81</u>	Resp: J. R. Geurts	Status: In work
H18	Provide to NRC the recommendations of dynapac compaction equipment. Ref: Page 115		Due Date <u>9/15/80</u>	Resp: R. E. Leasburg	Status: Transmitted to the NRC Ref: SI-HL-AE-530, dated 9/9/80
H19	Provide additional information to Show Cause Item 2.B, addressing the question of foundation settlement. Ref: Page 118		Due Date <u>11/10/80</u>	Resp: J. L. Hawks C. B. Pettersson	Status: Meeting scheduled for 10/7/80 between B&R/WCC to discuss settlement B&R is awaiting detailed questions from the NRC as discussed at the Public Meeting.
H20	Provide NRC with copy of PDCN to backfill TRD (Rev. B) and issue DCN within 4-6 weeks. Ref: Page 125		Due Date <u>10/1/80</u>	Resp: J. L. Hawks C. B. Pettersson	Status: PDCN 7/21/80 issued for comments. DCN to follow resolution of comments.
H21	Final report to be available mid-October regarding the work of the Independent Review Committee in the soils area. Ref: Page 126		Due Date <u>11/30/80</u>	Resp: J. L. Hawks C. B. Pettersson	Status: Change in schedule due to the compiling and evaluation of the data for the final sections of the report is more time consuming than earlier anticipated.
H22	Complete mapping of the backfill construction activities by mid-September and issue final report by mid-October. Ref: Page 127		Due Date <u>10/15/80</u>	Resp: J. L. Hawks C. B. Pettersson	Status: Data evaluation is continuing but final statistical analysis is pending.
H23	Modified the documentation systems for AWS welding such that verification can be made of inspectors performing in process checks on AWS welding. Ref: Page 143		Due Date <u>N/A</u>	Resp: W. J. Friedrich	Status: Complete

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
H24	Socket welds to be 100% reinspected. Ref: Page 145		Due Date <u>11/14/80</u>	Resp: M. D. Muscente W. J. Friedrich	Status:
H25	Manager of welding to issue monthly a written report regarding status of welding, problems being incurred, and actions being taken. Ref: Page 156		Due Date <u>10/1/80</u>	Resp: M. D. Muscente	Status:
H26	Provide a copy of welding task force report to HL&P for transmittal to NRC. Ref: Page 156		Due Date <u>9/12/80</u>	Resp: M. D. Muscente	Status: To be provided in meeting with NRC on 9/12/80.
H27	Obtain copy of Public Law 96-295. Evaluate for possible incorporation into appropriate documents. Ref: Page 159		Due Date <u>10/1/80</u>	Resp: R. A. Frazar	Status:
H28	Review NCR Procedure to see if clarification is needed in cases were inspectors cannot obtain acknowledgement of NCR from construction. Ref: Page 165		Due Date <u>9/15/80</u>	Resp: W. J. Friedrich	Status:
H29	Each month the Project QA Manager is to present to QAMRB a status of each outstanding ADR, (i.e. how long its been open and how long it is overdue). In addition NCR's & CAR's substantially past their due date will be presented. Ref: Page 174 - 175		Due Date <u>10/80</u>	Resp: W. J. Friedrich	Status:
H30	All design changes will be documented on a Design Change Notice (DCN). Ref: Page 177		Due Date <u>10/1/80</u>	Resp: J. L. Hawks	Status:

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
E31	All B&R/HL&P Audit Reports, including Vendor Audits Reports are being sent to G. W. Oprea, W. M. Rice and S. H. Grote for review. Ref: Page 182		Due Date <u>9/8/80</u>	Resp: R. L. Ulrey R. W. Bass	Status: Complete. HL&P: Audit Reports will continue to sent to Executive Management. B&R: Distribution List for B&R has been revised to include these personnel for all future audit reports.

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
M1	PQAS will assess the Quality Engineering and inspection functions of B&R by performing mini-audits, reviews and approval of procedures and observation of work activities in the field. Ref. Para: 1 - 11 (1)		Due Date <u>10/1/80</u>	Resp: R. A. Frazier	Status: The reviews and approval of procedures and observation of work activities has been implemented. The procedures for minor audits will be completed by 10/1/80 and that activity will be started. This will then be an on-going function.
M2	Review has been made of the qualifications of all key QA personnel within HL&P/B&R by Bechtel and MAC. Ref. Para: 1 - 16 (4)		Due Date <u>8/4/80</u>	Resp: G. W. Oprea, Jr.	Status: Complete.
M3	Trending various types of deficiencies will reflect any significant failures to comply with procedural requirements, and provide management with information on which to base continued improvements in training. Ref. Para: 1 - 18 (1)		Due Date <u>1/31/81</u>	Resp: W. J. Friedrich J. Purdy	Status: Part of the Trending Program
M4	B&R audit group to add five additional personnel to augment Audit Staff (NUS/SAI). Ref. Para: 1 - 19 (2)		Due Date <u>1/1/81</u>	Resp: R. W. Bass	Status: Site is authorized a total 15 auditors, Houston Office 15 auditors.
M5	A requirement has been established for periodic meetings at the Site which will be attended by key upper and middle management personnel of HL&P/B&R. Each meeting will include a report on the status of the QA program highlighting Quality problems, trends, etc. Ref. Para: 1 - 20 (2)		Due Date <u>N/A</u>	Resp: W. J. Friedrich	Status: Initiated and is an on-going activity. Monthly meetings have been held since July 1980 with B&R QAMRB and G. W. Oprea and Staff in attendance.
M6	With Senior Officers of B&R acting as an Oversight Committee and Line Managers comprising a Steering Committee the Corporate Committee to Quality improvements will be expressed through training and indoctrination and innovative programs. Ref. Para: 1 - 20 (3)		Due Date <u>N/A</u>	Resp: K. M. Broom	Status: Item complete. Mr. C. Snyder heads the Steering Committee. Messrs Rice, Grote, Bazor, Salterillo, and Dr. Broom comprise the Oversight Committee. These functions shall be ongoing for the life of the project.

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
M7	The Independent Review Committee has evaluated the field and laboratory data and has presented conclusions in interim report. Final evaluation will be presented in a comprehensive report upon conclusion of all planned studies related to Cat. 1 Structural Backfill. Ref. Para: 2 - 11 (2)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks C. B. Pettersson	Status: Final committee report is pending completion of all task force activities, providing information about the backfill.
M8	A comprehensive engineering study is being made of construction conditions, placement sequence and testing of Cat. 1 Structural Backfill placed at STP. Ref. Para: 2 - 17 (2)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks C. R. Pettersson	Status: See Commitments No. M-7 and A-20. Part of Final Comprehensive Report.
M9	Locations and sequence of various Cat. 1 backfill placements and correspondence in-place density test results will be documented for units 1 & 2 together with summaries of the report construction methods and conditions. Specifically placements in support of the foundations for F.E.B., M.E.A.B., and D.G.B. as well as backfill surrounding these buildings and against R.C.B. The bedding and backfill for the essential cooling water system piping are also to be included. Ref. Para: 2 - 18 (3)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks J. B. Pettersson	Status: See Commitments No. M-7 and A-20. Part of Final Comprehensive Report.
M10	An evaluation will be made of the validity and representativeness of the in-place density test data based on the inspection reports, considering the reported construction methods, sequence, and conditions. Ref. Para: 2 - 19 (2)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks C. B. Pettersson	Status: See Commitments M-7 and A-20. Part of Final Comprehensive Report.
M11	Statistical analyses will be performed using in-place density test results. Ref. Para: 2 - 19 (3)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks C. B. Pettersson	Status: See Commitment M-7 and A-20. Part of Final Comprehensive Report.

