

# Parameter, Inc.

Consulting Engineers

13300 WATERTOWN PLANK ROAD, ELM GROVE, WISCONSIN 53122

Mechanical Design and Analysis

Since 1964

414-786-7580

June 21, 1982

U. S. Nuclear Regulatory Commission  
Division of Contracts  
Washington, D.C. 20555

Hand Carry to:

Room 2223, Air Rights III Building  
4550 Montgomery Avenue  
Bethesda, Maryland 20814

Attention: Mr. Kellogg V. Morton, Chief  
Research Contracts Branch  
Division of Contracts  
Office of Administration

Reference: USNRC-RFP: RS-OIE-82-249

PAR: Proposal NRC-IE-82/83

NRC Letter - June 17, 1982

Subject: Technical Assistance to Support  
NRC-IE Personnel in the Investi-  
gation of Incidents

Supplement to PARAMETER, Inc.

Proposal of April 2, 1982

Gentlemen:

Pursuant to the request of NRC Contracts Branch (telephone call, B. Bromberg, 6/15/82), this proposal supplement is being submitted. It is intended to reaffirm pricing data provided with our original Business Proposal, and to expand on our Technical Proposal with information responsive to questions posed by NRC in a facsimile memo received on 5/25/82. This information or answers to questions confirms that given NRC verbally in telephone conference of 5/28/82.

The content of the "Solicitation Package, RFP: RS-OIE-82-249" and the "Business Management and Cost Proposal" remain as submitted on April 2, 1982. Parameter, Inc. would like to be on record that, if a revised cost accounting system becomes a condition of receiving a contract, or becomes necessary at some future date in the course of an ongoing contract, it will be installed. Fee bases would then again be validated, and there would be no cost to the government.

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Questions posed in the 5/25/82 facsimile memo are repeated below together with our response:

"1. In Q/A-1, page 3, revision date 3/30/83 typo?"

This error in Q/A-1 has been corrected and other changes made in Rev. 4 which is resubmitted herewith as Attachment-I.

"2. In PQ/P-1, page 7, enter "Project Officer" instead of NRC contact Mr. (later)."

We have corrected the text of our prospective NRC Project Quality Plan(s), (PQP's) to designate the "Project Officer" as the NRC contact. This is in agreement with the proposed organization chart.

PQP-105, submitted with our proposal, was intended to present a general Project Quality Plan format. We have 'voided' this document and in its place are submitting with this supplement the following PQP's which present two different formats:

Attachment II - PQP-107, Rev. 0, 6/3/82

"Generalized Project Quality Plan (PQP)  
for Technical Assistance to Support  
NRC-IE Personnel in an Investigation  
Which Requires Design Review and/or  
Stress Analysis"

Attachment III - PQP-106, Rev. 0, 6/3/82

"Typical Project Quality Plan (PQP)  
for Providing Assistance and Services  
to Support NRC-IE Personnel in Inde-  
pendent Nondestructive Examinations at  
(To be Identified) Generation Station"

It is now our intention to prepare a Project Quality Plan (PQP-\_\_\_) for any task assigned. A typical plan format for design/analysis review task is shown in Attachment-II. A

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format for a typical NDE task at an unnamed plant is presented in Attachment-III.

Please note that Attachments-I, II, and III are submitted herewith for proposal purposes and are not intended as approval documents. In the event of award of a contract pursuant to this RFP to Parameter, Inc., we will submit Quality Documents formally, soliciting NRC comments, and make revisions accordingly. QP's will be tailored to specific tasks within the framework of an approved Q/A plan document.

- "3. Supplement available resources with personnel familiar with nuclear power plant operations that would be available under this contract."

Parameter, Inc. has obtained agreements with two engineering firms that have all around nuclear plant experience. They are

both being available for task assignments appropriate to their capabilities and experience. Information on each of the firms is contained in Attachments-IV and V.

The aforementioned sources are active in the nuclear industry, but have fewer clients than the large A/E's. Thus, the chance of conflict of interest on a given task is reduced, and of course will be evaluated on a case-by-case basis.

As the nature of any future nuclear plant operation investigation is unknown, it is not possible to propose the best individual or firm to respond ahead of time. In addition to the experience of its own staff in these areas, Parameter can consider other outside firms or individuals to best respond to a specific task assignment.

- "4. It is unclear how the QA program will generally function in controlling the various personnel/organizations outside Parameter. Provide clarification."

