

STONE & WEBSTER ENGINEERING CORPORATION



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Nuclear Regulatory Commission
Attention: Mr. Uldis Potapovs, Chief
Vendor Inspection Branch
Office of Inspection and Enforcement
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76012

July 9, 1982

Reference Docket No. 99900509/82-01

Gentlemen:

This letter responds to your June 10, 1982 report of the findings from your inspection conducted at our facilities in Boston, Massachusetts and Cherry Hill New Jersey on March 8-12, and March 22-26, 1982. Our response to each of the items listed on the Notice of Nonconformance included with your report is as follows:

A. Summary of Nonconformance

All required experience records for designers in the electrical and the engineering mechanics division (Boston office) were not prepared or updated by March 1, 1982, as committed to the NRC.

Corrective Action

Initial response to this observation was contained in a SWEC letter to the Commission dated April 2, 1982, as is repeated in its substance below.

A 100% review to demonstrate that Experience Records are up to date has been completed by appropriate managers. The Engineering Assurance Division subsequently conducted a series of reviews to verify that SWEC requirements for Experience Records have been met. The last Engineering Assurance review was conducted on June 23, 1982 and reported to Engineering Management on June 30, 1982 as the final verification that the SWEC requirements had been met.

Preventive Action

Because of the nature of the contributing complications, a recurrence of this type of nonconformance is not expected. SWEC commitments, including those made to the NRC, are currently tracked by an Action

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Log to ensure that commitments are met. All appropriate personnel have been reminded that failure to meet a commitment without adequate justification, prior notification of schedule slippage, and establishment of a new commitment date is a serious matter which warrants close management attention.

B. Summary of Nonconformance

Contrary to the requirements of EAP 5.3, an assumption made in calculation 12179-US(B)-221 stated that all areas sealed with weather-stripped doors will maintain their integrity when exposed to the effects of high energy line breaks from adjacent areas. This assumption was not identified as an assumption that must be confirmed and there was no confirmation made to assure that the doors specified would withstand the pressures generated in adjacent compartments.

Corrective Action

Project calculation US(B)-221 was revised to indicate the requirement for confirmation and re-issued on March 11, 1982. In addition, all Nuclear Technology Division calculations associated with high energy line breaks outside containment prepared for the Project will be reviewed and requirements for confirmation added as necessary. This action will be completed on or before August 13, 1982.

Preventive Action

To assure consistency in approach to High Energy Line Break (HELB) analysis by all SWEC Projects, and to prevent recurrence of the identified nonconformance, a Problem Report (PR-NT-2) was issued on March 18, 1982. This Problem Report delineates the review required during analysis to verify the integrity of boundaries between areas isolated from the effects of a HELB and adjacent areas subject to HELB effects.

This Problem Report requires response by all SWEC nuclear Projects in accordance with SWEC Engineering Assurance Procedure (EAP) 16.1 "Problem Report System."

Handwritten notes:
PDC
2/28/82-10
Completed
EAP 16.1
Complied 10/1/82

C. Summary of Nonconformance

Contrary to the requirements of EAP 5.3, HVAC calculation 12210-PB-196 for the control building cooling load contained input information that was not confirmed and "Yes" was not checked to indicate that confirmation was required at a later date.

The inputs noted that required later confirmation were: (1) GE Supplied information identified as preliminary; and (2) heat load information provided by memo for computer equipment without knowing the final configuration or supplier of the computer.

Corrective Action

As noted on page 5 of the Inspection Report the condition identified by the NRC inspector has been identified during an SWEC internal audit

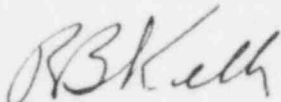
of the River Bend Project, however at the time of the NRC inspection, the corrective/preventive action had not yet been established.

As indicated in the NRC Inspection Report the specific calculation was corrected during the inspection by revising the calculation to indicate that confirmation was required. All Power Division calculations for the River Bend Project of the types identified by the SWEC internal audit as having deficiencies (which included HVAC calculations) have been reviewed and corrected as necessary to conform with EAP 5.3 requirements for evidence of the confirmation required indication. This action was completed by the Project and follow-up verification was conducted by the internal audit group on June 30, 1982 to assure the adequacy of the action taken.

Preventive Action

A memorandum was issued by the Project on May 17, 1982 imposing additional control requirements on preparers of power calculations and restating reviewer responsibilities to ensure that EAP 5.3 requirements are met. Calculations prepared by all Projects will continue to be monitored by SWEC internal audits.

Very truly yours,



R.B. Kelly
Vice President, Quality Assurance

