



Houston  
Lighting  
& Power  
Company

Electric Tower  
P.O. Box 1700  
Houston, Texas 77001

October 3, 1978  
ST-HL-AE-295  
SFN: C-0510

Mr. W. C. Seidle  
Chief, Reactor Construction  
and Engineering Support Branch  
USNRC, Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011

SUBJECT: Meeting with the NRC on August 15, 1978  
RE: 50-498 RPT. 78-13  
50-499 RPT. 78-13  
50-498 RPT. 78-12  
50-499 RPT. 78-12

Dear Mr. Seidle:

We appreciate the opportunity to meet with you concerning the South Texas Project Electric Generating Station Civil QA Program.

Attached is our response to the allegations presented in your report 50-498/78-12 and 50-499/78-12. Our in-depth review leaves us confident that the construction work performed meets the requirements for our project. The actions taken to correct any possible weaknesses in our quality assurance program are open to your review during future inspections. If you have any questions regarding this matter, please contact me.

Very truly yours,

E. A. Turner, Vice President  
Power Plant Construction and  
Technical Services

EAT/cas  
Attachment

cc: Mr. R. A. Frazar  
Mr. H. L. Key

7811020387

RESPONSE TO ALLEGATIONS

(RE: NRC Report 50-498/78-12 and 50-499/78-12)

Allegation No. 1:

Inability of civil QC inspectors to do their jobs due to issuance of new procedures without sufficient training in the new procedures before implementation.

A. Discussion:

Our review showed that attendance at training courses on the revised procedures was not mandatory for QC personnel. Therefore, unknown to B&R management, several inspectors did not attend. All inspectors were given a reading list including a check sheet which had to be signed acknowledging that he had read and understood each procedure.

B. Corrective Action:

The training was repeated and the reading lists reissued and signed.

C. Action Taken to Prevent Recurrence:

B&R will take attendance rosters to ensure that appropriate personnel have received required training. Make-up training will be conducted when needed.

Allegation No. 2:

The STP QA Program does not provide an adequate nonconformance reporting system.

A. Discussion:

There have been interpretational problems relative to the use of Nonconformance Reports (NCR) versus Field Requests for Engineering Action (FREA).

B. Corrective Action:

A clarification has been added to the B&R procedure stating definitively when an NCR is to be used and when a FREA can be prepared.

C. Action Taken to Prevent Recurrence:

HL&P site QA is closely monitoring nonconformance reporting by B&R and has increased the performance of surveillance of concrete placement inspection.

Allegation No. 3 and Allegation No. 4:

QA reluctance to issue Nonconformance Reports when problems are identified by QC. Inadequate support of QC inspectors by QA.

A. Discussion:

It was determined that only one NCR was not processed. This case involved an out of sequence approval sign-off of an inspection record and it was not appropriate to process the NCR since the condition was promptly corrected and no defective material was involved.

HL&P cannot find any evidence to substantiate these allegations; however, it appears that there is a need for more effective communication between the QC inspectors and QC supervision.

B. Corrective Action:

The B&R Project QA Manager is striving to spend more time in the field to ensure the effectiveness of the program. Additionally, the B&R Project QA Manager has counselled the B&R QA/QC staff relative to objectives of QA/QC and the necessity of reporting all departures from design, Codes, standards or safe practices. HL&P has conducted an extensive review of preplacement and placement activities to assure that quality has not been compromised due to the condition described by these allegations. No abnormalities were found during this review.

C. Action Taken to Prevent Recurrence:

HL&P site QA is closely monitoring B&R QA/QC activities.

Allegation No. 5:

Poor document control for drawings and documents used by craft and QC personnel.

A. Discussion:

Due to procedural differences, QC personnel in the field were not obtaining documentation in the same time frame as craft personnel. In spite of this delay, QC inspection personnel had, on their own initiative, actively sought out the correct documentation when disparities were noted between craft and QC documentation.

B. Corrective Action:

Extensive review of previous work has been done to ensure that no work was accepted to incorrect design documentation. Additionally, the procedure for providing documentation to the inspectors has been revised to ensure proper processing with runners assigned to distribute new documents and pick up out-dated revisions from the field.

C. Action Taken to Prevent Recurrence:

In addition to the revised procedure for transmitting documents to the inspectors, air conditioned work stations were ordered and are now being received to provide better conditions for inspectors to review documentation and prepare for upcoming inspections.

Allegation No. 6:

Inaccurate Cadweld as-built drawings.

