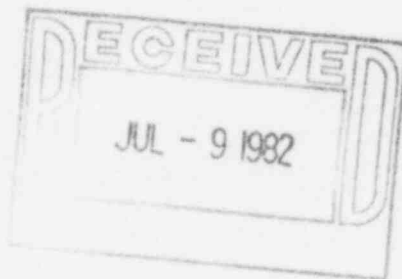


 **united engineers** & constructors inc.
30 South 17th Street
Post Office Box 8223
Philadelphia, PA 19101

BOSTON
DALLAS
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KNOXVILLE
PHILADELPHIA
VALLEY FORGE

July 1, 1982

Mr. Uldis Potapovs, Chief
Vendor Surveillance Branch
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



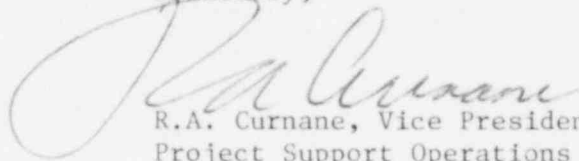
Dear Mr. Potapovs:

Docket No. 99900510/82-02

This letter acknowledges receipt of your Inspection Report dated June 8, 1982 for an inspection conducted by Messrs. D.D. Chamberlain and J.T. Conway at United Engineers and Constructors Inc. in Philadelphia, Pennsylvania on April 19-23, 1982 and at Seabrook, New Hampshire on April 5-8, 1982.

Three Nonconformances were identified by your staff. We have enclosed for your information and review the corrective and preventive actions which have been taken and the completion schedule.

Sincerely,


R.A. Curnane, Vice President
Project Support Operations

RAC/BCL/Et

Attachment

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UE&C Statements of Corrective Action

Nonconformance A

Appendix II, Figure V of Topical Report UEC-TR-001-5A, APPLICABLE STANDARDS AND REGULATORY GUIDES, lists Regulatory Guide 1.64, Quality Assurance Requirements for the Design of Nuclear Power Plants, which endorses N45.2.11.

ANSI N45.2.11, Section 8.2, states in part: ". . . the procedures for effecting design changes shall require that the documents which reflect the design change be reviewed and approved by the same groups or organizations which reviewed and approved the original design documents."

Contrary to the above, Administrative Procedure No. 15, Revision 14, Changes to Project Documents, ECA/RFI FORM INSTRUCTIONS AND DISTRIBUTION, allows "minor" design changes to be reviewed and approved by the responsible site engineer (RSE), only, and the list which identifies "minor changes," has no review and approval requirements.

UE&C Corrective Action

Engineering Change Authorization No. 741645B to Administrative Procedure 15, Revision 14 was issued June 7, 1982 to require that ECAs classified as "minor" be prepared by a responsible site engineer and, if safety related, approved by a second site engineer after confirming that all required interdiscipline review was completed. The ECA specifies that changes may be classified as minor if identified on a listing prepared by Site Engineering. The memorandum issuing the Minor Change List is approved by the Home Office and Site Engineering Managers, Quality Assurance and YAEC prior to issue.

Action Taken to Prevent Recurrence - See Above

Date of Corrective Action Completion

June 7, 1982

Nonconformance B

Section 17.1.3.1 of Topical Report UEC-TR-001-5A, states in part: "Applicable Regulatory requirements and design bases for safety related structures, systems, and components are translated into specifications, drawings, procedures, and instructions. Measures which assure correct translation of the requirements are documented in QA Procedures and General Engineering and Design Procedures (GEDPs). The GEDPs establish provisions for the preparation, review and approval of engineering documents including the Systems Design Description and Structural Design Criteria."

DESIGNATED ORIGINAL

Certified By Kheanne Jouts

UE&C Statement of Corrective ActionNonconformance B (continued)

Contrary to the above, the applicable GEDP provisions of Section III and V of GEDP-5, Preparation, Documentation and Control of Calculations, were not being implemented for the preparation, review, and approval of a calculation on conduit and cable tray support weld adequacy (Conduit Support Calculation, dated April 25, 1980) in that: (1) the calculation had approximately six pages that were not checked; (2) no calculation number was assigned; (3) the calculation was not marked as preliminary or final; and (4) no cover sheets were included with the calculation.

UE&C Corrective Action

The Conduit Support Calculation has had a calculation number assigned and a cover sheet provided. The six pages that had not been checked were checked and initialed and the calculation was identified as final. A review of all other final support calculations was made and it was determined that the calculations were in accordance with procedural requirements.

Action Taken to Prevent Recurrence

Training sessions on GEDP-5 "Preparation, Documentation and Control of Calculations" were presented to the pertinent project personnel on May 18, 23 and June 3, 1982.

Date of Corrective Action Completion

June 3, 1982

Nonconformance C

Criterion V of Appendix B to 10 CFR Part 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."

Section 4.12.3 of Project Procedures No. 34, Project QA Records, for WNP Nuclear Project No. 1 states in part: "The DDC shall maintain a file of . . . PCR's. The file shall be microfilmed periodically and a diazo microfilm sent to the Field Document Control Center."

Contrary to the above requirements, records and information made available to the inspector indicate that the last Project Change Request (PCR) was microfilmed in January 1978. Project Change Proposal (PCPs) superseded PCRs in October 1980. There was no evidence that any PCP had been microfilmed with a copy sent to the Field Document Control Center.

Nonconformance C (continued)

UE&C Corrective Action

All Project Change Requests (PCRs) generated at the Home Office have been microfilmed. Approximately 500 PCRs generated at the jobsite will be microfilmed by July 30, 1982.

All Project Change Proposals (PCRs) approved as of June 21, 1982 have been microfilmed.

Action Taken to Preclude Recurrence

Project Procedure No. 34 will be revised to require microfilming at six month intervals rather than periodically to establish a fixed schedule for microfilming.

Date of Corrective Action Completion

Microfilming of PCRs (Home Office)	-	June 22, 1982
Microfilming of PCRs (Site)	-	July 30, 1982
Microfilming of PCPs	-	June 22, 1982
Revision of PP-34	-	August 15, 1982