

# Bechtel Power Corporation

Engineers - Constructors

12400 East Imperial Highway

Norwalk, California 90650

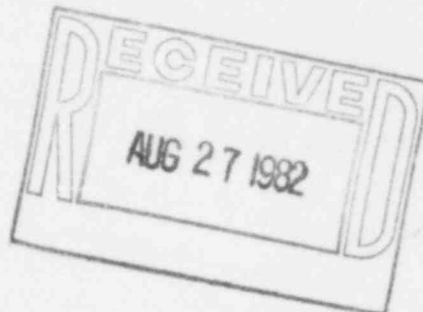
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August 16, 1982



Uldis Potapovs, Chief  
Vendor Programs Branch  
United States Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

Reference: Letter dated July 28, 1982, to J. V. Morowski  
Subject: Docket No. 99900521/82-02

Dear Mr. Potapovs:

The Vendor Programs Branch Inspection Report enclosure to the referenced letter describes certain Bechtel Los Angeles Power Division activities which failed to meet NRC requirements.

Attachment I is submitted in response to your letter and the NRC Division IV Vendor Program Branch Inspection Report.

There is no proprietary information in your letter or our response.

Sincerely,

BECHTEL POWER CORPORATION

A handwritten signature in cursive script, appearing to read "L. G. Hinkelman".

L. G. Hinkelman  
Vice President & General Manager

JVM:AGC:1h

Attachment: Response to Reference Letter dated July 28, 1982

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PDR GA999 EECBECH  
99900521 PDR

Following is the description of the nonconformance identified in Appendix A to your letter and the LAPD corrective action response to the nonconformance:

Nonconformance

- A. Engineering Department Procedure (EDP) 4.66, "Substantial Safety Hazard and Significant Deficiency Report (Deficiency Evaluation Report)," Revision 2, dated October 24, 1980, contains the following requirement in Section 4.2.e. "After signing and dating the Deficiency Evaluation Report (DER) the initiator shall forward the report directly to the responsible Quality Assurance Engineer (QAE) for confirmation of completeness and for DER logging."

Contrary to the above, five out of six DER's examined did not comply with the requirement that the initiator sign and date the DER's. The DER's that did not comply were DER 81-57, DER 81-15, DER 82-14, DER 82-18, and DER 81-13.

Corrective Action

1. Steps that have been taken to correct this item:

The initiation date of all DER's including those listed above is reflected in Block 1 adjacent to the DER number. Redundant dating in the block for initiator's signature is not required. Therefore, this item is not a nonconformance.

The above listed DER's contained the typed name of the initiator in lieu of initiator's signature in violation of project and division procedures. Further review revealed that the majority of DER's issued by the Palo Verde project have the same condition. This condition also exists to a lesser degree on DER's issued by other LAPD projects.

Retrofit to obtain initiator's signatures on DER's previously issued was not accomplished. All DER's are reviewed, signed, and dated by the Project QA Engineer (validation block) as a part of the DER initiation process. This signature attests to the DER authenticity which includes initiator's identity.

The initiator's signature will be on all future DER's issued.

2. Steps taken to prevent recurrence:

Project QA Engineers were instructed to assure that DER's contain the initiator's signature prior to validation. Additionally, the Division QA Staff will review future LAPD DER's to assure initiator has signed the DER.

3. Dates that corrective actions and preventive actions were completed.

June 22, 1981