

Gibbs & Hill, Inc.

ENGINEERS DESIGNERS CONSTRUCTORS

DIRECT DIAL EXTENSION

(212) 760-5026

June 9, 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 81-02
Docket No. 99900524/81-02

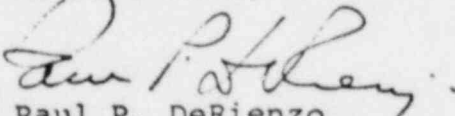
Enclosed is Gibbs & Hill's response as requested in your letter dated May 21, 1981 pursuant to the inspection of our QA Program conducted by Mr. D.F. Fox of your office on April 27 through May 1, 1981.

We have repeated the nonconformance given in the Notice of Nonconformance of your inspection report and followed with our response.

If you need any further information, please contact me or Mr. N. Keddis, Quality Assurance Manager.

Very truly yours,

GIBBS & HILL, INC.



Paul P. DeRienzo
Vice President
Quality Assurance

PPD:rc
Enclosure

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C-3 Findings

" a. Nonconformances

One nonconformance was identified in this area of the inspection as (See Notice of Conformance).

NOTICE OF CONFORMANCE

Base on the results of an NRC inspection conducted on April 27 through May 1, 1981, it appears that certain of your activities were not conducted in accordance with NRC requirements.

NRC Letter of Acceptance of the Gibbs & Hill Topical Report, GIBSAR-17-A (Quality Assurance Program), states in part that, "Programmatic changes by Gibbs & Hill, Inc. to this Topical Report are to be submitted to NRC for review prior to implementation. Organizational changes are to be submitted no later than 30 days after announcement."

Contrary to the above, programmatic and organizational changes made to the quality assurance program during the past year by Gibbs & Hill were not submitted to the NRC as required.

The following nonexclusive list of differences between the in-place QA program and the program described in the Gibbs & Hill Topical Report GIBSAR-17-A, through amendment 4 dated January 1979, were noted by the inspector:

- . Organizational structures and titles are different.
- . The Vice President, Consulting Engineering, QA and New Technology, has additional responsibilities and no longer reports to the Senior Vice President, Power and Energy.
- . The position of "Assistant to Vice President" has been added.
- . The actual in-place Engineering organizations, functions and QA interfaces are different.
- . The revisions of the Regulatory Guides endorsed by the in-place QA Program are different.
- . Review and approval of calculations and technical specifications by Engineering and Quality Assurance are not as described in the Topical Report. "

G&H Response:

At the present time, Gibbs & Hill does not have any U.S. nuclear power plant projects which are being designed and constructed under our Topical Report GIBSAR-17-A.

During this inspection, the NRC inspector was shown a draft of Amendment 5 to the Topical Report. This draft was undergoing intra-departmental review prior to senior management review and approval as prescribed by our existing procedures.

Corrective Action:

Amendment 5 to the GIBSAR-17-A Topical Report, which revises the G&H organizational structure and describes programmatic changes to the QA program identified in the Inspection Report, is presently undergoing senior management review and approval and will be submitted to the NRC in June 1981.

Preventive Actions:

To prevent recurrence, status reports will be issued semi-annually to the NRC irrespective of whether it is being applied to current domestic nuclear projects to inform them of any changes to the QA Program Topical Report GIBSAR-17-A.