A. Discussion:

This allegation has been made several times before and has been shown by extensive review by B&R, HL&P and the NRC to be unsubstantiated. Another review by B&R and HL&P has reached the same conclusion.

B. Corrective Action:

No corrective action was required.

C. Recurrence Control:

HL&P will continue to monitor this item to ensure compliance with the procedures.

Allegation No. 7:

Inaccessibility of upper management.

A. Discussion:

In order to provide more effective management of the QA/QC program, the B&R Project QA Manager has recently reorganized the site QA/QC organization and redefined some job descriptions. As a result of the changes, some QC inspectors are unhappy because they feel they no longer have the latitude they need to perform their job. Our review showed these opinions were unjustified. Effective systems for identification of problems to management are implemented.

B. Corrective Action:

B&R management has reaffirmed, by memo and personal meeting, that it is the responsibility of the inspectors to identify problems and concerns. Additionally, they have been directed that they may pursue valid concerns past their immediate supervisor, even if he disagrees with them, without fear of reprisal.

C. Recurrence Control:

The B&R Project QA Manager has initiated more frequent observations and discussions in the field with the inspectors in order to provide visibility of management concern and opportunity to discuss QC inspectors' concerns. HL&P site QA personnel will continue to be receptive to reviewing QC inspectors' concerns.

Allegation No. 8:

Undue pressure by Construction.

A. Discussion:

There are pressures on the Inspectors to perform in a timely and expeditious manner as well as to assure quality; however, if the inspector performs his job effectively, we do not view these pressures as abnormal. There have been occasions when preplacement "punchlists" appeared abnormally long. The quantity of items on these lists made the inspector think that the Construction engineer was not properly assuming his responsibility or that construction was trying to pass off incorrect work. It is our opinion that these types of findings are those that QC inspectors should find, but the quantity concerns us.

B. Corrective Action:

B&R Construction has directed its Construction engineers and craft foremen to ensure that craft personnel are making every effort to meet the project requirements. When compliance with specification or procedure requirements cannot be met within the limitations of the design, either the FREA or NCR system will be utilized to resolve the problem. Additionally, the use of the "punchlist" has been modified to allow anyone who identified an item to enter the information on the punchlist. B&R will assign additional personnel to Construction Engineering to perform construction inspection of inprocess work.

C. Recurrence Control:

The B&R Project QA Manager has initiated more frequent observations and discussions in the field with the inspectors in order to provide visibility of management concern and opportunity to discuss QC inspectors' concerns. As stated earlier, HL&P site QA personnel will continue to be receptive to reviewing QC inspectors' concerns.

In addition, HL&P QA management has met with the B&R QC Inspectors and Supervisors to review the project objectives and the role of QA/QC in achieving those objectives. Emphasis was placed on the absolute necessity of team work to do the job right and to utilize the available problem solving channels for identifying and resolving project problems. Plans for enhancing the effectiveness of our program were reviewed also.

Allegation No. 9:

Performance of repairs without approved procedures.

A. Discussion:

There have been occasions where repair procedures were authorized via the telephone prior to obtaining an approved FREA.

B. Corrective Action:

The use of telephone minutes has been restricted solely to interpreting the intent of design documents. In all other cases either the FREA or Document Change Notice (DCN) system must be used. Those cases involving lack of approved procedures have been reviewed and no unacceptable conditions were found. B&R Engineering will transfer appropriate responsibility to the the Construction engineers or to design engineers assigned to the field to enhance resolution of field engineering problems.

C. Recurrence Control:

B&R QA/QC and HL&P QA will continue to monitor ongoing repair activities to ensure compliance with the procedural requirements.

Allegation No. 10:

Inability of Construction Engineering.

A. Discussion:

As noted earlier, the quantity of items on the construction "punchlist" tends to indicate that the craft personnel, craft foreman and Construction engineers are either not fully aware of procedural requirements or have not consistently implemented these requirements.

B. Corrective Action:

B&R QC and Construction forces have been counselled with regard to their responsibilities and methods to be used in the effective supervision of their personnel. Additional training will be provided to both Construction and QC personnel. B&R Construction engineering will assign additional personnel to perform inprocess review of work to ensure the design documents and construction procedures are met.

C. Recurrence Control:

Both HL&P QA and Construction Division personnel have stepped up their surveillance of construction activities to ensure compliance. Also, more effective supervision will be provided by B&R to both Construction and QC on all shifts.