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Public Service Electric and Gas Company 80 Park Plaza Newark, N.J. 07101 201/430-8316

August 19, 1982

Mr. R. C. Haynes, Administrator  
U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region I  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Dear Mr. Haynes:

NRC INSPECTION REPORT 50-354/82-07  
NO. 1 UNIT  
HOPE CREEK GENERATING STATION

Your letter dated July 22, 1982, transmitted the above referenced Inspection Report which contained a Notice of Violation citing three items of noncompliance. The following response is provided in accordance with the Notice of Violation.

- I. As of June 15, 1982, shear connectors installed on floor slab support beams supplied by Lakeside Bridge and Steel Co., under requirements of Specification C-151(O), were not bend tested in accordance with AWS D1.1 Code requirements. Additionally, Bechtel Supplier Quality failed to identify this problem prior to release of the beams for shipment.

Corrective Steps Taken and Results Achieved

On June 21, 1982, a hold on shipment was placed against the Lakeside P.O. 10855-C-151A(O)-AC and was maintained until review and approval of a Lakeside procedure for testing Nelson studs was completed by Bechtel. The Supplier Quality Representative at Lakeside withheld further shipments of structural steel with Nelson studs until they were tested in accordance with the approved procedure. Bechtel has satisfactorily performed bend test in accordance with AWS D1.1 on the structural steel previously shipped by Lakeside.

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Corrective Steps Taken to Preclude Recurrence

The Bechtel Procurement Quality Supplier Plan for C-151A(Q)-AC (Rev. 0 - dated 3/23/82) was amended on June 21, 1982, to require bend testing of Nelson studs per AWS D1.1 requirements and the supplier's approved procedure.

All other Purchase Order Quality Plans for structural steel, miscellaneous metal, and embeds were reviewed and found to contain appropriate instructions for the testing of Nelson studs.

Date of Full Compliance

Lakeside testing program in accordance with AWS D1.1 was implemented on June 22, 1982, and the testing of Nelson studs on previously supplied steel was completed on July 19, 1982.

- II. As of June 18, 1982, W-H quality control personnel were not qualified or certified in accordance with the requirements of NRC Generic Letter 81-01 or the W-H QA manual.

Corrective Steps Taken and Results Achieved

On June 18, 1982, all construction and inspection activities for safety related HVAC were stopped by issuance of Bechtel Stop Work Order No. 11. A detailed review of W-H Constructors' QC personnel qualification records for on-site personnel was performed. Criteria for the review included ANSI N 45.2.6 (1978), Regulatory Guide 1.58 and the W-H QA manual. It was found that all on-site Level II personnel met the education and experience criteria of ANSI N 45.2.6 and, therefore, were fully qualified to perform required inspections. It was determined that the Level III QC Supervisor did not have sufficient experience and education documented for a Level III certification. That individual was downgraded to a Level II and the Level III activities which he had performed were reviewed and recertified by a properly certified Level III. In performing the detailed review described above, administration errors noted in the individual certification packages were corrected by W-H Constructors. Upon verification of all required corrections, the Stop Work Order was lifted.

*when? - June 24*

On July 7, 1982, the certification packages for W-H Constructors' QC personnel at the Philadelphia, PA shop were reviewed. It was found that one Level II inspector did not have the education and experience required by ANSI N-45.2.6. That individual was immediately downgraded to Level I and the Level II activities which he had performed were re-verified and found acceptable by a properly certified Level II. No other discrepancies in certification of shop QC personnel were noted.

W-H presented and documented additional training and indoctrination sessions for their on-site and shop QC personnel during the period June 18 - 24, 1982.

#### Corrective Steps Taken to Prelude Recurrence

In the course of the review of QC personnel certification documentation, W-H's QA management was made more aware of the requirements of ANSI N-45.2.6 and their application in accordance with Regulatory Guide 1.58.

The certification documentation for W-H QC personnel hired in the future will be reviewed on an audit basis by the PSE&G group on site.

#### Date of Full Compliance

Indoctrination and training sessions were completed on June 24, 1982. Administrative errors in the certification packages were corrected by July 7, 1982. Re-verification and recertification activities referred to above were completed by July 7, 1982.

- III. As of June 23, 1982, excavation permits were not issued for expansion anchor bolt holes drilled to a depth in excess of 6 inches.

#### Corrective Steps Taken and Results Achieved

Bechtel has investigated all main concrete walls in "Q" areas (Reactor No. 1, Control, Diesel, and Rad-waste Buildings) where expansion anchor bolts were used for panel wall connectors and stair supports. No embedded pipe was found in the anchor bolt locations.

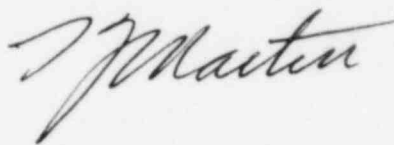
Corrective Steps Taken to Preclude Recurrence

On June 29, 1982, supervisory and Field Engineering personnel were directed to employ a mechanism to limit or gauge the drilling of expansion anchor holes. Acceptable mechanisms listed included stops, marking of bits, limited depth bits, etc. The drilling shall be controlled so that a hole depth equal to or greater than six inches will not be drilled. Also, in no case shall other than masonry bits be used for drilling expansion anchor holes unless investigated and approved by the responsible Field Engineer.

Date of Full Compliance

The date of full compliance was August 9, 1982.

Very truly yours,



CC: Office of Inspection and Enforcement  
Division of Reactor Construction - Inspection  
Washington D. C.

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