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Quality Assurance Program control over subcontract individual consultants and subcontractor organizations is applied through the Q/A-1 document (revised as necessary to interface with NRC's QA requirements). The control will be implemented in a narrow specific manner through the PQP written for the task, which will also be submitted to NRC for concurrence and/or approval. Acceptance of the quality controls is specified by our purchase order to the subcontract personnel/organization.

As an example of this control function applied to an Independent Nondestructive Examination task, see Attachment-III. In it we have used the [ ] organization as a candidate subcontractor on an unnamed plant NDE task. A review of our present QA records will show that the [ ] and personnel qualifications have been audited and all records are on file in Parameter's office. Some [ ] Q/A manual corrections and updating have been required and implemented.

For a prospective contract with NRC, we are prepared to make automatic distribution of QA documentation and correspondence on task assignments to OIE.

- "5. All 18 of the NRC's QA criteria are not addressed, for example, IX "Control of Special Processes" is not addressed and we normally consider NDE work to be in that category. Please review and revise the QA-1 document so a detailed QA review could be conducted by the NRC."

The PARAMETER, Inc. "Quality Assurance Program for Engineering, Analysis, and Testing" has been revised and is submitted herewith in the form of Rev. 4 as Attachment-I. NRC's observation as to the lack of a section controlling "Special Processes" is well taken. We agree that NDE work falls into this category and a section has been incorporated to cover this type of work. The title of Rev. 4 has also been revised to include "Testing".

Note that all 18 NRC QA criteria are now included in the Table of Contents of Rev. 4 of Program Q/A-1, Attachment-I. Also

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note that sections 9.0, 11.0, 14.0 and 15.0 in the text are identified as "Not Applicable to Program Q/A-1", because they do not pertain to our usual services as consulting engineers.

If tasks would come up requiring expansion of the program document to cover other criteria, changes and additions would be made. in the event of a contract the Q/A-1 document will again be revised to reflect foreseeable NRC task assignments and submitted for approval. Attachment-I in the context of the above comments is for proposal purposes only. Detailed QA review comments on Rev. 4 are invited.

- "6. Your proposal indicates certain sub-contractors such as testing laboratories and individual consultants who may be expected to engage in contractual relationship with the nuclear industry. Please describe your organization's policy and administrative steps that will be taken to avoid conflict of interest issues in the event of contract award."

Before considering the placement of an order pursuant to a task assignment with a subcontractor, we enter into verbal discussions relative to conflict of interest, (or appearance thereof), with him. If questionable conflicts arise, we would ask for NRC guidance in the matter. Lacking any question of conflict whatever, a purchase order is prepared for the subcontractor who has had prior approval of NRC for the given task. The purchase order attaches and incorporates the NRC Conflict of Interest, 41 CFR - Part 20-1 - General. The purchase order also specifies that acceptance of the order certifies that no conflict of interest exists as defined by the aforementioned document.

Copies of subcontract documents are kept available for review. NRC will have access to these files and the subcontractor directly to verify our non-conflict determination and/or make further investigations or clarifications. For a prospective contract we intend to prepare a separate "Determination of Non-Conflict of Interest" task document which will be filed routinely with the designated NRC contact(s). The format of this determination will be submitted to NRC for comments before using under a prospective contract.

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"7. Please discuss the individuals you recommend to supplement your staff in the civil engineering and concrete areas."

Supplementing those subcontract consultant capabilities listed in the original Technical Proposal, we have established additional expertise in the civil engineering concrete/structural area.

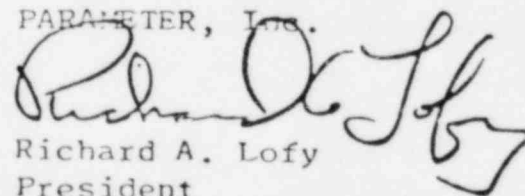


Other specialists can of course be contacted dictated by specific task requirements when they become known.

We trust this supplement is responsive to NRC's needs for further evaluation of our proposal. If anything else is required, please do not hesitate to call.

Very truly yours,

PARAMETER, Inc.



Richard A. Lofy  
President

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Enclosures:

- Attachment-I - Quality Assurance Program, Q/A-1
  - Attachment-II - Generalized Project Quality Plan, PQP-107
  - Attachment-III - Typical Project Quality Plan, PQP-106
  - Attachment-IV
  - Attachment-V
  - Attachment-VI
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