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A Halliburton Company

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March 18, 1981

Mr. Karl V. Seyfrit, Director
Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive - Suite 1000
Arlington, Texas 76011

Dear Mr. Seyfrit:

Reference: Docket 99900502/81-01


This will confirm the telephone conversation of March 17, between Messrs. Dan Fox and R. J. Vurpillat, and the conversation between Messrs. Fox and R. W. Peverley of March 18.

Attached we are providing additional information and clarification regarding our February 16, 1981 response to Deviation "C", identified in your report of the January 5-8, 1981 inspection by your Vendor Inspection Branch.

We trust that this information is satisfactory; however, if you desire additional information, please do not hesitate to contact us.

Very truly yours,

BROWN & ROOT, INC.


William M. Rice
Group Vice President

RJV:bb

Attachment

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ADDITIONAL RESPONSES

NRC LETTER JANUARY 29, 1981
DOCKET NO. 99900502/81-01

DEVIATION C

Section 6.3.1 of the South Texas Project Quality Assurance Manual states in part that "To ensure that the responsible engineering personnel are working to the latest revision or issue of an Engineering document, a comprehensive document status list shall be published at least every two months by the EDCC (Engineering Document Control Center)."

Contrary to the above, a comprehensive document status list has not been published, nor updated, bi-monthly by the EDCC since October 2, 1980.

SPECIFIC FINDING

- (a) Section 6.0 of the STP Quality Assurance Manual states that a comprehensive document status list shall be published at least every two months by the EDCC (Engineering Document Control Center) to ensure that the responsible engineering personnel are working to the latest revision or issue of an Engineering document.
- (b) Contrary to this procedure, the responsibility for issuing an engineering document status list has been assigned to a different activity, the Computer Support Group, that does not provide the same controls for the accuracy of their data base as does the EDCC.

ORIGINAL RESPONSE

Corrective Action

Since the January 5-8, 1981, inspection, the issuance of the document status list has been placed under the purview of the Manager of Engineering Document Control within the Engineering group.

Engineering will continue to be responsible for issuing this document at least every two months.

Preventive Measures

In order to assure that this problem does not reoccur, Brown & Root will revise the STP QA Manual to state that "Engineering" will be responsible for issuance of the document status list.

A draft of the revised STP QA Manual has been issued for internal review and comment. This proposed revision contains the change noted above. We will issue the revision prior to March 31, 1981.

ADDITIONAL INFORMATION

Corrective Action

Engineering design document status listing is performed in accordance with provisions of Procedure DC28 (for Brown & Root documents) and DC4 (for foreign documents).

Description of the details of the provisions currently in effect are as follows:

There are currently two systems being used to identify and track Engineering documents: 1) the Design Change Tracking System for Brown & Root documents and 2) the Document Control Center computer system for vendor documents.

Prior to October, 1980, all documents were traced through the DCC computer system. Copies of the printout from this system were distributed to internal interfacing organizations and within Brown & Root Engineering, at least bi-monthly. During the activities associated with Show Cause Item 7, it became apparent that we would need to provide Site personnel with a current status of the design. Inherent limitations in the EDCC system precluded its use for that purpose. A new program, the Design Change Tracking System, was therefore conceived to provide current status of all Brown & Root design documents. The existing DCC computer system is being maintained to provide status of all vendor documents.

At the time of implementation of the design change tracking system, it was determined that this new program would be set up and implemented outside of the EDCC in order that their day-to-day operation would not be impacted. When this system was debugged and became fully operational, the responsibility was transferred to the Supervisor of Engineering Document Control. A group was formed whose title is Document Control Computer Interface (DCCI). This group reports to the Supervisor of Engineering Document Control on the same level as the Engineering Document Control Center. Reports are usually issued daily to the appropriate Site and Engineering personnel. These reports show Brown & Root design changes which were made the previous day. Once each month, a total listing is usually issued to affected organizations. The issuance of these documents is, of course, affected by equipment availability/malfunctions, or by the need to update program inputs. The issuance of the daily reports and the monthly printouts is through Engineering Document Control.

In addition, pending equipment availability/malfunction, the DCCI issues the printout of vendor documents once each month. Vendor drawings are issued one month and procedures the next month. Thus, an update of all vendor documents is on a bi-monthly basis. A need for more frequent updating has not been established at this time.

In summary, Engineering Document Control governs the input to the Design Change Tracking System for Brown & Root documents and the DCC Computer System for vendor documents, verifies data against actual document issues and issues printouts of document status.

CLARIFICATION

Preventive Measures

The entire STP Quality Assurance Manual is currently being revised in preparation for an ASME resurvey which is now scheduled for August 1981. That revision will identify that Engineering Document Control (group) is responsible for issuing the status listings.

A draft of the revised STP QA Manual has been issued for internal review and comment. The revision discussed above will also be made to the Document Control section of the current manual and will be issued prior to March 31, 1981.