

RSB

JUN 25 1984

Docket Nos. 50-528, 50-529 and 50-530

Arizona Public Service Company  
P. O. Box 21666  
Phoenix, Arizona 85036

Attention: Mr. E. E. Van Brunt, Jr.  
Vice President, Nuclear

Gentlemen:

Thank you for your letter dated June 15, 1984, informing us of your program for trending craft rework which we requested in our letter dated May 25, 1984. Your program will be verified during a future inspection.

Sincerely,

*TS*

T. W. Bishop, Director  
Division of Reactor Safety  
and Projects

cc:

- J. Bynum, Plant Superintendent
- S. R. Frost, Supervisor  
Nuclear Operations Licensing, Station 4080
- T. D. Shriver, Manager  
Quality Systems & Engineering

bcc: RSB/Document Control Desk (RIDS)  
w/letter dated June 15, 1984

File Reference: Inspection Report 50-528/84-04

JBM

- A. C. Gehr, Esq.  
Resident Inspector
- Joan Zollicoffer
- Ms. Jill Morrison
- Lynne Bernabei, GAP

RV *PN*  
P.Narbut:dh  
6/22/84

*NY*  
T.Young  
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*TWB for*  
T.Bishop  
6/22/84

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*1201*

Arizona Public Service Company

June 15, 1984  
ANPP-29759-TDS/TRB

U. S. Nuclear Regulatory Commission  
Region V  
Creekside Oaks Office Park  
1450 Maria Lane - Suite 210  
Walnut Creek, CA 94596-5368

Attention: Mr. T. W. Bishop, Director  
Division of Resident  
Reactor Projects and Engineering Programs

Subject: Request for Additional Assessment of an NRC Concern  
File: 84-019-026; D.4.33.2

Reference: (1) NRC letter to Mr. E. E. Van Brunt, Jr., dated May 25, 1984

This letter refers to the request for our assessment of the issue identified in the referenced letter, received by APS on May 29, 1984, concerning the perceived lack of focus toward quality work performed by craftsmen. This issue was originally raised in paragraph 2.s of the NRC's letter to E. E. Van Brunt, dated March 7, 1984.

Our assessment is enclosed in Attachment A.

Very truly yours,

*E. E. Van Brunt*

E. E. Van Brunt, Jr.  
APS Vice President  
Nuclear Production  
ANPP Project Director

EEVB/TRB:ru

Attachment

cc: See Page Two

*JWP  
8406250265*

Mr. T. W. Bishop  
ANPP-29759  
Page Two

cc: Richard DeYoung, Director  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

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ATTACHMENT A

REQUEST FOR ASSESSMENT

". . . your response to the quality assurance questions in paragraph 2.6 does not fully address our concern that the focus of quality should be that the work is performed correctly, the first time, by the craftsmen. The practice of using rework tags, and allowing incomplete work without trending or corrective feedback to the first line personnel (craftsmen and field engineering) does not encourage improved performance by these individuals. Accordingly you are requested to assess this aspect of your program and provide us with the results of your assessment, including a description of any actions you intend to take . . ."

RESPONSE TO REQUEST FOR ASSESSMENT

The project is and has been concerned with first time excellence. This is achieved through the use of the Construction Quality Control's tracking and reporting program and the Quality Talk program. These programs are both designed to achieve first time excellence in work performance. The QC tracking program is directed toward Field Engineering effectiveness during inspections and the Quality Talk program emphasizes quality work at all levels of the organization, i. e., manual and non-manual. In addition, these programs provide a trending function through Quality Control tracking and, of course, feedback is provided through the review of acceptance/inspection information directly with the Field Engineers and to all craftsmen via the Quality Talk program.

The NRC's original comment that ". . . first time excellence isn't demanded of the craft and Field Engineering personnel . . ." did not take into account the inspections that these individuals perform. It is a construction practice that the crafts inspect their own work, with subsequent inspections by Field Engineers. The Field Engineer's inspections attempt to identify and correct all problems prior to QC inspection.

Effective, February 6, 1984, Construction Quality Control implemented a tracking and reporting program to determine the Field Engineer's effectiveness during these inspections. This tracking and reporting program is accomplished in accordance with Quality Control Administrative Instruction No. 2.

Under this program, details of unacceptable installations are collected by Quality Control Engineers during their acceptance inspections. This information is forwarded to the Project Quality Control Engineer's (PQCE) office on a daily basis. The reports are reviewed and charted as to the acceptance/rejection rate by discipline. All acceptance/rejection information is forwarded to the responsible Unit Superintendent identifying the numbers of items that were not accepted. The number count is extracted from Incomplete Items Lists (IIL) and Nonconformance Reports (NCR) generated during the acceptance inspection.

RESPONSE TO REQUEST FOR ASSESSMENT

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The results of this acceptance/rejection information is monitored daily by the Project Quality Control engineer and reviewed twice monthly with the Project Construction Manager for applicable corrective action.

In addition to the above, the Project Construction Manager implemented a "Quality Talk" program, effective February 7, 1984, that requires the participation of all construction and subcontract personnel (about 900 manual and 2000 non-manual).

Approximately 190 "Quality Talk" meetings are conducted each Tuesday using a published agenda providing a forum for quality related matters to be discussed. Examples of items may include current Nonconformances and how to avoid similar problems, technical information regarding specification or procedural changes or general information such as workmanship and professionalism.

Old business is discussed which provides feedback on questions or comments raised in prior sessions. New business allows for the dissemination of specific information and discussion of concerns raised among the attendees. The meetings are recorded for review by supervision and management. Information found common to other groups is passed along and any comments or questions raised are identified to supervision for a response. Responses may be addressed in writing for the next session or may be given in person where long and complicated answers are required. Initial indications are that the "Quality Talk" program is being well received and taken seriously among crafts and non-manuals. Review of a sampling of the "Quality Meeting Minutes" indicates some of the types of situations that might lead to errors in first time construction are being questioned and clarified during these sessions.

Supplementing the "Quality Talk" program is a project wide display of quality themes on signs and posters. All these activities affirm management's commitment to quality workmanship. Our assessment is that the results of these programs are positive and that project personnel are conscious of the importance for performing their work correctly the first time.