

STONE & WEBSTER ENGINEERING CORPORATION



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Nuclear Regulatory Commission
Region IV
Attention: Mr. Uldis Potapovs, Chief
Vendor Program Branch
Office of Inspection and Enforcement
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

December 20, 1982

J.O. No. 13387.50
EA-1073

Reference Docket No. 9990509/82-02

This letter responds to your November 18, 1982 report of the findings from your inspection conducted at our facilities in Boston, Massachusetts, and Cherry Hill, New Jersey, on August 16-20 and August 30-September 3, 1982. Our response to each of the items listed on the Notice of Nonconformance included with your report is as follows:

Summary of Nonconformance

Preparation and control of pipe stress analysis and support calculation packages for certain I&E Bulletin 79-14 Activities (Boston office) were not in accordance with Sections 8.2 and 8.3 of the NUPIPE Stress Analysis and Supports Evaluation Procedure in the following areas:

1. Completed packages for work completed prior to August 14, 1981, did not become a permanent part of plant records.
2. No completed Form Z documents were available for NRC inspector review.
3. The Engineering Assurance (EA) "Action Items Tracking Log - EA Audits Projects" listed 17 documents that identified unsatisfactory conditions or questions from EA audits of stress calculation packages as unresolved as of August 19, 1982.

Response - Item 1

Cause

Completed packages for certain work completed prior to August 14, 1981 did not become a permanent part of plant records due to the special nature of the evaluation process. To complete the reanalysis effort by the required date SWEC temporarily waived certain of its detailed administrative requirements for calculation documentation with the stipulation that the documentation be subsequently updated to satisfy those requirements. The initial documentation was not made part of permanent plant records because it was not considered complete with

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respect to SWEC standard practice. The subsequent effort of updating the documentation, which included in some cases replacing selected pages of the initial documentation, was viewed as record completion. Consequently the initial documentation was not maintained.

Extent

This condition is limited to the specific area reviewed by your inspector. SWEC standard practice, as reflected in Engineering Assurance Procedure 5.3, is to consider each issue of an analysis a completed record and includes appropriate requirements for maintaining them as such.

Corrective Action

Specific action to recreate the initial documentation is impossible at this time since the initial documentation has been integrated with the final documentation. No further corrective action is considered necessary since the final documentation is complete unto itself and reflects the as-built condition of the plant.

Preventive Action

Due to the unique circumstances involved in this situation and as the specific condition does not represent a significant condition adverse to quality no formal preventive action is proposed. However, SWEC concludes that had the initial documentation been maintained a more complete record would have been provided. We are confident that SWEC standard requirements and monitoring activities assure that this condition will not recur.

Response Item 2

Cause

The Form Z, referenced in the subject procedure was a special form (not required by SWEC standard documentation procedures) designed specifically for the reanalysis effort. The intended purpose of the form was to indicate completion of each reanalysis package in which is included all necessary pipe stress, support, penetration, and equipment calculations. Early in the reanalysis effort it was decided that use of the form was unnecessary as all calculations were being tracked, and their status documented by the appropriate review group. The use of the form was inadvertently left in the procedure.

Extent

We have reviewed the subject procedure and have determined that this condition is limited to the use of Form Z. All other requirements of the procedure have been implemented.

Corrective Action

The subject procedure has been revised to eliminate the requirement for the use of Form Z, thus providing a procedural record of the actual process as implemented.



Preventive Action

Due to the isolated nature of this item and in that our decision not to use the subject form does not reflect on the quality of the documentation, no preventive action is proposed.

Response Item 3Cause

The Engineering Assurance (EA) "Actions Item Tracking Log - EA Audits Projects" is a special log (not part of the EA standard audit program) that was established to track EA comments generated during the reanalysis effort. The EA involvement includes review of the initial documentation, submittal of EA comments to Project Engineering for resolution, and submittal back to EA by Project Engineering of documentation reflecting resolution of the comments. For the subject items, Project Engineering had not completed this process.

Extent

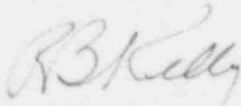
Review of EA audit records for all Projects that have completed I&E reanalysis programs indicates that this condition is limited to the specific items identified by your inspector.

Corrective Action

Project Engineering has completed the process described above including submittal of documentation to EA for 15 of the 17 items identified on the EA log. The 15 items are now closed and documented as such in EA records. Resolution of these items did not require any modifications to the plant. Work is proceeding to resolve the remaining 2 items which involve QA Category II equipment. It is presently anticipated that this effort will be completed by February 12, 1983.

Preventive Action

The SWEC standard corrective action program is described in Engineering Assurance Procedure 18.1. It requires resolution of all items identified by EA within 60 days of the date the item is reported unless additional time is specifically authorized by Engineering Management. This standard approach was not applied to EA's reviews of reanalysis work because EA was reviewing work in process rather than the normal practice of auditing completed work. In the future we will either implement our standard corrective action program or adopt a special program appropriate to the circumstances.



R.B. Kelly
Vice President, Quality Assurance

