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SUBJECT: Responds to Generic Ltr 81-01 re qualification of insp, exam, testing & audit personnel. Positions on Reg Guide 1.58 & Reg Guide 1.146 provided.

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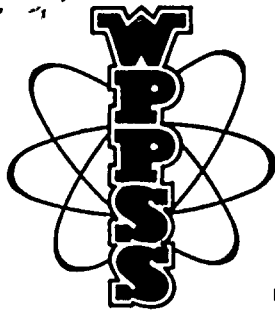
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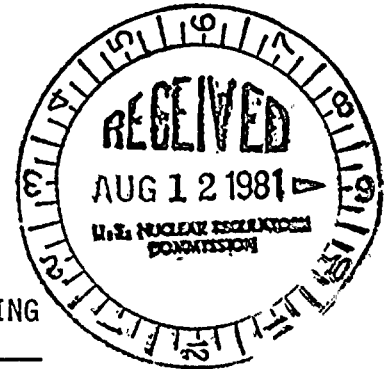
August 5, 1981

QA-81-64

Mr. D. G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Eisenhut:

Subject: QUALIFICATION OF INSPECTION, EXAMINATION, AND TESTING
AND AUDIT PERSONNEL (GENERIC LETTER 81-01)



- Reference: 1) Generic Letter 81-01, dated May 4, 1981, from Mr. D.G. Eisenhut to All Licensees of Operating Plants and Holders of Construction Permits, same subject.
2) Letter QA-81-43, dated May 6, 1981, from G.D. Bouchee to W.P. Haass, Subject: Operational QA Program Description (WPPSS-QA-004).

In response to Reference 1), the Supply System positions on Regulatory Guides 1.58 and 1.146 are as follows:

I. Regulatory Guide 1.58, Rev. 1 (September 1980)

A. Design & Construction Phase

WNP-1/4

The requirements of Regulatory Guide 1.58, Revision 0 and ANSI N45.2.6-1973 were not imposed on prepurchased equipment suppliers for WNP-1/4.

The requirements of Regulatory Guide 1.58, Revision 0 and ANSI N45.2.6-1973 are being implemented by the WNP-1/4 site construction contractors. As a result, regulatory positions C.5, 6, 7, and 10 of Regulatory Guide 1.58, Revision 1 are not directly imposed. The Supply System is currently complying with regulatory position C.8. The following are being implemented at WNP-1/4 and provide an alternate method of complying with the intent of the Regulatory Guide.

- C.5. After inspection, examination and test procedures are approved by the contractor's organization, these procedures are required to be submitted to the Architect Engineer (AE) for review and approval prior to implementation. The AE's Engineering and/or QA organizations review the contractor's procedures for technical compliance with the PSAR, technical specification, codes and

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A. Design & Construction Phase (cont)

WNP-1/4 (cont)

standards referenced therein, and for inclusion of adequate quality requirements to assure that the procedures are adequate to accomplish the objective.

- C.6. The construction contractors are required to identify to the Owner/Engineer the names of QA/QC personnel as they are qualified. The acceptability of the qualifications are randomly verified during the performance of monthly surveillances of the applicable contractors. In addition a monthly review is conducted of all remaining qualifications issued during the month which were not verified during the surveillance activities. Acceptability of an inspector's qualification is based on education, related experience, on-the-job-training, classroom training and documented proficiency testing. Points are assigned for each of these areas and a minimum number of points is required to qualify for each level of capability.
- C.7. During the construction of WNP-1/4, inspections are performed on an individual item basis; therefore, the use of a "team or group" of personnel not meeting the requirement of the standard for data taking assignments is not probable. Also, since the inspectors at WNP-1/4 are unionized, it is required that inspections be performed during construction by union inspectors. As noted in C.6. above, QA/QC personnel qualifications are verified for compliance with the requirements of ANSI N45.2.6-1973.
- C.10. If an individual does not meet the minimum requirements of the position that person is being qualified for, objective evidence must be available to demonstrate that the individual does have competence comparable to that which would be gained from having the required education and experience. See C.6. position.

WNP-2

The requirements of Regulatory Guide 1.58, Revision 0 and ANSI N45.2.6-1973 were not imposed on prepurchased equipment suppliers for WNP-2. As of November 1980, WNP-2 complies with Regulatory Guide 1.58 - September 1980 via the following alternate approach.

Prior to issuance of Revision 1 of this Regulatory Guide, personnel performing quality-related activities were provided indoctrination and training in the requirements of the applicable Quality Assurance program, procedures, instructions, and drawings affecting their work. Documented evidence of the above training was maintained. The indoctrination and training complied with the requirements of 10CFR Part 50, Appendix B and ANSI N45.2.

A. Design & Construction Phase (cont)

WNP-2 (cont)

As of November 1980, in addition to the indoctrination and training requirements noted above, requirements which meet this Regulatory Guide were imposed on site contractors for personnel performing inspections, examinations and tests. These requirements specify that initial evaluations of education, experience and qualifications are to be performed and documented; however, formal certificates are not required to be issued because specific inspections, examinations and tests are performed in accordance with approved procedures. Therefore, specific capability identification and levels of certification are not required. Burns & Roe is committed to the above approach.