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
M12	A comprehensive evaluation is being performed of FSAR Section 2.5.4. Ref. Para: 2 - 33 (1)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks C. B. Pettersson	Status: Submit -- licensing by due date.
M13	Based on the evaluation completed to date an FSAR Amendment will be submitted to clarify the description of the construction process. Ref. Para: 2 - 33 (1)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks C. B. Pettersson	Status: Submittal to licensing by due date.
M14	A complete review of Earthwork Inspection Reports is being performed to further verify compliance with the construction and inspection requirements. Ref. Para: 2 - 35 (3)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks	Status: See Commitment No. M-7 and A-20. Part of Final Comprehensive Report.
M15	FSAR Subsection 2.5.4.5.6.2.4 will be revised. Ref. Para: 2 - 36 (2)		Due Date <u>9/15/80</u>	Resp: A. H. Geisler	Status: Amendment 12 incorporates this change and shall be transmitted under SI-EL-AE-527.
M16	FSAR Subsection 2.5.4.5.6.2.5 will be revised. Ref. Para: 2 - 36 (2)		Due Date <u>9/15/80</u>	Resp: A. H. Geisler	Status: Amendment 12 incorporates this change and shall be transmitted under SI-EL-AE-527.
M17	A comprehensive program to re-assess and verify safety related welding at SIP, and to determine whether the safety related work completed was properly performed.		Due Date <u>7/7/80</u>	Resp: J. L. Hawks I. J. Natarjan	Status: Complete. See DCN 7/3/80 to IRD 5A700GP004.
M18	The task force (safety-related welding) will establish a schedule for any repair work as a result of discrepancies identified during review. Ref. Para: 3a - 1 (2)		Due Date <u>9/12/80</u>	Resp: D. Miscente	Schedule for inspection and repair to be provided in meeting with NRC on 9/12/80.
M19	The Task Force (safety-related concrete structures) will establish schedule on any repair work. Ref. Para: 3b - 2 (1)		Due Date <u>N/A</u>	Resp: J. L. Hawks G. R. Murphy	Status: No repair work identified to date.

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
M20	RCB's (Unit 1 & 2) Review to be completed by September 15, 1980 as revised by letter SI-EL-AE-521. Ref. Para: 3b - 2 (2)		Due Date <u>9/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Review Only: Does not include evaluation. Evaluation will be included in Final Report.
M21	MEAB (Unit 1 & 2) Review to be completed by October 15, 1980 as revised by letter SI-EL-AE-521. Ref. Para: 3b - 2 (2)		Due Date <u>10/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Review Only: Does not include evaluation. Evaluation will be included in Final Report.
M22	FEB (Unit 1 & 2) Review to be completed by November 15, 1980 as revised by letter SI-EL-AE-521. Ref. Para: 3b - 2 (2)		Due Date <u>10/31/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Review Only: Does not include evaluation. Evaluation will be included in Final Report.
M23	Sampling by coring, chipping and boring in Unit 1 RCB will be accomplished in next two weeks. (August 12, 1980) Ref. Para: 3b - 4 (3), 3b - 5 (1)		Due Date <u>8/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Complete. Ref: SI-EL-AE-513
M24	A status report by the Task Force will be submitted to NRC I&E Region IV by August 15, 1980. Ref. Para: 3b - 5 (1)		Due Date <u>8/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Complete. Ref: SI-EL-AE-513
M25	Documentation review for Unit #2 RCB is scheduled to be finished in the next month. Ref. Para: 3b - 8 (2)		Due Date <u>8/1/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Complete. Evidence of review documented on Document Review Checklist.
M26	Testing on Unit 1 RCB is expected to be complete by August 12, 1980. Ref. Para: 3b - 12 (2)		Due Date <u>8/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Complete. Ref: SI-EL-AE-513

SHOW CAUSE COMMITMENTS

ITEM NO	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
M27	Brochure is being replaced with a new QA program brochure approved by HL&P that reflects the fundamental philosophy of 10CFR50 Part 50 App. "B". Ref. Para: 4 - 1 (2)		Due Date <u>8/1/80</u>	Resp: K. M. Broom	Status: <u>Complete</u> . Text of the new brochure was provided with response to Show Cause Order.
M28	New seminars for construction and Q.C. personnel on objectives and standards of HL&P/B&R QA Programs as they relate to SIP will be commenced promptly. Ref. Para: 4 - 1 (2), 4 - 2 (1)		Due Date <u>N/A</u>	Resp: K. M. Broom	Status: <u>Started and on-going</u> .
M29	Procedures defining stop work authority (HL&P & B&R) will be issued for use by August 15, 1980. Ref. Para: 5 - 5 (3)		Due Date <u>8/15/80</u>	Resp: R. A. Frazar W. J. Friedrich	Status: <u>HL&P</u> Procedure PSQP-A7 issued defining "Stop Work" authority. Status: <u>B&R</u> Procedure QAP-15.2 issued 8/15/80.
M30	Necessary procedures describing the Inspection Report System and Material Review Board will be issued in September, 1980. Ref. Para: 6 - 8 (3)		Due Date <u>9/30/80</u>	Resp: W. J. Friedrich	
M31	Attempt to expedite ANI Review of Q.A. Manual will be made. Ref. Para: 6 - 8 (3)		Due Date <u>N/A</u>	Resp: J. R. Geurts	Status: <u>Will be started</u> when QAM is revised.
M32	Detail procedures for DAG will be finalized in mid-August, 1980. Ref. Para: 6 - 11 (1)		Due Date <u>8/15/80</u>	Resp: W. J. Friedrich	Status: <u>Complete</u> . QAP 15.4, "Trend Analysis", was issued on 8/15/80.
M33	Personnel training in DAG procedures will be conducted and procedures implemented in early September, 1980. Ref. Para: 6 - 11 (1)		Due Date <u>8/29/80</u>	Resp: W. J. Friedrich	Status: <u>Complete</u> . Training was held on 8/29/80, however training is an ongoing activity for the life of the project.

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
M34	DAG First Quarterly Report is expected to be issued for fourth quarter 1980. Ref. Para: 6 - 11 (1)		Due Date <u>1/31/81</u>	Resp: W. J. Friedrich	Status: Report for last quarter of 1980 will be issued by 1/31/81.
M35	A Change Review Board will be established within B&R Engineering, both at the Site and Houston Office. Ref. Para: 7 - 4 (2)		Due Date <u>10/1/80</u>	Resp: J. L. Hawks	
M36	The Engineering Project Manager will appoint a chairman at each location. Ref. Para: 7 - 4 (2), 7 - 5 (1)		Due Date <u>10/1/80</u>	Resp: J. L. Hawks	
M37	All procedures for control of field changes will be issued by August 29, 1980. Revised to October 1, 1980. Reference ST-AE-520. Ref. Para: 7 - 8 (3)		Due Date <u>10/1/80</u>	Resp: R. W. Peverley	Status: Pending.
M38	Training seminar is being prepared and will be presented to all B&R members who participate in this program. Ref. Para: 7 - 8 (4)		Due Date <u>10/1/80</u>	Resp: R. W. Peverley	Status: Pending.
M39	Instructions for implementation Q.A. Records will be issued by August 1, 1980. Ref. Para: 8 - 4 (3)		Due Date <u>8/1/80</u>	Resp: W. J. Friedrich	Status: Complete.
M40	Completed generic checklist for all safety-related records will be in use by November 1, 1980. Ref. Para: 8 - 4 (3)		Due Date <u>11/1/80</u>	Resp: W. J. Friedrich	
M41	On-site microfilming capability will be in place and staffing and training complete by January 31, 1981. Ref. Para: 8 - 4 (3)		Due Date <u>10/1/80</u>	Resp: W. J. Friedrich	
M42	B&R will increase the number of Resident Site Auditors. Ref. Para: 9 - 3 (4), 9 - 4 (1)		Due Date <u>1/81</u>	Resp: R. W. Bass	Status: See Commitment No. M-4.

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
A1	Computer printout of results of Bechtel Audit are available at SIP Site. Ref. Para: 1 - 4 (2)		Due Date <u>N/A</u>	Resp: R. A. Frazar W. J. Friedrich	Status: Complete.
A2	Off-site corporate audit function has been augmented for purpose of increasing number of periodic independent audits. Ref. Para: 1 - 10 (2)		Due Date <u>8/22/80</u>	Resp: R. L. Ulrey	Status: "MAC" personnel have been added to assure the increased audit activities are implemented.
A3	Discipline HL&P QA Supervisor will determine the extent of Quality Control Inspections and prepare necessary checklist. Ref. Para: 1 - 11 (1)		Due Date <u>1/81</u>	Resp: R. A. Frazar	
A4	Quality Systems Organization has responsibility for preparing QA procedures analyzing B&R trend data and analyzing audit findings. Ref. Para: 1 - 11 (2)		Due Date <u>11/1/80</u>	Resp: R. A. Frazar	
A5	Quality Systems Organization will be responsible for providing coordination and control for all HL&P QA Training and Indoctrination Sessions. Ref. Para: 1 - 12 (1)		Due Date <u>11/1/80</u>	Resp: R. A. Frazar	
A6	HL&P QC group to perform inspection of selected hold points within B&R QC inspection program as defined on checklist provided by Discipline QA. Ref. Para: 1 - 12 (3)		Due Date <u>1/81</u>	Resp: R. A. Frazar	
A7	Discipline Quality Engineers have been assigned responsibility for controlling all Q.A. activities related to their individual specialities. Ref. Para: 1 - 14 (b)		Due Date <u>1/81</u>	Resp: W. J. Friedrich	Status: a) Organization definition complete b) QAM Section 1 in review/comment cycle. c) QEI-1, Quality Engineering instruction on organization drafted for review. d) Staffing in process.

