

ORGANIZATION: BECHTEL POWER CORPORATION
LOS ANGELES POWER DIVISION
NORWALK, CALIFORNIA

REPORT NO: 99900521/82-03	INSPECTION DATE(S) 6/21-25/82	INSPECTION ON-SITE HOURS: 32
CORRESPONDENCE ADDRESS: Bechtel Power Corporation Los Angeles Power Division ATTN: J. V. Morowski, Vice President and General Manager P. O. Box 60680, Terminal Annex Los Angeles, CA 90060		
ORGANIZATIONAL CONTACT: R. L. Patterson, QA Manager TELEPHONE NUMBER: (213) 864-6011, ext. 2061		
PRINCIPAL PRODUCT: Architect Engineering Services		
NUCLEAR INDUSTRY ACTIVITY: The Los Angeles Power Division, Houston Area Office, is responsible for the design, procurement, and construction management of the South Texas Project, Units 1 and 2. At the present time, the Houston Area Office has a staff of 773 working on the South Texas Project.		
ASSIGNED INSPECTOR:	<u>C. J. Gostello</u> J. R. Gostello, Reactor/Systems Section (RSS)	<u>7/29/82</u> Date
OTHER INSPECTOR(S):		
APPROVED BY:	<u>C. J. Hale</u> C. J. Hale, Chief, RSS	<u>7/29/82</u> Date
INSPECTION BASES AND SCOPE:		
A. <u>BASES</u> : 10 CFR Part 50, Appendix B, and Topical Report No. BQ-TOP-1.		
B. <u>SCOPE</u> : This inspection was conducted to assess the effectiveness of Bechtel's QA program in the area of audits and to check on the status of previous inspection findings.		
PLANT SITE APPLICABILITY:		
The contents of this report relate to Docket 50-498 and 50-499.		

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DESIGNATED ORIGINAL
Certified By Chance Jouts

ORGANIZATION: BECHTEL POWER CORPORATION
LOS ANGELES POWER DIVISION
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A. <u>VIOLATIONS:</u> None		
B. <u>NONCONFORMANCES:</u> 1. Contrary to the requirements of Criterion V of 10 CFR Part 50, Appendix B, and Section 18, Project Quality Program Manual, the Monthly Audit Activity Report was not distributed to Division QA or Project Management. No written response is required for this nonconformance as corrective and preventive actions were taken prior to the close of the inspection. 2. Contrary to the requirements of Criterion V of 10 CFR Part 50, Appendix B, and Quality Assurance Department Procedure QADP-5.1, the Quality Element Checklist was not signed and dated by the Lead auditor. No written response is required for this nonconformance as corrective and preventive actions were taken prior to the close of the inspection.		
C. <u>UNRESOLVED ITEMS:</u> None		
D. <u>STATUS OF PREVIOUS INSPECTION FINDINGS:</u> (Closed) Unresolved Item (82-01): It is not apparent that the present method of verifying indoctrination and training of Quality Assurance Engineers and project personnel is adequate. The practice of using signatures, initials, and dates in the training records to show completion of indoctrination and training does not provide a measure of comprehension of the subject matter. Bechtel policy does not require written examinations to verify comprehension of indoctrination and training subject matter unless such examinations are required by Codes, Standards, or Regulations. Proficiency of individuals performing quality-related work is verified by management review of work performed, formal inspections, project QA audit and surveillance, QA management audits, and supervisory interviews.		

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RESULTS:

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The South Texas Project plans to use group leaders to monitor and audit training comprehension and will establish a Quality Engineering Monitoring plan similar to EDPI-2.13.1 (used at Ann Arbor) to monitor instruction and training. Also, this area will be audited by QA.

E. OTHER FINDINGS OR COMMENTS:

Audits - Applicable PSAR commitments, quality assurance procedures, and project procedures were examined to determine quality program commitments. To verify implementation of these commitments, the following documents were examined: one audit activity report, a quality audit schedule, a quality assurance master audit plan, three quality element checklists, three audit activity reports, a corrective action request log, three corrective action requests, six training records and a South Texas Project signature list. Relative to the documents examined, two nonconformances were identified (see B. above). Corrective and preventive actions were taken regarding these nonconformances prior to the close of the inspection. These actions were as follows:

- . Nonconformance B.1 - The May Audit Activity Report was redistributed to the proper distribution on June 23, 1982. This was the first monthly Audit Activity Report issued and it was issued to the Site Project Quality Assurance Engineer. Project Quality Assurance was made aware of the proper procedural distribution of this report.
- . Nonconformance B.2 - Audits 1.1, 2.1, and 5.1 were the first three project quality assurance audits conducted on the South Texas Project. The Lead auditor responsible for the audits signed and dated the first three Quality Element Checklists prior to the close of the inspection. Both project Quality Assurance Lead Auditors and the Project QA manager were made aware of this procedural requirement.

