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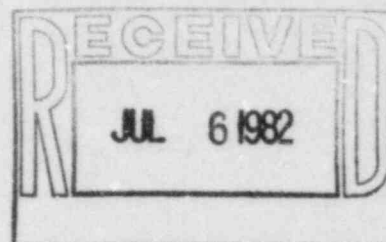
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June 30, 1982  
A773 - 82/01

U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011

Attention: Mr. Uldis Potapovs,  
Chief Vendor Programs Branch

Subject: Your Letter dated June 11, 1982  
Docket No. 99900513/82-01



Gentlemen:

The subject letter requests corrective and preventive measures to be taken by TES in response to nonconformance identified during the inspection conducted by Mr. D. F. Fox. This letter is submitted in response to that request and outlines TES action and scheduled completion dates.

The following responses are numbered as identified in Appendix A, Item B of the subject letter.

1. Contrary to the Criterion V of Appendix B to 10 CFR Part 50 and the Diablo Canyon Project Program Plan, QA records were not stored in a single record storage facility which meets the imposed requirements of ANSI/ASME NQA-1-1979, nor were the duplicate records stored in separate locations."

Committed Corrective Action

TES acknowledges this finding.

TES will provide on microfilm dual storage of records in a suitable location outside the TES office building.

In order to accomplish this effort, the workscope was divided into 3 different tasks, namely:

1. Categorization of the documents and merging of project documents in the file by utility/nuclear power plant;
2. Microfilming of these documents by category and document size;
3. Review of each film for legibility and acceptable hard copy reproduction, and preparation of the Microfilm Master Index.

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Scheduled Completion Date

1. This task was completed on May 20, 1982.
2. The Xerox Corporation, performing this task on TES premises, estimates the microfilming to be completed by September 15, 1982.
3. TES Document Control personnel are presently performing this task. A completion date cannot be scheduled at this time.

Committed Preventive Measures

As a preventive measure TES intends to microfilm on a daily basis the incoming and outgoing Q.A. records of new projects for separate storage. This microfilming will become an additional responsibility of TES Document Control after the backlog has been microfilmed by the Xerox Corporation. TES Personnel Relations Manager is in the process of recruiting a microfilm operator, as an addition to the present Document Control staff.

Scheduled Completion Date

A scheduled completion date of the preventive measure is not applicable.

"2. Contrary to Criterion V of Appendix B to 10 CFR Part 50 and section 3.0 of the QA Manual (QAM), design activities related to Mark I containment torus hydrodynamic analyses and design modifications for the J. A. Fitzpatrick, Millstone, Nine Mile Point, Pilgrim and Vermont Yankee Nuclear Power Plants were not being accomplished in accordance with the QAM. Specific examples of this nonconformance are:

- (a) Hydrodynamic analyses did not include sufficient referencing of source data, principles and assumptions to permit ready traceability as required by section 3.6.1 of the QAM. Further, the checker of hydrodynamic analyses did not perform the duties prescribed in section 3.6.2 of the QAM as required by section 3.6.1 of the QAM.
- (b) Calculations exhibiting the signatures of the originator, checker and the design verifier were not treated with the status of a QA record as required by section 3.6.3 of the QAM."

Committed Corrective Action

TES acknowledges this finding.

TES Project Manager, Mr. N.S. Celia, has taken the following corrective actions to resolve the deficiency:

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1. Documenting the engineering justification for using the static analysis method in lieu of the dynamic analysis technique;
2. Reviewing all affected calculations and adding references as required;
3. Documenting the sources of design inputs and assumptions in the calculation packages;
4. Reviewing all resulting design modification drawings and supporting stress calculations, including those previously transmitted to the affected plants, as needed;
5. Submitting completed calculation/analysis packages to the assigned Design Verifier for review, and subsequent submittal to Document Control as a QA record.

Furthermore, in an informal meeting the Project Manager has discussed with project analysts and checkers the need to include sufficient details as to purpose, method, assumptions, source data, equations, references, etc. in the calculation/analysis package to permit ready traceability of the work.

#### Scheduled Completion Date

Estimated date of completion of the above actions, including the performance of Design Verification, is August 31, 1982.

#### Committed Preventive Measures

In addition to making project personnel aware of the requirements of paragraph 3.6.3 of TES Q.A. Manual in the meeting held by Project Manager, the following action was taken as a preventive measure.

The Design Verifier has incorporated these items of concern as elements in the Verification Checklist. This checklist, included in the "Verification Procedure for the Mark I Pressure Suppression System, Plant Unique Analysis", is being used in the performance of the verification by the assigned Design Verifier.

#### Scheduled Completion Date

The above verification procedure as a preventive measure has been used in the verification process since June 7, 1982.



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- "3. Contrary to Criterion V of Appendix B to 10 CFR Part 50 and the Project Quality Assurance Program (PQAP) for the J. A. Fitzpatrick, Millstone, and Vermont Yankee Nuclear Power Plants, activities affecting quality regarding Design/Analysis Control, Project Personnel Assignment, and Project General (Engineering) Control were not accomplished in accordance with prescribed procedures in that the required procedures were either not imposed or not being implemented on the above projects."