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
A8	B&R Q.A.E. are responsible for performance of: a) Document Reviews b) P. O. Reviews; c) Nonconformances; and d) preparation of Inspection Checklist. Ref. Para: 1 - 14 (3)		Due Date <u>1/81</u>	Resp: W. J. Friedrich	Status: In process - full implementation upon complete staffing.
A9	Inspectors are advised of the Disposition of Findings (NCR's) Ref. Para: 1 - 15 (2)		Due Date <u>10/15/80</u>	Resp: W. J. Friedrich	Status: <u>SI-QAP-15.1</u> in draft; <u>SI-QAP-2.6</u> and <u>QEI-15</u> ready for use.
A10	Upper level management of HL&P will also participate directly in all aspects of the project, including QA functions. Frequent on-site visits and meetings to review progress and problems will be conducted. Ref. Para: 1 - 16 (2)		Due Date <u>N/A</u>	Resp: G. W. Oprea, Jr. K. M. Broom	Status: On-going - all upper management have committed to frequent periods of time. Many meetings with QA Construction and Engineering have occurred since June 1980.
A11	HL&P Executive V. P. will also participate in periodic meeting of the B&R Q.A. Management Review Board. Ref. Para: 1 - 16 (3)		Due Date <u>N/A</u>	Resp: G. W. Oprea, Jr.	Status: On-going - Mr. Oprea has attended the monthly QAMRB meetings at the Job Site since July 1980.
A12	Review has been made of the qualifications of all key QA personnel within HL&P/B&R by Bechtel and MAC. Ref. Para: 1 - 16 (4)		Due Date <u>8/4/80</u>	Resp: G. W. Oprea, Jr.	Status: <u>Complete</u>
A13	B&R will continue to upgrade qualifications of its QA/QC Management Team. Upgrading to be accomplished by formal and informal training activities and counseling of individuals. Ref. Para: 1 - 17 (2)		Due Date <u>N/A</u>	Resp: K. M. Broom	Status: <u>Started and on-going.</u>
A14	Technical Training Programs for QA/QC personnel to ensure full knowledge of procedural requirements have been and will continue to be conducted. Ref. Para: 1 - 17 (3)		Due Date <u>9/15/80</u>	Resp: K. M. Broom	Status: On-going <u>SI-QAP-2.1, 2.2, and 2.3</u> revision by 9/15/80/.

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
A15	Program of retraining Inspectors and Crafts is currently underway. Ref. Para: 1 - 19 (3)		Due Date <u>1/1/81*</u>	Resp: R. H. Leasburg W. J. Friedrich	Status: Required by GCP-1 and ST-QAP-6.1; encompasses all procedures developed and revisions to procedures. *For Crafts
A16	Quality Engineers are establishing the necessary training programs to update construction and QC personnel on newly established Quality requirements. Ref. Para: 1 - 19 (3)		Due Date <u>1/1/81</u>	Resp: W. J. Friedrich	Status: See A15 above.
A17	In area of revised procedures, indoctrination and training sessions are underway to educate personnel on changes in QA procedures, organization interfaces and responsibilities. Ref. Para: 1 - 19 (3)		Due Date <u>1/1/81</u>	Resp: R. H. Leasburg W. J. Friedrich	Status: See A15 above.
A18	A requirement has been established for periodic meetings at the site which will be attended by key upper and middle management personnel of HL&P/B&R. Each meeting will include a report on the status of the QA program highlighting Quality problems, trends, etc. Ref. Para: 1 - 20 (2)		Due Date <u>N/A</u>	Resp: D. G. Barker J. R. Geurts	Status: Started and on-going.
A19	The QA programs of HL&P are being revised to include an annual audit by an independent consultant. Ref. Para: 1 - 21 (1)		Due Date <u>10/1/80</u>	Resp: R. A. Frazar	
A20	B&R/HL&P Cat. 1 structural backfill task force identified the following reviews to be performed. a) Reconfirm the adequacy of the construction methods used during Cat. 1 structural backfill placements.		Due Date <u>12/15/80*</u>	Resp: J. L. Hawks C. B. Pettersson	Status: *Complete response items 2 and 10 a) Evaluation complete: Ref. committee interim report and response to Item 2a. The backfill test fill results were issued for review (PDCN) 7/21/80.

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
	<p>b) Comparison of backfill material tested for the engineering design studies with material actually placed.</p> <p>c) Plan views and profiles to show the sequence of backfill placements and lift thickness.</p> <p>d) Review of all earthwork inspection reports.</p> <p>e) Statistical analysis of the in place density test to determine the postulated density distribution.</p> <p>f) Determination of the relative density requirements of the backfill.</p> <p>g) Analysis of the significance of density distribution within the surface lift, immediately below Cat. 1 structural foundations.</p> <p>h) Review of previous boring program results for evaluation of the engineering adequacy of the backfill.</p> <p>i) Comparative determination of max/min laboratory density test results by an independent laboratories.</p> <p>j) Evaluation of all data concerning generic or specific problem with construction & quality control programs.</p> <p>Ref. Para: 2 - 3 (2)</p>				<p>b) Complete, Ref. response to Item 2b.</p> <p>f) Specific low density indication have been evaluated (Ref. Committee Interim Report). The generic problem with the "Statistical Tail" will be studied by WCC and the committee.</p> <p>g) Complete. Ref. Committee Interim Report.</p> <p>h) Complete: Ref. WCC Boring Report and Committee Interim Report. A closure report is being prepared by WCC.</p> <p>i) Complete: Ref. Table of Committee Interim Report and Table B-9 3A700GP001-A PDCN 7/21/80.</p>

SHOW CAUSE COMMITMENTS

ITEM NO	COMMITMENT	REF. PARA.	DUE DATE RESPONSIBILITY STATUS
A21	<p>An independent review was established to:</p> <ul style="list-style-type: none"> a) Review laboratory test and design analyses performed on the backfill concerning liquification and settlement. b) Reviewing the recommendations and criteria for compaction of the backfill as documented in reports issued by WCC. c) Reviewing the construction specification and procedures for compaction of the backfill (including methods used in field) d) Reviewing the prescribed and implemented inspection and testing procedures for compaction control of the backfill placement; including QC methods and documentation implemented in the field. e) Reviewing and analyzing compaction Quality Control Test results collected and documented covering the construction period from 1976-1980. f) Reviewing the results of special investigations of placed backfill to assess adherence to design requirements including the results of the test boring program performed in Spring 1980. g) In event of low density pockets are delineated in the backfill, reviewing the efficiency of the methods proposed by B&R engineering to treat those pockets to bring them in accordance with design requirements. 		<p>Due Date <u>12/15/80</u> Resp: J. L. Hawks C. B. Pettersson</p> <p>Status: Shannon and Wilson will prepare the basis for a letter report (status report) from the committee addressing a-i of this item. Additional studies or other information presented by B&R and WCC will also be considered, however, the final evaluation will be presented in a comprehensive report.</p>

