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Washington Public Power Supply System

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October 12, 1982
G01-82-0716

Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

Attention: D. M. Sternberg, Chief
Reactor Construction
Projects Branch No. 1

Subject: NUCLEAR PROJECT NO. 1
NRC INSPECTION WNP-1
DATES OF INSPECTION APRIL 26-30, 1982
CONSTRUCTION PERMIT NO. CPPR-134

Reference: 1) Letter T.W. Bishop to R.W. Root, dated
June 7, 1982, NRC Inspection of Washington
Nuclear Project No. 1
2) Letter G01-82-0458, dated July 26, 1982,
same subject
3) Letter T.W. Bishop to R.W. Root, dated
August 6, 1982

As requested by you in reference three (3), the following revised response and additional information is provided for the corrective action for the noncompliance identified in reference one (1).

Revised Response

Corrective Action

A Construction Package System was devised by Shurtleff and Andrews and put into effect on a trial basis November 13, 1981. The Construction Package System was not used in lieu of the previously approved procedures but was in addition to. The purpose of this system was to better track work operations in the field where no system existed before. Craft personnel were instructed to only perform work as detailed in the package.

A training session was also conducted with all craft and Quality Assurance personnel. This training session covered a complete review of nonconformance requirements as outlined in the contract specification and QAP-1. The training session stressed the importance of notifying QA when a nonconformance occurred and that work could not proceed until an approved disposition could be obtained on a CNCR and the CNCR was included in the construction package.

D. M. Sternberg
Nuclear Regulatory Commission
Page Two
October 12, 1982
G01-82-0716

As part of the activities associated with completing the termination and closeout of the Shurtleff and Andrews contract, the contractor is required to verify and status their QA records with the as-built drawings which have been completed by them. Bechtel QC is performing in process surveillances of the contractor's statusing activities to ensure acceptability.

In addition, the Engineer (United Engineers and Constructors) will review the as-built drawings which are generated by Shurtleff and Andrews to determine if the installation shown on the as-built drawing is acceptable. Any conditions found unacceptable by the Engineer will be documented and appropriate corrective action taken.

Action to Preclude Recurrence

Shurtleff and Andrews had committed to formalize and write a procedure addressing the construction package program and incorporate it in their Quality Assurance program and procedures. Subsequent to the WNP-1 extended construction delay, the 207A contract was terminated.

It is not known at this time what contractor will complete the remainder of the structural steel installation. It is also not known if the contractor that completes the installation of the structural steel will implement a construction package system or if another acceptable method will be used for handling work in the field. Whatever system is used, the implementing procedure will have to be determined acceptable and approved by the Engineer prior to implementation. This item will be placed on the Supply System's status listing of actions requiring follow-up and completion prior to resumption of the structural steel installation.

Additional Information

The following is provided to clarify our response relative to the use of the construction package system utilized by Shurtleff & Andrews after November 13, 1982 as well as provide the requested additional information.

As is noted in the revised response, the establishment of the construction package system was not in lieu of previously approved procedures but was in addition to the approved program and procedures. The utilization of the construction package system in November was to aid in the collection of the various quality documents to preclude a recurrence of the condition identified by the NRC. The CMO (Bechtel Power Corporation) was fully cognizant of the contractor's intentions to utilize the construction package system since the contractor (S&A) had discussed this system with the CMO prior to initiation.

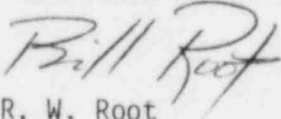
D. M. Sternberg
Nuclear Regulatory Commission
Page Three
October 12, 1982
G01-82-0716

In response to reference three (3) the following is provided. During the extended construction delay, work remaining for terminated contracts will be consolidated into the remaining contracts whenever possible. This will minimize the number of contractor interfaces on the Project.

An evaluation will also be performed of programs and procedures for existing contractors to assure that adequate procedures exist for control of work to be performed. This evaluation will be performed jointly by UE&C and Bechtel.

Upon restart of construction at WNP-1, the CMO will perform surveillances and audits of the construction contractors' activities. These surveillances and audits as well as the day-to-day interface with the contractor will provide assurance that safety related work is performed to approved procedures.

In addition to the CMO surveillances, Supply System Project QA will conduct random surveillances of the contractors' activities to provide an overview of the contractors' and CMO's effectiveness to control work to approved procedures.



R. W. Root
Acting Program Director (821)

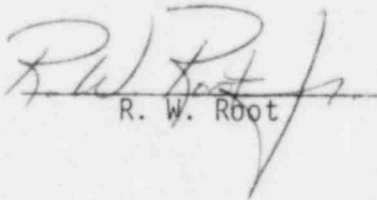
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cc: V. Stello, Director of Inspection, NRC
A. Toth, NRC (819)
J.D. Bateman, UE&C (895)
J.P. Laspa, Bechtel (861)
V. Mani, UE&C (897)

STATE OF WASHINGTON)
COUNTY OF BENTON)

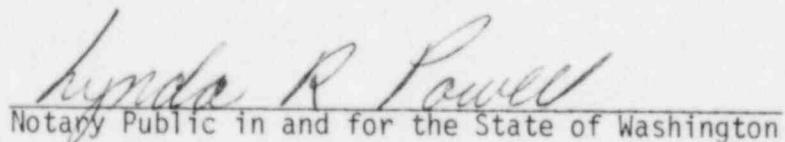
R. W. Root, being first duly sworn, deposes and says: That he is the Acting Program Director, WNP-1/4, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that he is authorized to submit the foregoing on behalf of said applicant; that he has read the foregoing and knows the contents thereof; and believes the same to be true to the best of his knowledge.

DATED October 12, 1982


R. W. Root

On this day personally appeared before me R. W. ROOT to me known to be the individual who executed the foregoing instrument and acknowledged that he signed the same as his free act and deed for the uses and purposes therein mentioned.

GIVEN under my hand and seal this 12th day of October, 1982


Notary Public in and for the State of Washington

Residing at Wickland