

SEP 07 1983

United Engineers and Constructors, Inc.  
ATTN: Mr. R. A. Curnane  
Vice President, Project Support Operations  
30 South 17th Street  
Philadelphia, Pennsylvania 19101

Gentlemen:

This refers to the inspection conducted by Mr. D. D. Chamberlain of this office on July 18-23 and August 1-5, 1983, of your facilities at Seabrook, New Hampshire, and Philadelphia, Pennsylvania, and to the discussions of our findings with Mr. J. B. Silverwood and members of your staff at the conclusion of the inspection.

This inspection included a review of your field design activities at the Seabrook site (interface between site design group and home office design groups) and special inspections in the following areas as a result of regional requests: (1) review of the UE&C Engineering Assurance Program, and (2) review of two 10 CFR Part 21 reports pertaining to deficiencies in the structural design of concrete walls for the cooling tower and the service water/circulating water pump house structures.

Areas examined during this inspection and our findings are discussed in the enclosed report. Within these areas, the inspection consisted of an examination of procedures and representative records, interviews with personnel, and observations by the inspector.

During this inspection it was found that you failed to meet certain NRC requirements. The specific findings and references to the pertinent requirements are identified in the enclosures to this letter.

Please provide us within 30 days from the date of this letter a written statement containing: (1) a description of steps that have been or will be taken to correct these items; (2) a description of steps that have been or will be taken to prevent recurrence; and (3) the dates your corrective actions and preventive measures were or will be completed. Consideration may be given to extending your response time for good cause shown.

We believe the nonconformances identified in Appendix A are indicative of a relaxation of quality requirements and are an invitation to abusive use of field changes. Previous time constraints on the processing of field changes provided some confidence that errors in changes would be promptly identified (e.g., in 1982, changes were required to be processed in 10 days, in 1983,

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RSS  
DDChamberlain/1k  
9/2/83

SC:RSS  
CJHale  
9/2/83

BC:VPB  
UPotapovs  
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D:VATP  
RLBangart  
9/10/83

this was changed to 30 days), but currently there are no such time constraints, only goals. We have discussed our concerns with NRC Region I and they agree that there appears to be problems associated with this entire process. In connection with your evaluation and response to these nonconformances, we suggest you consider additional methods to be imposed that will provide assurance that field changes are thoroughly controlled and that objective safeguards against the system's abuse be instituted.

The response requested by this letter is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Room. If this report contains any information that you believe to be exempt from disclosure under 10 CFR 9.5(a)(4), it is necessary that you (a) notify this office by telephone within 10 days from the date of this letter of your intention to file a request for withholding; and (b) submit within 25 days from the date of this letter a written application to this office to withhold such information. If your receipt of this letter has been delayed such that less than 7 days are available for your review, please notify this office promptly so that a new due date may be established. Consistent with Section 2.790(b)(1), any such application must be accompanied by an affidavit executed by the owner of the information which identifies the document or part sought to be withheld, and which contains a full statement of the reasons on the basis which it is claimed that the information should be withheld from public disclosure. This section further requires the statement to address with specificity the considerations listed in 10 CFR 2.790(b)(4). The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified periods noted above, the report will be placed in the Public Document Room.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

Original Signed By:

Uldis Potapovs

Uldis Potapovs, Chief  
Vendor Program Branch

Enclosures:

1. Appendix A - Notice of Nonconformance
2. Appendix B - Inspection Report No. 99900510/83-02
3. Appendix C - Inspection Data Sheets (18 pages)

United Engineers and  
Constructors, Inc.

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bcc:  
JTCollins, RIV  
RLBangart, RIV  
JEGagliardo, RIV  
TFWesterman, RIV  
MIS Section (J. Perry)  
VPB Branch Chief  
VPB Section Chiefs  
VPB Inspector  
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