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
	<p>h) Inspecting the onsite laboratory facilities and equipment used by existing testing agency and reviewing this laboratory test procedures.</p> <p>i) Reviewing the procedures, observing field operations and evaluating the results of the test fill program.</p> <p>Ref. Para: 2 - 5 (2), 2 - 6 (1)</p>				
A22	<p>Test fill program conducted in 1980 together with the results from 1976 program are documented in TRD 3A700 GP002-B.</p> <p>Ref. Para: 2 - 10 (2)</p>		Due Date <u>12/15/80</u>	<p>Resp: J. L. Hawks C. B. Pettersson</p>	<p>Status: Issued for review as PDCN/7-21-80. Will be included in Final Comprehensive Report.</p>
A23	<p>B&R has defined depths for in-place density testing as a means of assuring Systematic Field Quality Control.</p> <p>Ref. Para: 2 - 12 (1)</p>		Due Date <u>7/23/80</u>	<p>Resp: J. L. Hawks C. B. Pettersson</p>	<p>Status: Complete.</p>
A24	<p>An evaluation has been made by the B&R task force to reconfirm the compliance of the Category 1 structural backfill placed at site with design basis material characteristics described in FSAR 2.5.4.8.3.</p> <p>Ref. Para: 2 - 12 (6), 2 - 13 (1)</p>		Due Date <u>7/14/80</u>	<p>Resp: J. L. Hawks C. B. Pettersson</p>	<p>Status: Complete Ref: Response to Item 2b.</p>
A25	<p>Yet to be completed are the sequence of construction and remaining lift thickness.</p> <p>Ref. Para: 2 - 17 (2)</p>		Due Date <u>12/15/80</u>	<p>Resp: J. L. Hawks C. B. Pettersson</p>	<p>Status: Final issue TRD 3A700GP001. The data will be available as working documents and will be used for Items A27, A28, and A30.</p>
A26	<p>The task force has completed a tabulation of density test with depth in the backfill placements and field verification of lift thicknesses in accessible areas.</p> <p>Ref. Para: 2 - 17 (2)</p>		Due Date <u>12/15/80</u>	<p>Resp: J. L. Hawks C. B. Pettersson</p>	<p>Status: The tabulations were complete 7/17/80 (3A700GP001-A PDCN 7/17/80) to allow calculation of average R.D. and for committee review, the data will be updated and verified upon completion of all report reviews.</p>

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
A27	The results will be used for statistical analysis of the density distribution within the backfill, for evaluation of backfill placement and compaction operations, and for assessment of the engineering adequacy of the in place backfill. Ref. Para: 2 - 17 (2)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks C. B. Pettersson	Status: The numerical analyses will be complete 11/15/80, but the final statistical report will not be issued until the placement conditions, which influences the sampling validity can be fully reviewed.
A28	The data compiled during the evaluation will also be used as input to the studies of the adequacy of the existing backfill. Ref. Para: 2 - 17 (2), 2 - 18 (1)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks C. B. Pettersson	Status: The data will be provided to the committee upon completion of the numerical analyses, and as the final statistical report.
A29	The data compilation is described in B&R TRD 3A700GP001-B. Ref. Para: 2 - 18 (2)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks C. B. Pettersson	Status: See Item M9.
A30	Earthwork Inspection Reports will be carefully reviewed to determine whether or not the reported activities are in accordance with applicable specification and construction procedures. Ref. Para: 2 - 19 (1)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks C. B. Pettersson	
A31	The in place density test data and statistical results will also be evaluated in comparison to the results of the soil test boring program. Ref. Para: 2 - 19 (4)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks C. B. Pettersson	Status: The boring results will be compared to the in-place density test as a part of the representativeness studies and statistical analyses (M10 and M11).
A32	The independent review committee has reviewed all pertinent aspects of the structural backfill design studies, specification criteria, construction procedures and inspection and testing documentation. Ref. Para: 2 - 28 (2)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks C. B. Pettersson	Status: Presented in the Committee Interim Report and will be interated in the Status Report (A21) and further addressed if necessary in the Comprehensive Report.

SHOW CAUSE COMMITMENTS

ITEM NO	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
A33	Future inspection activities will be conducted under engineering direction to assure satisfactory inspections supported by comprehensive documentation. Ref. Para: 2 - 36 (1)		Due Date <u>6/20/80</u>	Resp: J. L. Hawks C. B. Pettersson	Status: Complete. Ref: TRD 3A700GP005
A34	Safety-related welds being examined by the Task Force includes all ASME Section III Pipe & Pipe Hanger Welds & Seismic Cat. I Structural Steel Welds made per AWS D1.1. Ref. Para: 3a - 3 (3)		Due Date <u>12/31/80</u>	Resp: J. L. Hawks I. J. Natarajan	Status: Defined in order.
A35	This program defined a series of activities starting with a complete review of all welding documentation, review of all welder & inspector qualification records; examination of the traceability of all base metal & weld filler material; and finally verification and reexamination of selected welds through a random sampling program. Ref. Para: 3a - 3 (3), 3a - 4 (1)		Due Date <u>12/21/80</u>	Resp: J. L. Hawks I. J. Natarajan	Status: Statement of what will be included in TRD.
A36	The Weld Review Program has been documented in TRD 5A700GP004. The TRD will be updated periodically to incorporate changes in the results of the program. Ref. Para: 3a - 5 (3)		Due Date <u>12/31/80</u>	Resp: J. L. Hawks I. J. Natarajan	Status: The Weld Review Program was deleted in B&R TRD 5A700GP004. The Task Force Interim Report dated July 28, 1980 presented results of the review through that date. The review will continue until all task have been completed. These tasks are listed as Commitments No. A-37 through A-86. The Due Dates shown are compatible with the schedules established to reexam, repair and restart safety related welding. All task will be complete and a final report issued by December 31, 1980.

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
A37	The qualifications of personnel who inspected ASME Piping & Cat. 1 Structural Weld are being reviewed to verify that they were properly qualified and certified in accordance with Code & Project Requirements. Ref. Para: 3a - 6 (1)		Due Date <u>10/18/80</u>	Resp: J. L. Hawks T. J. Natarjan	
A38	For ASME Piping, the existing radiographs and NDE Inspection results on weld data cards, weld data repair cards, and QC Inspection Reports are being reviewed for completeness and compliance to code and project requirements. Ref. Para: 3a - 6 (1)		Due Date <u>12/31/80</u>	Resp: J. L. Hawks T. J. Natarjan	
A39	A review of NDE Procedures has identified the need for improvements which have been and are being incorporated into the NDE Procedures. Ref. Para: 3a - 6 (2)		Due Date <u>9/30/80</u>	Resp: W. J. Friedrich Status: R/T and V/T complete. M/T and P/T in process.	
A40	Personnel qualifications will be reviewed by the Brown & Root Level III & Task Force Level III to determine the corrective action for the Task Force findings. Ref. Para: 3a - 7 (1)		Due Date <u>10/18/80</u>	Resp: W. J. Friedrich	
A41	Further review is required of previous QA procedures and training manuals containing requirements for personnel qualifications. Ref. Para: 3a - 7 (1)		Due Date <u>9/22/80</u>	Resp: W. J. Friedrich	
A42	In addition the Level III Program of Certifications and NDE Examinations is being reviewed. Ref. Para: 3a - 7 (1)		Due Date <u>9/22/80</u>	Resp: W. J. Friedrich	

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
A43	A reevaluation of all final accepted radiographs has been performed. Ref. Para: 3a - 7 (3)		Due Date <u>9/29/80</u>	Resp: W. J. Friedrich	Status: The reevaluation has been completed. The results will be issued in the final report from Southwest Research.
A44	All AWS Cat. 1 erection documentation has been reviewed and tabulated. Ref. Para 3a - 9 (2)		Due Date <u>N/A</u>	Resp: J. L. Hawks T. J. Natarjan	Status: All AWS accessible welds will be reexamined.
A45	For AWS Cat. 1 shop welding, all shop work request have been reviewed to identify those request which required welding. Ref. Para: 3a - 9 (2)		Due Date <u>8/18/80</u>	Resp: J. L. Hawks T. J. Natarjan	Status: Complete. Ref: DCN 8/15/80 to TRD 5A700GP004-B.
A46	Cat. 1 Structural Steel Material Certifications are being reviewed for compliance with code and project requirements. Ref. Para: 3a - 9 (2)		Due Date <u>12/31/80</u>	Resp: J. L. Hawks T. J. Natarjan	
A47	AWS Welding Procedures are also being reviewed for compliance with code and project requirements by comparison against primary documents (i.e. AWS Code, AISC Manual & Design Specifications) Ref. Para: 3a - 9 (2)		Due Date <u>12/31/80</u>	Resp: J. L. Hawks T. J. Natarjan	
A48	For ASME Piping Weld Documentation has been compiled (from isometric DWGS, TRD's, Weld Data Cards, etc.). Ref. Para: 3a - 11 (1)		Due Date <u>6/30/80</u>	Resp: J. L. Hawks T. J. Natarjan	Status: Complete.
A49	Evaluations are being made for each weld based on information obtained in other task (review of NDE procedures, inspector qualification reevaluation of existing R/T etc.). Ref. Para: 3a - 11 (1)		Due Date <u>12/31/80</u>	Resp: J. L. Hawks T. J. Natarjan	Status: Evaluation in process.

