

Gibbs & Hill, Inc.

ENGINEERS DESIGNERS CONSTRUCTORS

DIRECT DIAL EXTENSION

(212) 760-5026

March 13, 1981

Mr. Uldis Potapovs, Chief
Vendor Inspection Branch
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas

Dear Mr. Potapovs:

Subject: Response to Inspection Report 81-01
Docket No. 99900524/81-01

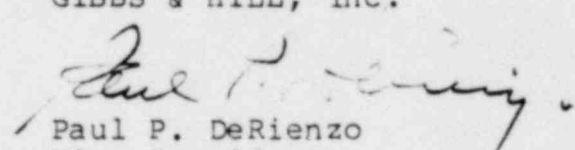
Enclosed is Gibbs & Hill's response as requested in your letter dated February 20, 1981 pursuant to the inspection of our QA Program conducted by Messrs. D. F. Fox and D. G. Breaux of your office on January 26-30, 1981.

We have repeated each nonconformance in the same order given in the Notice of Nonconformance of your inspection report and followed each with a response.

If we may be of any further assistance, please contact me or Mr. Nabil N. Keddis, Quality Assurance Manager.

Very truly yours,

GIBBS & HILL, Inc.


Paul P. DeRienzo
Vice President
Quality Assurance

PPD:lr
Enclosure

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Notice of Nonconformance:

Criterion V of Appendix B to 10 CFR Part 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." Nonconformances with these requirements are as follows:

- A. Gibbs & Hill Design Control Procedure DC-3 states in part that, "The title block follows the sample block shown in the above noted Appendix (DC-3-I)..." which shows that the sheet number of the drawing is indicated by a numerical designator suffixed to the drawing's numerical sequence number.

Contrary to the above, the sheet number of forty-two (42) of fifty-five (55) safety related drawings examined by the inspector was not indicated by a numerical designator suffixed to the drawing's numerical sequence number.

1. Description of steps that have been taken or will be taken by Gibbs & Hill, Inc. to correct this item:

Practice and procedure have been brought into compliance. Design Control Procedure DC-3, "Drawing Production Procedure," has been revised to permit either of the following acceptable options for numbering drawings:

- a. Sheet number designation is identified by a numerical suffix to the sequential drawing number (present procedure).
 - b. Sheet number designation is identified by a separate note in addition to sequential drawing number (present practice).
2. Description of steps that have been taken or will be taken to prevent recurrence:

A memorandum dated 3/5/81 was issued by the Project Manager to job engineers alerting them to the procedure revision and instructing them in the use of the alternate methods for designating the sheet number of drawings.

- B. Gibbs & Hill Topical Report GIBSAR-17 and implementing procedure QAI-G respectively state in part that, "The Vice Presidents or Assistant Vice Presidents responsible for engineering, project, procurement, construction and QA institute annual reviews in the areas under their cognizance.... Procedures for performing these reviews and audits are established in the G&H Quality Assurance Manual... (which states that) management reviews of the Engineering, Project, Quality Control, Procurement and QA Departments shall be performed on an annual basis timed so that the evaluation reports shall reach the QA Manager's desk no later than August 31, of each year. Similarly, the Corporate Overview of the QA Program shall be performed on an annual basis scheduled to follow issuance of the foregoing evaluation reports, but no later than September 30 of each year...."

Contrary to the above, the 1980 management review evaluation report of the Engineering Department was not performed until November 19, 1980.

1. Description of steps that have been taken or will be taken by Gibbs & Hill, Inc. to correct this item:

The normal conduct of the Company's business has led to conflicts with the prescribed dates for performing management reviews and QA program overview from competing demands on the responsible Vice Presidents' time.

Accordingly, procedure QAI-G of the corporate G&H QA Manual will be revised to delete reference to the August and September dates specified for the completion of the Management Review cycle. The procedure will state, instead, that an annual Management Review is required.

The revised procedure will be issued during the second quarter of 1981.

2. Description of steps that have been taken or will be taken to prevent recurrence:

Gibbs & Hill is presently evaluating the current Management Review procedure to determine whether new controls for monitoring this procedural change are required.

This evaluation of the procedure will be completed during the second quarter of 1981, by which time suitable controls will be instituted.

- C. Gibbs & Hill Quality Assurance Procedure QA-5 states in part that, "Each in-house engineering course is presented annually."

Contrary to the above, the Gibbs & Hill in-house technical training course entitled "Nuclear Engineering Course (T003)" is not being presented on an annual basis. The last Nuclear Engineering in-house course was given between the dates of March 30, 1978 and August 17, 1978.

1. Description of steps that have been taken or will be taken by Gibbs & Hill, Inc. to correct this item.

The completion of tasks assigned to Gibbs & Hill on the Comanche Peak Nuclear Project has led to a reduction in new hires for this project. It has been determined therefore that there is no longer a need for an annual presentation of the in-house nuclear course.

Procedure QA-5, Rev. 3, entitled, "Procedure for Indoctrination and Training," will be revised to state that the course will be presented on a periodic basis as necessitated by the number of new hires and transfers who have responsible input to nuclear safety related work.

The revised procedure will be issued during the second quarter of 1981.

In keeping with the revised procedure, the next time that the Nuclear Engineering Course will be presented will be during the second half of 1981.

2. Description of steps that have been taken or will be taken by Gibbs & Hill, Inc. to prevent recurrence:

It is intended to assign the responsibility for scheduling, initiating, arranging and documenting the course to the Training and Development Department. By concentrating the responsibility into this department, the periodicity for conducting the course can be directly related to the personnel hiring load.

Procedure QA-5 will be revised to reflect these changes by the second quarter of 1981.

QA Department will monitor the implementation of the new requirements in the Procedure for Indoctrination and Training.