The following items of concern were identified for followup in a future inspection:

1. Paragraph 3.5 of Section 18, "Project Quality Program Manual" states, "The Project Quality Assurance Manager is responsible for submitting a monthly summary of Quality Assurance activities which includes the results of audits to the Quality Assurance Manager of the Los Angeles Power Division." However, paragraph 10.1 of QADP 3.6 states, "During the time period project activities are in the design phase and confined to the design office, distribution of the Quality Assurance Monthly Activity Report shall include the Quality Assurance Manager/Projects, Project Manager and Project Engineer."

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The last Quality Assurance Monthly Activity Report was sent to the Quality Assurance Manager/Projects while the six previous reports were sent to the Quality Assurance Manager of the Los Angeles Power Division.

This conflict in procedures will be considered further during subsequent inspections.

2. On the South Texas Project Signature List, some of the signatures or initials or both were missing. Also, STP General Project Requirements procedure 2.11, "Document Signature and Initial Identification" has a requirement that Project Administration will review the Project Signature List at least every two months. This requirement is not auditable with the present format of the signature list. In discussing this matter with the Project Administration Manager, it was disclosed that they are planning to change the present system to a more efficient system utilizing signature cards. This problem will be reviewed during the next inspection.
3. In reviewing Audits 1.1, 2.1, and 5.1 it was noted that there was a requirement that persons contacted during an audit were to be listed on the Quality Element Checklist and were also to be listed on the Audit Activity Report. A review of these documents showed that not all names were listed on both lists. The names are as follows:

Audit No.	Listed on Quality Element Checklist, but not on Audit Activity Report	Listed on Audit Activity Report, but not on Quality Element Checklist
1.1	C. Speck	D. Hauglum
2.1	R. L. Rogers T. C. Smith	M. Lawson G. Lopez P. Kakkad J. LeBlanc R. Ramsey
5.1		G. McConnell

This problem will be reviewed further during the next inspection.

DOCUMENTS EXAMINED

Inspector J.R. Costello
 Scope/Module Audits/40990B

1	2	TITLE/SUBJECT	3	4
14	0	Corrective Action Request Log	-	-
15	3	General Project Requirements 2.11 - Document Signature And Initial Identification	4/16/82	0
16	3	Section 3 Project Quality Program Manual - Design Control	3/31/82	1
17	3	Section 18 Project Quality Program Manual - Audits	3/31/82	1
18	0	Quality Element Checklist 2.1-1 - Industrialization and Training	5/24/82	0
19	0	Audit Activity Report for Audit 2.1	5/25/82	-
20	0	Quality Element Checklist 5.1-1 - Instructions, Procedures And Drawings	5/3/82	0
21	0	Audit Activity Report for Audit 5.1	5/4/82	-
22	0	CAR 82-2.1-1.1 Records Management System and Administrative Document Control could not provide objective evidence of how industrialization and training is being conducted	6/2/82	1 -
23	0	CAR 82-2.1-1.2 Engineering Department could not	6/2/82	-

Columns:
 1. Sequential Item Number
 2. Type of Document
 3. Date of Document
 4. Revision (If applicable)

Document Types:
 1. Drawing
 2. Specification
 3. Procedure
 4. QA Manual
 5. Purchas Order
 6. Internal Memo
 7. Letter
 8. Other (Specify-if necessary)

Inspector J.R. Costello
 Scope/Module Audits/40990B

DOCUMENTS EXAMINED

1	2	TITLE/SUBJECT	3	4
1	8	Topical Report BP-TOP-1	10/80	3A
2	3	QADP 5.1 Project Quality Assurance Audits	11/16/81	15
3	3	QADP 5.3 Quality Assurance Management Audits	11/16/81	8
4	3	QADP 7.7 Handling of Significant Reportable Deficiencies	4/5/82	9
5	3	QADP 7.8 Report of Defects And Noncompliance	4/6/82	3
		10 CER Part 21		
6	3	QADP 7.10 Corrective Action	2/5/82	11
7	3	QADP 8.1 Qualification of Auditors	5/30/82	8
8	8	Part B Bechtel Power Corporation Quality Assurance Program Description, South Texas Project	3/2/82	3
9	8	Audit Activity Report - May	6/2/82	-
10	8	Quality Audit Schedule 1982	4/23/82	0
11	8	Quality Assurance Master Audit Plan For Engineering, Procurement and Records Management Part A	5/17/82	1
12	8	Quality Element Checklist 1.1-1 - Organization	5/13/82	0
13	8	Audit Activity Report for Audit 1.1	5/18/82	-

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Inspector J. R. Costello
Scope/Module Audits/40990B

DOCUMENTS EXAMINED

1	2	TITLE/SUBJECT	3	4
		provide objective evidence that indoctrination and training is in accordance with requirements of EOP 5.34 Rev.1		
24	B	CAR 02-5.1-1.1 Records Management System and Administration to describe responsibilities and activities	5/6/02	-
25	B	Training Records of K.R. Datterer, Y. Sandra-Orabi, S.M. Dugas, J.P. Cook, C.E. Hertz and J.F. Price	-	-
26	B	South Texas Project Signature List	-	-

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1. Drawing
 2. Specification
 3. Procedure
 4. QA Manual

5. Purchas Order
6. Internal Memo
7. Letter
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