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
A50	ASME Piping Walkdown will be performed to physically verify information collected in the ASME Piping Weld Documentation Review. Ref. Para: 3a - 12 (1)		Due Date <u>12/31/80</u>	Resp: J. L. Hawks I. J. Natarjan	
A51	Fuel transfer tube and steam generator supports are being investigated to verify the basis on which changes were made in Code Classification Material Traceability and Inspection/Hydro Testing. Ref. Para: 3a - 12 (1)		Due Date <u>12/31/80</u>	Resp: J. L. Hawks I. J. Natarjan	
A52	Approximately 1300 ASME welds have been completed or are in process and applicable weld data has been collected. Ref. Para: 3a - 12 (2)		Due Date <u>N/A</u>	Resp: J. L. Hawks I. J. Natarjan	
A53	Technical Review of the data collected on pipe welds will continue to completion. Ref. Para: 3a - 12 (2)		Due Date <u>12/31/80</u>	Resp: J. L. Hawks I. J. Natarjan	Status: Evaluation in process.
A54	A review of pipe supports and hangers will commence as soon as the task on pipe welds is complete. Ref. Para: 3a - 12 (2)		Due Date <u>12/31/80</u>	Resp: J. L. Hawks I. J. Natarjan	Status: Start on 9-29-80.
A55	The investigation of the NRC concerns regarding the fuel transfer tube and steam generator supports is in progress. Ref. Para: 3a - 12 (2)		Due Date <u>12/31/80</u>	Resp: J. L. Hawks I. J. Natarjan	
A56	The review of welder qualifications is performed by reviewing welder qualification test records. Ref. Para: 3a - 13 (1)		Due Date <u>12/31/80</u>	Resp: J. L. Hawks I. J. Natarjan	Status: In process

SHOW CAUSE COMMITMENTS

ITEM NO	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
A57	Continuity of certification is being checked against employment records for welders. Ref. Para: 3a - 13 (1)		Due Date <u>12/31/80</u>	Resp: J. L. Hawks T. J. Natarjan	
A58	The associated Certified Material Test Reports will be reviewed for code compliance and the material type will be checked against that required by the welding procedure specification. Ref. Para: 3a - 13 (1)		Due Date <u>12/31/80</u>	Resp: J. L. Hawks T. J. Natarjan	
A59	The system for controlling distribution of the filler metal will be reviewed for code and specification compliance. Ref. Para: 3a - 13 (1)		Due Date <u>10/15/80</u>	Resp: J. L. Hawks T. J. Natarjan	Status: MOCUP-8 has been revised
A60	Two irregularities in procedures: 1) use of film side versus source side penetrameters on some of the welder coupons tested; 2) use of less stringent ASME acceptance criteria instead of the AWS acceptance criteria for the AWS test coupons. These concerns will be evaluated to determine the acceptable of the affected qualifications. Ref. Para: 3a - 13 (2), 3a - 14 (1)		Due Date <u>10/18/80</u>	Resp: J. L. Hawks T. J. Natarjan	
A61	Welding filler materials used for safety-related welding, CMTR's will be evaluated for compliance to code and project requirements. Ref. Para: 3a - 14 (2)		Due Date <u>12/31/80</u>	Resp: J. L. Hawks T. J. Natarjan	
A62	Welder qualification records will be completed when all weld data cards have been reviewed. Ref. Para: 3a - 14 (1)		Due Date <u>12/31/80</u>	Resp: J. L. Hawks T. J. Natarjan	

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
A63	A review of the "unresolved items" identified in the NRC Investigation Report is being performed to evaluate and resolve the reported concerns. Ref. Para: 3a - 14 (3)		Due Date <u>12/31/80</u>	Resp: J. L. Hawks I. J. Natarjan	
A64	Past NRC, HL&P, B&R Audit Reports have been reviewed to determine the extent to which audit deficiencies have been properly dispositioned. Ref. Para: 3a - 14 (4)		Due Date <u>12/31/80</u>	Resp: J. L. Hawks I. J. Natarjan	Status: Initial review completed. Results indicated a need for further review which is in process.
A65	Field Generated Reports (NCR's, FREA's and CAR's) have been reviewed to verify that each has been properly dispositioned. Ref. Para: 3a - 15 (1)		Due Date <u>12/31/80</u>	Resp: J. L. Hawks I. J. Natarjan	Status: Initial review completed. Results indicated a need for further review which is in process.
A66	The PSAR/FSAR and Engineering Specifications have been reviewed to identify the applicable edition and addenda for all specified codes and standards. Ref. Para: 3a - 15 (1)		Due Date <u>7/18/80</u>	Resp: J. L. Hawks I. J. Natarjan	Status: Complete. DCN to TRD 5A700GP004 includes results.
A67	The Construction and QC Procedures (current and past revisions) covering safety-related piping and Cat. 1 Structural Steel are being reviewed for consistency and compliance to project requirements. Ref. Para: 3a - 15 (1)		Due Date <u>12/31/80</u>	Resp: J. L. Hawks I. J. Natarjan	
A68	Past audits and field generated documents such as NCR's FREA's, and CAR's related to welding are being reviewed. Ref. Para: 3a - 15 (2)		Due Date <u>12/31/80</u>	Resp: J. L. Hawks I. J. Natarjan	Status: Review continuing
A69	An initial review of field generated documents has been completed, but an evaluation of the information gathered is required. Ref. Para: 3a - 15 (2)		Due Date <u>12/31/80</u>	Resp: J. L. Hawks I. J. Natarjan	

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
A70	The Engineering Specifications and Construction Procedures have been reviewed for consistency and compliance with PSAR/FSAR. Ref. Para: 3a - 16 (1)		Due Date <u>12/31/80</u>	Resp: J. L. Hawks T. J. Natarjan	Status: Initial review completed. Results indicated a need for further review which is continuing.
A71	All Cat. 1 Structural Steel Accessible Welds will be visually re-examined by inspectors who have been retrained to the AWS Code D1.1-75 with special emphasis on the detailed requirements of the code. Ref. Para: 3a - 17 (1)		Due Date <u>N/A</u>	Resp: W. J. Friedrich	Status: Will start on 9/22 per approved plan.
A72	AWS training will also include a detailed review of the welding and NDE Procedures which include code and design specification requirements. Ref. Para: 3a - 17 (1)		Due Date <u>9/22/80</u>	Resp: W. J. Friedrich	Status: Complete - Training to continue for QC Inspectors until adequate staffing is available.
A73	The results of the examination will be evaluated and accessible welds will be repaired as required. Ref. Para: 3a - 17 (1)		Due Date <u>N/A</u>	Resp: J. L. Hawks T. J. Natarjan	Status: Depends on completion of Item A71.
A74	The weld characteristics and other pertinent information will be statistically classified for use in an engineering analysis of inaccessible welds to determine their acceptability. Ref. Para: 3a - 17 (1)		Due Date <u>N/A</u>	Resp: J. L. Hawks T. J. Natarjan	Status: Same as A71 and A73 above.
A75	ASME ECW Pipe Welds, the B&R and Task Force Level III will review the R/T film found to have unacceptable indications in order to determine the welds requiring repair. Ref. Para: 3a - 18 (1)		Due Date <u>9/27/80</u>	Resp: J. L. Hawks T. J. Natarjan	

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
A76	In cases where ECW Pipe with unacceptable indications is buried in or under concrete, an engineering evaluation will be conducted to determine the necessity of repair. Ref. Para: 3a - 18 (1)		Due Date <u>N/A</u>	Resp: J. L. Hawks T. J. Natarjan	Status: Schedule and type of evaluation will be provided by 10/30/80.
A77	Before commencing needed repair, on ECW Welds, the entire weld will be examined by PT & RT methods regardless of whether SPOT or FULL RT was originally employed. Ref. Para: 3a - 18 (1)		Due Date <u>N/A</u>	Resp: J. L. Hawks T. J. Natarjan	Status: Start on 9/22/80 per plan
A78	Repaired segments of ECW Welds will be reexamined by RT and PT for final acceptance. Ref. Para: 3a - 18 (1)		Due Date: <u>N/A</u>	Resp: J. L. Hawks T. J. Natarjan	Status: Start as 9/22/80 per plan
A79	ECW results will be evaluated with regard to inspector and welder performance to determine if additional welds need inspection. Ref. Para: 3a - 18 (1)		Due Date <u>N/A</u>	Resp: J. L. Hawks T. J. Natarjan	Status: Start on 9/22/80.
A80	ASME Pipe Welds (other than ECW) the B&R Level III will review the qualifications of PT Inspectors to determine whether additional welds require reexamination. Ref. Para: 3a - 18 (2)		Due Date <u>10/18/80</u>	Resp: J. L. Hawks T. J. Natarjan	
A81	B&R Level III will evaluate the remaining RT to establish the need for ASME weld repair. Ref. Para: 3a - 18 (2)		Due Date <u>9/27/80</u>	Resp: J. L. Hawks T. J. Natarjan	
A82	All accessible ASME Socket Welds and a large sample of butt welds will be reexamined. Ref. Para: 3a - 19 (1)		Due Date <u>N/A</u>	Resp: J. L. Hawks T. J. Natarjan	Status: Pending - Should be able to provide date by 9/27/80.

