



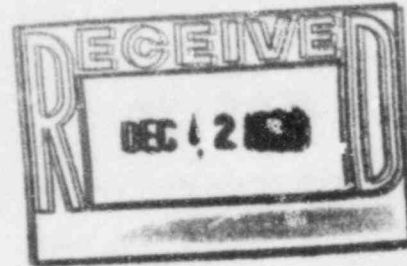
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December 7, 1983

W3K83-1922
Q-3-A35.02.01

Mr. Eric Johnson, Chief
Reactor Projects Branch 1, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012



SUBJECT: Waterford 3 SES
USNRC Inspection Report 50-382/83-17

Dear Mr. Johnson:

In accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, the following supplemental information regarding the Notice of Violation identified in Inspection Report 50-382-/83-17 dated June 6, 1983 is hereby submitted:

VIOLATION 1

1. "Failure to Provide Required Safety-Related Records in Accordance With Established Procedures"

10 CFR 50, Appendix B, Criterion V, states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

- a. Ebasco Services, Inc. (Ebasco) Specification 860-75, "QA Requirements for Suppliers of Safety-Related Equipment and Services," paragraph 4.17, QA Records, states, in part, "Sufficient records shall be prepared as work is performed to furnish documentary evidence of the quality of items and of activities affecting quality. . . . The records shall include the results of reviews, inspections, tests, audits, monitoring or work performance Required records shall be identifiable and retrievable. . . ."

American Bridge Procedure 23, Revision B, October 4, 1979, "QA Documentation Turnover," paragraph 6.4.1, states, in part, "Implementation of this procedure shall be initiated in adequate time before completion of site activities to permit Ebasco's review and determination of acceptability of records. . . ."

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Contrary to the above, Ebasco failed to provide complete QA records from American Bridge. Specifically, Ebasco failed to provide adequate QA documentation for the erection of structural steel for the missile protection over the east and west main steam isolation valves.

RESPONSE

The following supplemental information is provided for Violation 1.a.

Corrective Action Taken and Results Achieved:

Ebasco stated in their response that the work being done was being accomplished by Ebasco Force Account. Therefore, the lack of documentation was the lack of records from Ebasco Services. Welding discrepancies associated with the work that was being performed were reported on MCR-W3-4374 with subsequent completion and closure of the nonconformance report and retraining of Ebasco Force Account personnel being completed on July 19, 1983. The corrective action as stated is correct. However, the violation was against lack of American Bridge documentation not lack of records concerning work that was being performed by Ebasco Services. The lack of documentation for work performed by American Bridge was reported on SCD No.78 which encompassed the review of records pertaining to all structural steel installed by American Bridge at Waterford 3. The record review revealed insufficient documentation for structural steel welding and bolting. As a result of the review, reinspection of American Bridge installations was initiated. Noted deficiencies which require rework are presently being performed by Ebasco Force Account. Closure of above referenced SCD No. 78 is anticipated for December 22, 1983.

Corrective Steps Which Will Be Taken To Avoid Further Violation:

Any additional work will be performed by Ebasco Force Account. Ebasco has an approved program which will prevent recurrence of the reported deficiency. In addition, periodic monitoring will be performed to assure that Ebasco continues to be in compliance with their program.

Date When Full Compliance Will Be Achieved:

December 22, 1983

Yours very truly,


T. F. Gerrets
Quality Assurance Manager

TFG/WJB/JC

cc: E. L. Blake, W. M. Stevenson, G. L. Constable