Committed Corrective Action

TES acknowledges this finding.

Q.A. Manager's investigation has revealed that the Project Q.A. Program (PQAP) for Millstone, Vermont Yankee and Pilgrim contains a typographical error in the identification number of the engineering procedure, titled "General Control Procedure" (EP-1-XXX). For the worksite of each of the 5 nuclear power plants a "General Control Procedure" was prepared, and assigned an identification number, as follows:

EP-1-001 (J. A. Fitzpatrick)  
EP-1-002 (Millstone)  
EP-1-003 (Vermont Yankee)  
EP-1-004 (Pilgrim)  
EP-1-005 (Nine Mile Point)

Although the identification number, as referenced in the PQAP, is incorrect, these procedures have been implemented on the above projects.

With respect to TEP-1-003 "Design/Analysis Control", this procedure was in preparation concurrently with EP-1-001 through 005. It was anticipated that the procedure would be approved and issued at the same time or shortly after issue of these EP's. However, during the review and approval cycle of TEP-1-003 it was determined that the subject matter of TEP-1-003 could be more advantageously covered in other TEP's. TEP-1-003 was not issued.

Regarding TEP-8-008, "Project Personnel Qualification and Assignment", the status of this procedure after being initially issued as a TEP, was changed to a nonmandatory Engineering Instruction (EI) on 3/27/81 (i.e. after the issue of EP-1-001 through 1-005).

TES Q.A. Manager is of the opinion that non-invocation of TEP-1-003 and TEP-8-008 has had no effect on the quality of the work performed on these projects.

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The corrective action to resolve the nonconformances will consist of updating the PQAP's and EP-1-001 through 005 to reflect current references for the projects in question.

Scheduled Completion Date

The above actions will be completed by July 30, 1982.

Committed Preventive Measures

At the time of the issue of EP-1-001 through 005, TES was in the process of developing standard engineering procedures (TEP) for the Engineering Assurance Manual.

A more meticulous Q.A. review of the preparation of the PQAP's and EP's has helped to prevent recurrence of this type of deficiencies.

Scheduled Completion Date

A scheduled completion date of the preventive measures is not applicable.

"4. Contrary to Criterion V of Appendix B to 10 CFR Part 50 and the PQAP's for the Fermi 2, Millstone and Vermont Yankee projects, audits were not accomplished within the specified intervals, nor were they waived in accordance with the prescribed conditions and requirements."

Committed Corrective Action

TES acknowledges this finding.

As a corrective and preventive measure, TES Q.A. Manager has issued an internal memorandum dated 6/22/82, requesting QAE's to submit their scheduled audits on a weekly basis. Submittal of this weekly schedule will enable Q.A. Manager to reassign the performance of a scheduled audit in the event of potential conflicts or delays during that week. Conducting project audit within the specified intervals has now become a QAE team effort.

Scheduled Completion Date

Corrective action is a continuous effort and it is anticipated that restoration of and adherence to the audit schedule will evolve from these corrective and preventive measures.

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Committed Preventive Measures

These have been included in the Committed Corrective Action above.

Scheduled Completion Date

Reference Committed Corrective Action Completion date above.

- "5. Contrary to Criterion V of Appendix B to 10 CFR Part 50 and Section 17 of the QAM, PQAP's for eight projects contained a requirement to retain audit records for a period of 1 year, rather than for 6 years as required by the QAM."

Committed Corrective Action

TES Q.A. Manager disputes this finding.

TES Q.A. Manual, Section 17.0, Subsection 17.1, last sentence states:

"The classification of Owner Records normally expected to be generated by TES is shown in Figure 17.1 as abstracted from ANSI N45.2.9."

Subsection 17.2, Item b) states:

"Audit Reports require retention for six years and shall be maintained by or for the Client or Owner in accordance with the Project Q.A. Program."

The abstract in Figure 17.1 is considered to be a guide for the classification and retention of records in the preparation of the Project Q.A. Program (PQAP). Unless specified by contract TES has no responsibility for retention and storage of Owner records. Subsection 17.2 is intended to be the means for defining TES responsibility as regards Project Q.A. Record classification and retention. The PQAP is submitted to client's Q.A. and Technical interface for review and acceptance.

Q.A. Manager's interpretation is supported by the last paragraph of Subsection 17.3 which states:

"Unless otherwise stipulated by the Client, copies of all non-permanent records (i.e. Project Q.A. Records) shall be maintained by TES for a period not to exceed one year after completion of the project, at which time they may be destroyed".



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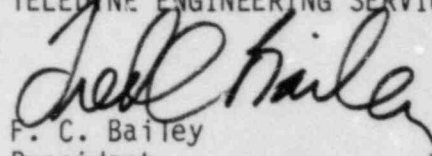
TES storage of Audit Records for 6 years after all other project documents have been discarded, serves no quality purpose.

No further action will be taken.

It is hoped that the foregoing is responsive to your findings.

Very truly yours,

TELEDYNE ENGINEERING SERVICES



F. C. Bailey  
President

FCB/cbw

cc: D.F. Landers  
A.E. Johnson, Jr.  
C.K. Combs  
C.G. Sprangers