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
A83	All rejectable indications will be repaired unless the welds are embedded in concrete. Welds buried in concrete an engineering evaluation will be performed to determine the necessity of repair. Ref. Para: 3a - 19 (1)		Due Date <u>N/A</u>	Resp: J. L. Hawks T. J. Natarjan	Status: Schedule and type of evaluation will be provided by 10/30/80.
A84	ASME NF and Hanger Weld Documentation will be reviewed and evaluated. Ref. Para: 3a - 19 (2)		Due Date <u>N/A</u>	Resp: J. L. Hawks T. J. Natarjan	Status: Start on 9/29/80.
A85	A sample of the support and hanger welds will be reexamined to determine overall condition of the welds. Ref. Para: 3a - 19 (2)		Due Date <u>N/A</u>	Resp: J. L. Hawks T. J. Natarjan	Status: Start on 9/29/80
A86	NF Support and Hanger Welds performed by unqualified personnel will be repeated. Ref. Para: 3a - 19 (2)		Due Date <u>N/A</u>	Resp: J. L. Hawks T. J. Natarjan	Status: Start on 9/29/80
A87	A gradual restart on a controlled basis in accordance with a step by step program of planned activities has been prepared. Ref. Para: 3a - 19 (3)		Due Date <u>9/12/80</u>	Resp: J. L. Hawks Don Muscente	To be reviewed with NRC on 9/12/80.
A88	With respect to RCB's which are the first category of structures under review, the Task Force and Consultants Panel are examining internal placements. Ref. Para: 3b - 3 (3)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: RCB #1 Complete for visual inspection and test. Results are documented in SI-HL-AE-513. Will be included in Final Report.
A89	The Task Force and Consultants Panel are reviewing the results of previous HL&P/B&R investigations of the RCB shells. Ref. Para: 3b - 3 (3)		Due Date <u>N/A</u>	Resp: J. L. Hawks G. R. Murphy	Status: Complete. Ref: SI-HL-AE-513

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
A90	A list of unresolved concerns previously identified in NRC HL&P & B&R Audits have been compiled. Ref. Para: 3b - 3 (4), 3b - 4 (1)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Initial list has been completed, however the list is to be continually updated if additional concerns are identified. The complete list is to be included in the final report on 12/15/80.
A91	Unresolved concerns will be addressed either in the normal course of the review or through special investigation. Ref. Para: 3b - 4 (1)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Complete for RCB's. Results documented in SI-EL-AE-513. Will be included in Final Report.
A92	IRD 2A700GP003 "review of safety-related concrete structures including embedments" will be updated periodically to incorporate changes in and results of the program. Ref. Para: 3b - 4 (2)		Due Date <u>N/A</u>	Resp: J. L. Hawks G. R. Murphy	Status: On-going - Final revision scheduled for release by 12/15/81.
A93	UI testing of concrete has found one (1) discrepancy (appears to be due to surface condition) which is being further investigated and is expected to be resolved shortly. Ref. Para: 3b - 4 (3)		Due Date <u>8/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Complete. Ref: SI-EL-AE-513.
A94	To assure all documentation has been performed, <u>all</u> test reports, batch plant records, pour cards, inspection reports, drawings, DCN's, FREA's, NCR's, and CAR's which pertain to selected placements are being reviewed and evaluated as to their correctness and completeness. Ref. Para: 3b - 7 (2)		Due Date <u>10/31/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Complete for RCB's. Results to be included in Final Report.
A95	Test reports are being evaluated for the cement admixture, aggregates and water used, as well as slump, air content, compressive strength, unit weight and concrete temperature. Ref. Para: 3b - 7 (2)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Complete for RCB's. Results to be included in Final Report.

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
A96	Each report is being checked for completeness, design compliance, and for proper signature of initials. Ref. Para: 3b - 7 (2)		Due Date <u>10/31/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Complete for RCB's. Results will be included in Final Report.
A97	Batch plant records are being evaluated for completeness of record, proper signatures or initials, and compliance with applicable procedures. Ref. Para: 3b - 7 (2)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Complete for RCB's. Results will be included in Final Report.
A98	Pour cards are being checked for QC signatures, listing of NCR's, FREA's, DCN's, and drawings, and notations of other unsatisfactory conditions which should have resulted in the issuance of an NCR. Ref. Para: 3b - 7 (2)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Complete the RCB's. Results will be included in Final Report.
A99	Preplacement, placement, and curing inspection checklist are being reviewed for proper signatures, time span between preplacement inspection and of pour, and notations of other unsatisfactory condition which should have resulted in issuance of NCR. Ref. Para: 3b - 7 (2), 3b - 8 (1)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Complete for RCB's. Results will be included in Final Report.
A100	Where available, punchlist are also being evaluated for proper signoff of each item. Ref. Para: 3b - 8 (1)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Complete for RCB's. Results will be included in Final Report.
A101	As designed documents (including NCR's, FREA's, drawings, and DCN's) are being evaluated to determine where <u>every</u> embedment, penetration, anchor bolt, construction joint, opening and dimension change should be located. Ref. Para: 3b - 8 (2)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Complete for RCB's. Results will be included in Final Report.

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
A102	The "as-built" inspection program consist of obtaining field measurements for: placement location and dimensions (thickness, openings, plumbness, squareness, size, and identification if available). Ref. Para: 3b - 9 (2)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Complete for RCB's. Results will be included in Final Report.
A103	Once the "as-built" condition is documented, it will be compared to the "as designed" condition and all discrepancies will be identified. Ref. Para: 3b - 9 (2)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: RCB #1 comparison complete. Results to be included in Final Report.
A104	Visual inspection is being performed by the Special Consultants Panel and selected examiners from the Task Force and addresses the following areas: <ol style="list-style-type: none"> 1) General appearance of the surface 2) Nature and extent of cracking 3) Evidence of volume change 4) Evidence of cement/aggregate reactions 5) Secondary deposit on surface 6) Secondary deposits in cracks or voids 7) Construction joint alignment 8) Construction joint cleanliness 9) Control joints 10) The nature and extent of deflections 11) The nature and extent of dislocations resulting in joint movement 12) Tilting 13) Shearing or misalignment of structural elements 14) Apparent effectiveness of curing 15) The extent and significance of surface characteristics 16) Indication of inadequate consolidation 17) Indications of adequate consolidation behind embedment 18) The adequacy of repairs based on soundness and appearance 19) Satisfactory embedment of penetration 		Due Date <u>12/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Visual inspection has been completed for Unit 1 RCB and initiated for Unit 2 RCB. Results will be included in Final Report.