Bechtel construction personnel who perform inspection, examination and testing are certified in accordance with ANSI/ASME N45.2.6-1978 and Regulatory Guide 1.58, Revision 0.

General Electric (NSSS) endorses Regulatory Guide 1.58, Revision 1, except that "not all GE personnel who approve inspection and test procedures will be certified as meeting Level III capability requirements, however, personnel who approve inspection and test procedures will be determined by GE management through evaluation of their education, training and experience to be fully qualified and competent. The basis for determination will be documented".

WNP-3/5

The Supply System will direct Ebasco to review those contracts which subscribe to ANSI N45.2.6-1978 and to direct those contractors to include the provisions of the regulatory positions stated in Regulatory Guide 1.58, Revision 1 with exceptions noted herein.

The requirements of Regulatory Guide 1.58, Revision 0, and ANSI N45.2.6-1973, were not imposed on prepurchased equipment suppliers for WNP-3/5.

The requirements of Regulatory Guide 1.58, Revision 0, and ANSI N45.2.6-1973 are being implemented by the Architect Engineer (AE)/Construction Management Organization (CMO). For the AE/CMO and those site construction contractors which subscribe to ANSI N45.2.6-1973, regulatory positions C.5, 6, 7, and 10 of Regulatory Guide 1.58, Revision 1 are not imposed. The Supply System and AE/CMO comply with regulatory position C.8.

A. Design & Construction Phase (cont)

WNP-3/5 (cont)

For contractors subscribing to ANSI N45.2.6-1978, the following alternative methods for complying with Regulatory Guide 1.58 requirements will be implemented:

- C.5. Inspection, examination and test procedures are approved by the contractor's organization and submitted to the AE/CMO for review and approval prior to implementation. The AE's Engineering and QA organizations, when applicable, review the contractor procedures for technical compliance with the specifications, codes and standards referenced therein, and for inclusion of adequate quality requirements to assure that procedures are adequate to accomplish the objective.
- C.6. The construction contracts require the contractor to submit procedures for qualification of personnel for AE approval prior to starting work. These procedures are subject to the review described in C.5 above, audited in a readiness evaluation prior to start of work, and individual qualifications are periodically reviewed in scheduled audits and surveillances.
- C.10. As noted in C.5 and 6 above, the qualification of personnel are subject to approved procedures and periodic audit and surveillance. Determination of initial capability and evaluation of job performance is outlined in these procedures.

Supply System personnel performing inspections, examinations and tests during fabrication, receipt at the construction site and construction, comply with the requirements of the regulatory positions of Regulatory Guide 1.58, Revision 1 and ANSI N45.2.6-1978.

B. Initial Test & Operations Phase

WNP-1/2/3/4/5

For WNP-2, the Supply System will comply with its position described in Appendix Section II.1 of the Operational QA Program Description (WPPSS-QA-004), Revision 5, transmitted to the NRC vide Reference 2). For WNP-1/4 and WNP-3/5, the Supply System will follow a position similar to that for WNP-2 and will be included in Appendix Sections II.2 and II.3 of WPPSS-QA-004.

II. Position on Regulatory Guide 1.146 & ANSI N45.2.23-1978

A. Design & Construction Phase

WNP-1/4

The requirements of Regulatory Guide 1.146 have not been imposed on the construction contractors at WNP-1/4. However, site contractors are required to have approved procedures which describe how personnel will be qualified to perform Quality Assurance Program audits. These procedures meet the intent of ANSI N45.2.23.

As the Construction Management Organization (CMO), Bechtel Power Corporation is responsible to perform audits of the site contracts with the exception of ASME Division 2 contractors. Bechtel Quality Assurance personnel performing audits of site contractors are qualified in accordance with the requirements of Regulatory Guide 1.146 - August 1980 and ANSI N45.2.23-1978.

Supply System Project QA personnel are qualified to the requirements of the Supply System Corporate QA Instruction which complies with Regulatory Guide 1.146.

UE&C performs audits of ASME Division 2 contractors and prepurchased equipment suppliers. UE&C auditors are qualified to the requirements of Regulatory Guide 1.146.

WNP-2

The Supply System at WNP-2 satisfies ANSI N45.2.23-1978.

Bechtel Nuclear Quality Assurance Manual commits to ANSI N45.2.23-1978.

General Electric is not committed to this Regulatory Guide, but instead states in its procedure number NED0-11209-04A, Revision 2, dated October 1980, that ----"The NEBG instructions required that QA audits be conducted using pre-established written procedures or checklists by appropriately trained personnel not having direct responsibility in the areas being audited".

Burns & Roe is not committed to this Regulatory Guide, but does endorse ANSI N45.2.23-1978.

Site contractors are not committed to this Regulatory Guide, but do maintain their audit programs in accordance with 10CFR50, Appendix B.

WNP-3/5

Regulatory Guide 1.146 is acceptable in its entirety.

Mr. D. G. Eisenhower
Qualification of Inspection, Examination, and
Testing and Audit Personnel (Generic Letter 81-01)
Page 6

B. Initial Test & Operations Phase

For WNP-1/2/3/4/5, the Supply System will implement the provisions of Regulatory Guide 1.146 (August 1980) and the requirements in the endorsed standard ANSI N45.2.23-1978 for initial test and operations phase activities.

Very truly yours,



G. D. Bouchey
Director, Nuclear Safety

