

QAS-82/245

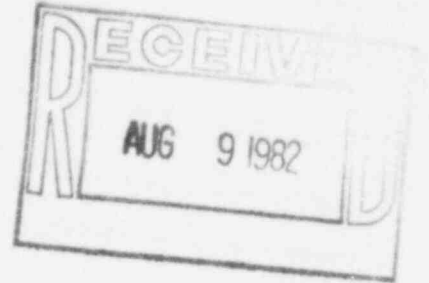
Bechtel Power Corporation

Engineers—Constructors

15740 Shady Grove Road
Gaithersburg, Maryland 20760
301-258-3000



August 4, 1982



Mr. U. Potapovs, Chief
Vendor Inspection Branch
U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

Dear Mr. Potapovs:

Reference: Letter, July 6, 1982; U. Potapovs, USNRC, to
J. M. Komes, Bechtel Power Corporation
Docket No. 99900519/82-02

This letter is in response to the referenced letter which transmitted the report of your inspection of the Gaithersburg Power Division Quality Assurance Program. The inspection was conducted by Mr. J. R. Costello of your office on May 17-21, 1982.

The attachment to this letter contains our response to your report, including a description of corrective action, steps being taken to prevent recurrence, and the dates corrective action will be completed.

Your Inspection Report No. 99900519/82-02 contains no information which we believe to be proprietary.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. M. Komes".

J. M. Komes
Vice President and General Manager

JMK/dkh

Attachment

820 8240 217

NRC INSPECTION REPORT
No. 99900519/82-02
Notice of Nonconformance

Criterion V of Appendix B to 10 CFR 50 states:

"Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

The nonconformances and Bechtel's response for each noted nonconformance from these requirements is as follows:

- A. Engineering Department Procedure (EDP) 7.5, "Engineering Department Signature and Initials Identification," contains the following requirements.
1. Section 2.0 - Longhand initials rather than printed initials shall be used to provide uniqueness.
 2. Section 3.0 - Steps shall be taken for establishment of the complete set of individual signature identification cards, Exhibit A, for all Engineering Department personnel whose duties involve signing or initialing design documents.

Contrary to the above, several individual signature cards had printed initials rather than longhand initials and the individual signature identification cards of Houshang Safaipour, Bai-Burch K. Blyden, Goutam Bhattacharyya, and R. A. Williams were not properly filled out. One was missing the initials, entirely, and the others repeated the signature or part of the signature instead of the initials.

Response:

Remedial Corrective Action

A review of all signature cards in the central file was completed by June 11, 1982. Of the 1600 cards, 34 were found to be incorrectly filled out (2.1% error rate). Types of errors included missing signatures/initials, and use of other than black ink. These errors are being corrected and are expected to be complete by August 31, 1982.

Action To Prevent Recurrence

EDP 7.5, Revision 2, issued on June 25, 1982, removed the longhand requirement on signature cards and stressed the importance of the traceability and reproducibility of signatures/initials on design documents. The Supervisor of Personnel Records of the Personnel Department is responsible for issuing signature cards to all incoming technical Engineering Department personnel (new hires) and to transferees. The cards are transmitted to the Supervisor, Administration and Records Management who is responsible for checking the signature cards against the list of Engineering Department personnel.

- B. SNUPPS EDPI-4.46-01, "Project Engineering Drawings," contains the following requirements: Section 9.0.A.3, "All outstanding DCN's must be incorporated into its applicable drawing, and that drawing must be issued within 90 days of the issue date of the first (oldest) DCN, or within 45 days after the 5th DCN is issued, whichever date comes first."

SNUPPS EDPI-4.47-01, "Drawing Change Notice," contains the following requirements: Section 2.3.2, "DCN's involving surface-mounted/embedded plates on civil drawings will be incorporated into the parent drawing within 120 days of the issue date of the first DCN. This exception will be in effect until August 31, 1982."

Grand Gulf PEPM 4.3.1.6, "Drawing Revisions and Log," contains the following requirements: Section 4.3.1.6.1, "All outstanding DCN's against a drawing must be incorporated no later than 90 days after issue of the DCN."

Contrary to the above, a sample examination of 21 drawings on the SNUPPS project disclosed that drawing revisions to incorporate outstanding DCN's on M-02LF01 and C-062323 [C-0C2323] were overdue. A sample examination of 10 Grand Gulf drawings showed that drawings C-1415L and C01356H had not met the 90-day criteria for incorporation of drawing changes. There was conflict in requirements between EDPI-4.46-01 and EDPI-4.47-01 in that Drawing C-062323 [C-0C2323] met the requirements of EDPI-4.47-01, but did not meet the requirements of EDPI-4.46-01.

Response

Remedial Corrective Action (SNUPPS and Grand Gulf)

All DCNs outstanding beyond the required time limit will be incorporated into applicable drawings by August 13, 1982.

Action to Prevent Recurrence (SNUPPS)

The adherence to EDPI requirements for the incorporation of DCNs was discussed with all project engineers and group supervisors at the weekly project meeting on July 13, 1982. Quality Engineering will continue to notify the project monthly of the status of drawings which must be revised to incorporate outstanding DCNs.

SNUPPS EDPI-4.46-01 has been revised to remove the conflict with EDPI-4.47-01. Revision 17 of EDPI-4.46-01 will be issued with the next change to the Project Engineering Procedures Manual (PEPM) which is expected by August 31, 1982.

Action to Prevent Recurrence (Grand Gulf)

Each discipline has established a log to track open DCNs and, effective July 30, 1982, will issue to responsible personnel a monthly "tickler list" identifying those DCNs to be incorporated into drawings within the next calendar month. Group Supervisors re-emphasized the incorporation of DCNs per PEPM 4.3.1.6.1 with discipline personnel in training sessions completed on July 23, 1982.

- C. Grand Gulf Policy No. QGG-2[2.1], "Quality Program Basis," contains the following requirement: Section 5.1, "Project Engineering procedures shall provide for the following . . . Identification of the technical codes and standards - National, State, and Local - which will apply to the project. Applicable dates, revisions, or addenda shall be identified."

Contrary to the above, a sample inspection of Grand Gulf specifications disclosed that specification J-606.0 and M-617.1 did not specify all of the dates, revisions or addenda.

Response

Remedial Corrective Action

Remedial action will not be taken for specification 9645-M-617.1 identified in the nonconformance as equipment shipments to the Grand Gulf jobsite against the related purchase order have been completed. Specification 9645-J-606.0, also identified in the nonconformance, and ten other "Q" specifications associated with open purchase orders for equipment will be revised to identify all of the applicable dates, revisions, or addenda of referenced codes and standards. This remedial action is expected to be completed by November 15, 1982.

Action to Prevent Recurrence

Effective August 2, 1982, each new specification, when initially issued for the purchase of equipment, will identify the applicable dates, revisions, or addenda of technical codes and standards included in the specification.