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
	20) Dislocation or misalignment of embedded plates 21) Satisfactory embedment of plates 22) Apparent consolidation surrounding anchor bolts 23) General appearance of seismic joints 24) Evidence of grout leakage, and 25) Adequacy of existing repairs Ref. Para: 3b - 9 (3), 3b - 10 (1)				
A105	Based on visual inspection results, the Consultants Panel is to indicate potential areas on the selected placement in which destructive tests should be performed to verify the sonic test results. Ref. Para: 3b - 11 (1)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Complete for RCB #1 and initiated for RCB #2. Results will be included in Final Report.
A106	The cognizant design engineer is to review and approve the location of core holes with regard to potential of cutting reinforcing steel and subsequent consequences thereof. Ref. Para: 3b - 11 (1)		Due Date <u>N/A</u>	Resp: J. L. Hawks G. R. Murphy	Status: Reinforcing steel cut to date has been approved by design engineering. Included in TRD 2A700GP003.
A107	The Consultants Panel is to also visually examine every core obtained to evaluate the quality of consolidation and uniformity of the concrete. Ref. Para: 3b - 11 (1)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Cores obtained in RCB #1 have been evaluated by consultants panel. See interim report to NRC 8/15/80 SF-EL-AE-513. Results will be included in Final Report.
A108	The Consultants Panel is to direct the drilling of probe holes and using fiberoptics visually examine the holes to evaluate the quality of consolidation. Ref. Para: 3b - 11 (1)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Complete in RCB #1 and initiated for RCB #2. Results will be included in Final Report.
A109	Selected cores, in addition to visual examination, are to be examined using petrographics and microscopical techniques. Ref. Para: 3b - 11 (1)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Complete in RCB #1 and initiated in RCB #2. Results to be included in Final Report.

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
All 10	The Consultants Panel is to address previous unresolved concerns and allegations by visually inspecting such areas and recommending specific test where such methods would resolve specific concerns or allegations. Ref. Para: 3b - 11 (1)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: RCB #1 and #2 Placements CI-1-W90, CI-1-W83 and CI-1-W81B have been examined by the consultant panel. (RE ST-HL-AE-513). Results to be included in Final Report.
All 11	The sonic correlations and reference standard are being developed on the sample area utilizing cores or bore holes where possible. Ref. Para: 3b - 12 (1)		Due Date <u>12/15/80</u>	Resp: J. L. Hawks G. R. Murphy	Status: Sonic Correlation Data taken and correlation in process. Results to be included in Final Report.
All 12	To provide assurance that on-going safety related concrete work is meeting all requirements, HL&P/B&R have completed a review of all concreted inspection procedures and applicable training procedures independent of special task force. Ref. Para: 3b - 15 (1)		Due Date <u>N/A</u>	Resp: J. L. Hawks G. R. Murphy	Status: Complete New Procedures issued
All 13	Q.C. inspectors have been added to assure that proper preplacement inspections are being conducted. Ref. Para: 3b - 15 (3)		Due Date <u>N/A</u>	Resp: W. J. Friedrich	Status: Complete.
All 14	Revised procedures are now in place and retraining is being performed where necessary. Ref. Para: 3b - 15 (2)		Due Date <u>7/21/80</u>	Resp: K. Cook	Status: Procedures implemented and training accomplished 7/21/80.
All 15	Consolidation refresher training is now required every 90 days for consolidation placement craft personnel. Ref. Para: 3b - 16 (1)		Due Date <u>N/A</u>	Resp: R. H. Leasburg	Status: Complete.
All 16	Stop work authority of Q.C. inspectors is being emphasized in training of project personnel Ref. Para: 5 - 5 (3)		Due Date <u>8/25/80</u>	Resp: W. J. Friedrich	Status: Complete; ST-QAP-15.2 issued 8/15/80.

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
A117	Quality Engineering (QE) will participate in construction planning and will determine inspection hold points for work activities. Ref. Para: 6 - 2 (3)		Due Date <u>N/A</u>	Resp: W. J. Friedrich	Status: Inspection points delineated in CCP-25.
A118	Q.E. will determine inspection characteristics required and record them on Inspection Reports, (IR) to be used by QC Inspectors. Ref. Para: 6 - 2 (3)		Due Date <u>N/A</u>	Resp: W. J. Friedrich	Status: See A117 above.
A119	QC inspectors will record results of all planned inspections on I.R. The I.R. will be a permanent QA record. Ref. Para: 6 - 3 (2)		Due Date <u>N/A</u>	Resp: W. J. Friedrich	Status: See A117 above.
A120	NCR's will be acknowledged by the signature of the construction foreman or general foreman. Ref. Para: 6 - 4 (2), 6 - 5 (1)		Due Date <u>9/15/80</u>	Resp: W. J. Friedrich	
A121	Formal procedures (trending) will require the collection of data from all QA records recording nonconforming conditions. Ref. Para: 6 - 9 (2)		Due Date <u>9/15/80</u>	Resp: W. J. Friedrich	
A122	A new uniform coding system is being developed under which all those charged with collecting data for trending will be trained in the use of the system to assure uniform application. Ref. Para: 6 - 9 (3)		Due Date <u>9/15/80</u>	Resp: W. J. Friedrich	
A123	At a minimum, standard codes will be developed for the following categories: building or area; activity; failure type; and time interval. Ref. Para: 6 - 9 (3), 6 - 10 (1)		Due Date <u>9/15/80</u>	Resp: W. J. Friedrich	

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
A124	Procedures will define the list of documents that will be trended. Ref. Para: 6 - 10 (2)		Due Date <u>9/15/80</u>	Resp: W. J. Friedrich	
A125	Responsibility will be assigned to specific B&R organization for review of each tape of document, collection of data, and submission to Discrepancy Analysis Group (DAG). Ref. Para: 6 - 10 (2)		Due Date <u>9/15/80</u>	Resp: W. J. Friedrich	
A126	DAG will report the results of its analysis to Q.E. Ref. Para: 6 - 10 (2)		Due Date <u>9/15/80</u>	Resp: W. J. Friedrich	
A127	QE will review suspect areas to determine if the incidents make up a common cause. If common cause is identified QE will issue a CAR. Ref. Para: 6 - 10 (2)		Due Date <u>9/15/80</u>	Resp: W. J. Friedrich	Status: Upon completion of DAG Procedures.
A128	Trend analysis performed by DAG will be made available to HL&P QA. Ref. Para: 6 - 10 (3)		Due Date <u>9/15/80</u>	Resp: W. J. Friedrich	
A129	HL&P QA will utilize the B&R data and other data collected by HL&P surveillance and audits to perform an independent trend review and report results to upper management. Ref. Data: 6 - 10 (3)		Due Date <u>11/1/80</u>	Resp: R. A. Frazar	
A130	All design changes proposed at the STP Site will be submitted to Project Site Engineering. Ref. Para: 7 - 2 (2)		Due Date <u>10/1/80</u>	Resp: R. W. Peverley	
A131	Qualification and training records will be maintained on Project Site Engineers and Q.E.'s Ref. Para: 7 - 2 (2)		Due Date <u>10/31/80</u>	Resp: R. W. Peverley	

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
Al32	Copies of DCN's will be issued to Board Members prior to each meeting. Ref. Para: 7 - 5 (1)		Due Date <u>10/1/80</u>	Resp: R. W. Peverley	
Al33	Board Chairman will sign DCN signifying approval. Ref. Para: 7 - 5 (1)		Due Date <u>10/1/80</u>	Resp: J. L. Hawks	
Al34	The currently use FREA will be eliminated. Ref. Para: 7 - 5 (2)		Due Date <u>10/1/80</u>	Resp: R. W. Peverley	
Al35	Each day a description of each DCN processed that day will be entered into a computer by engineering personnel at the Site and in the Houston office. Ref. Para: 7 - 7 (2)		Due Date <u>10/1/80</u>	Resp: R. W. Peverley	
Al36	Each morning, a computer printout will be provided to users of the design documents. Ref. Para: 7 - 7 (2)		Due Date <u>10/1/80</u>	Resp: R. W. Peverley	
Al37	When construction of an item has been completed verification checklist will be prepared and their correctness will be verified by Design and Quality Engineer. This checklist will be used by the inspector for final acceptance. Ref. Para: 7 - 7 (3), 7 - 8 (1)		Due Date <u>10/1/80</u>	Resp: R. W. Peverley	
Al38	During first few weeks of new program no FREA's will be issued. Ref. Para: 7 - 8 (5)		Due Date <u>10/1/80</u>	Resp: R. W. Peverley	
Al39	Evaluation of a program to be performed to determine if minor changes are required. Ref. Para: 7 - 8 (6), 7 - 9 (1)		Due Date <u>10/31/80</u>	Resp: R. W. Peverley	

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
A140	Any FREA not approved by October 1, 1980 will be handled as FCR and processed accordingly. Ref. Para: 7 - 9 (1)		Due Date <u>10/1/80</u>	Resp: R. W. Peverley	
A141	A system will be created by Quality Engineers such that, prior to commencement of work, the records required to substantiate the individual activities will be identified. Ref. Para: 8 - 2 (6)		Due Date <u>11/1/80</u>	Resp: W. J. Friedrich	
A142	Persons charged with creating required documents will record the status of those documents as the documents are created. Ref. Para: 8 - 2 (6), 8 - 3 (1)		Due Date <u>11/1/80</u>	Resp: W. J. Friedrich	
A143	When completed document packages on individual activities are completed in the QA Vault, Quality Engineering will review them to verify the documents are complete and adequate. Ref. Para: 8 - 3 (1)		Due Date <u>11/1/80</u>	Resp: W. J. Friedrich	
A144	New microfilm equipment is being acquired to speed up filming. Ref. Para: 8 - 3 (2)		Due Date <u>10/1/80</u>	Resp: W. J. Friedrich	
A145	A on-site film processing laboratory devoted to QA needs is being established. Ref. Para: 8 - 3 (2)		Due Date <u>10/1/80</u>	Resp: W. J. Friedrich	
A146	A new filing system is being implemented to eliminate the various suspense files. Ref. Para: 8 - 3 (4)		Due Date <u>10/1/80</u>	Resp: W. J. Friedrich	

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
A147	There will be a single filing system and the documents will be filed with a record traveler prepared by Quality Engineers. Ref. Para: 8 - 4 (1)		Due Date <u>11/1/80</u>	Resp: W. J. Friedrich	
A148	The record traveler will identify the records required to substantiate each activity, will record the status of the file, records borrowed from the file and will be used to identify overdue and missing records. Ref. Para: 8 - 4 (2)		Due Date <u>11/1/80</u>	Resp: W. J. Friedrich	
A149	Records already in the vault will be reviewed for adequacy and completeness, based on the results of the review of records requirements. Ref. Para: 8 - 4 (2)		Due Date <u>8/81</u>	Resp: W. J. Friedrich	
A150	The B&R Audit Group and Project QA Management will regularly receive the reports of the trend Analysis Group. Ref. Para: 9 - 2 (4)		Due Date <u>N/A</u>	Resp: R. L. Ulrey R. W. Bass	Status: <u>HL&P</u> HL&P is reviewing the HL&P trend on a monthly basis. Status: <u>B&R</u> Quarterly.
A151	The HL&P Audit Group and Project Management QA will review both HL&P and B&R trend analyses. Ref. Para: 9 - 3 (1)		Due Date <u>N/A</u>	Resp: R. L. Ulrey	Status: The first trend analyses issued by HL&P was sent to management as part of the August 1980 monthly report. Additional reports will be sent on a quarterly basis.
A152	The function of the HL&P Corporate Audit Group has been redefined to minimize conflicting assignments and responsibilities of auditors. Thereby creating a group who's primary function is to prepare for and conduct audits of safety-related activities. Ref. Para: 9 - 3 (3)		Due Date <u>N/A</u>	Resp: R. L. Ulrey	Status: HL&P Procedures QAP-5, 5A, 5B, and 5C have been revised and are now in effect. The HL&P organization change which assigns a supervisor to the audits group reporting to the HL&P QA manager went into effect June 16, 1980.

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
A153	Auditors are continually receiving additional training in the areas of codes, standards, procedures and other documents related to QA programs and auditing. Ref. Para: 9 - 3 (3)		Due Date <u>N/A</u>	Resp: R. L. Ulrey R. W. Bass	Status: <u>HL&P</u> HL&P QA has held training classes over the past two months to assure auditors receive training in Auditing Procedure revisions, QA Document Review functions and stop work authority. Additional training sessions will be conducted as procedures are issued/revised. In addition several personnel have attended AWS trending and received AWS Inspector certification. Status: <u>B&R</u> Started and on-going.
A154	HL&P has developed an annual audit plan, which will be reviewed every 6 months and revised accordingly. Ref. Para: 9 - 4 (3)		Due Date <u>N/A</u>	Resp: R. L. Ulrey	Status: <u>The annual audit plan is on file at HL&P EDC office, the plan is dated 6/4/80.</u>
A155	In addition to the annual schedule a more detailed audit schedule is issued quarterly. Ref. Para: 9 - 4 (3)		Due Date <u>N/A</u>	Resp: R. L. Ulrey R. W. Bass	Status: <u>HL&P</u> The quarterly audit schedule has been issued to include the months from June-Dec. 1980. This schedule has been revised several times to assure it is kept current. The last revision was Rev. 4. Status: <u>B&R</u> Started and on-going.
A156	The quarterly schedule provides for supplemental audits. Ref. Para: 9 - 4 (3)		Due Date <u>N/A</u>	Resp: R. L. Ulrey R. W. Bass	Status: <u>HL&P</u> Rev. 4 of audit schedule reflects supplemental audits. Status: <u>B&R</u> 9-15-80.

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE	RESPONSIBILITY	STATUS
A157	A matrix has been prepared delineating all B&R procedures applicable to SIP and the corresponding audit to which they apply. Ref. Para: 9 - 4 (3)		Due Date <u>N/A</u>	Resp: R. L. Ulrey R. W. Bass	Status: <u>EL&P</u> Matrix is on file at QA EDC office and will be updated as B&R procedures are added/deleted. Status: <u>B&R</u> Complete.
A158	This matrix is utilized by EL&P and B&R audit groups to assure all Quality activities are audited within the required frequency. Ref. Para: 9 - 4 (3)		Due Date <u>N/A</u>	Resp: R. L. Ulrey R. W. Bass	Status: <u>EL&P</u> Matrix was used during EL&P Audit BR-30 and will be used for EL&P Audit BR-34. Status: <u>B&R</u> On-going.
A159	At least one audit team member must be experienced or trained in the discipline being audited. Ref. Para: 9 - 4 (4)		Due Date <u>N/A</u>	Resp: R. L. Ulrey R. W. Bass	Status: <u>EL&P</u> During BR-30, a technical advisor was used as a team member. Audits SWF-6, SRI-1, HL-84, WNSD-1, E7C, audit team members were experienced in the discipline audited. Status: <u>B&R</u> Incorporated into audit procedure.
A160	A revised audit schedule and an update of audits conducted in the previous quarter, including an evaluation of the audits performed are issued each quarter. Ref. Para: 9 - 5 (1)		Due Date <u>N/A</u>	Resp: R. L. Ulrey R. W. Bass	Status: <u>EL&P</u> On July 31, 1980, status was issued to the Houston QA Manager. Status: <u>B&R</u> On-going since January 1980.
A161	Follow-up audits will be conducted to verify successful correction of problems and their causes. Ref. Para: 9 - 5 (3)		Due Date <u>N/A</u>	Resp: R. L. Ulrey R. W. Bass	Status: <u>EL&P</u> Follow-up audits are and will continue to be conducted. Ref. WPD-5, GE-16, PWRSD-5, HL-87, BR-31, HL-84, BR-35, HL-90, HL-91, HL-86, HL-92, HL-95, BR-37. Status: <u>B&R</u> On-going.

SHOW CAUSE COMMITMENTS

ITEM NO.	COMMITMENT	REF. PARA.	DUE DATE RESPONSIBILITY STATUS
A162	<p>The HL&P Corporate Audit Group has been conducting audits of B&R construction activities since March, 1980.</p> <p>Ref. Para: 9 - 5 (4)</p>		<p>Due Date <u>N/A</u> Resp: R. L. Ulrey</p> <p>Status: <u>HL&P</u></p> <p>Audits BR-30 and BR-34 are B&R construction audits completed or in process. Additional audits are scheduled and due to the stop work in the welding area BR-33 will be conducted at a later date.</p>
A163	<p>The matrix of B&R SIP Procedures has been prepared and both HL&P and B&R have new schedules of future audits, including time and personnel provisions for the performance of supplemental audits.</p> <p>Ref. Para: 9 - 6 (1)</p>		<p>Due Date <u>N/A</u> Resp: R. L. Ulrey R. W. Bass</p> <p>Status: <u>HL&P</u></p> <p>The supplemental audits are listed on the schedule within the time frame by month, specific dates or activities are not listed until the supplemental audit is requested in accordance with HL&P procedure.</p> <p>Status: <u>B&R</u></p> <p>Complete <u>9/15/80</u>.</p>