

**Washington Public Power Supply System**

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April 18, 1983

G02-83-339

Docket No. 50-397

Mr. John B. Martin  
Regional Administrator  
Nuclear Regulatory Commission, Region V  
1450 Maria Lane, Suite 210  
Walnut Creek, California 94596

Subject: WPPSS NUCLEAR PROJECT NO. 2  
SUMMARY OF COMMITMENTS MADE IN RESPONSE TO 10CFR50.54(f)

- Reference: 1) Letter EA-80-20, V. Stello, Jr., USNRC, to N. O. Strand, WPPSS, Subject: 10CFR50.54(f) Request Regarding Quality Assurance, dated 6/17/80
- 2) Letter G02-80-153, N. O. Strand, WPPSS, to V. Stello, Jr., USNRC, Subject: Notice of Violation and Additional Information-10CFR50.54(f), dated 7/17/80
- 3) Letter, V. Stello, Jr., USNRC, to R. L. Ferguson, WPPSS, Subject: Acknowledgement of letter G02-80-153, dated 9/17/80

The purpose of this letter and its enclosure is to provide a summary review of the actions taken by the Supply System to assure the quality of safety-related construction and to meet commitments made to the Commission in Reference 2. Basically, these actions were included in two major programs, Restart and Quality Verification.

The Restart Program consisted of three task forces:

Task Force One performed an initial review of the outstanding backlog of problems at that time and recommended specific corrective actions.

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Task Force Two comprised two phases:

- Phase one accomplished a review of procedures and work controls in order to assure on-going construction work would be performed properly.
- Phase two reviewed and reinspected work already in place at that time. Because of the enormity of this part of our review, this phase spun off as the Quality Verification Program.

Task Force Three reviewed management systems and made recommendations for improvements to those systems in place at the time. Except for verification of past construction work, these task force efforts were completed with the restart of safety-related construction by mid-1981, with the provision that new work would not preclude reinspection of work accomplished prior to the stopwork.

The Quality Verification Program (QVP) continues at this time, and is nearly 90% complete. This program has accomplished a review of records and/or hardware for seventy contracts, ranging from earthwork and building construction, through equipment procurement and installation, to systems completion and preparation for turnover.

An enclosure entitled, "Commitment Summary" is provided here with for your information and use in comparing our originally-stated plans with the responding actions of the QVP and Restart Programs. Where it has been necessary to deviate from our original plans, an attempt was made to clearly identify these variances in this summary. Fully detailed accounts of review activities are being made available on site, in our final reports of the work.

Please contact me if you have any questions on this matter.

*C. S. Carlisle*  
C. S. Carlisle  
Program Director, WNP-2

ENCLOSURE

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COMMITMENT SUMMARY<sup>1</sup>

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Washington Public Power Supply System  
Letter No. G02-80-153, 7/17/80

(In Response to USNRC Letter No. EA-80-153, 6/17/80, 10CFR 50.54(f) Request)

COMMITMENT STATEMENTS

Phase I - Short Term

- o Management resources have been allocated to three Task Forces to develop plans to a) expedite resolution of outstanding problem backlog at WNP-2, b) verify adequacy of prior work, and c) assure the management systems used to control continuing work are adequate.

DISCUSSION

a) Task Force I - Problem Backlog:

Plans for reducing the backlog of problems were initially outlined in Letter G02-80-259 to Region V, 11/12/80. Activities to carry out the plans have varied as necessary to respond to ongoing Project developments. Project instructions were issued for specific actions to be accomplished by participants.

b) Task Force II - Reverification:

This Task Force effort was separated into two phases:

Task Force II, Phase I - The Restart Program reviewed procedures to assure that work could be resumed with confidence that past problems would not recur.

Task Force II, Phase II - The Quality Verification Program was initiated in June 1981 to verify work completed prior to June, 1980. Reviews and reinspections were carried out through 1982. Results are now being analyzed.

<sup>1</sup> Supersedes the "COMPARISON" of commitments to Quality Verification Program activities, dated July 1982.

- o Each Task Force has been directed to review standards of performance and detailed controls for work methods. Recommendations for improvements will be a principal output of the Task Force efforts.
- o A requirement for approval by the Assistant Director of Technology prior to resumption of installation activities was placed on the WNP-2 major mechanical contract on June 19 pending additional owner evaluation of work methods, controls, and establishment of standards of performance. Key personnel were assigned to perform the evaluation.

c) Task Force III - Management System Improvements:

Management system improvements were addressed during the restart period. Measures to assure adequate management controls would be in place were initially outlined in Letter G02-80-259. These were further revised and improved by a new Construction Management Contractor being engaged in 1981 to carry out completion of the Project. The mechanical contract work was assumed by a new Systems Completion Contractor.

Controls for work methods were checked as a part of the Restart procedures reviews, in accordance with project instructions developed for that purpose. The actual reduction of backlogs of problems provides evidence that recommended improvements were carried out.

This commitment was revised to require Program Director approval (IOM F-80-5928, 11/30/80) instead of the Assistant Director of Technology. Prior to each contractor's restart of construction, the activities leading to restart were reviewed by Task Force personnel, Project Quality Assurance, and in some cases, an independent review by corporate personnel was performed. Restart occurred on a commodity basis prior to unconditional release of the contractor's work. Shortly thereafter, however, the mechanical work was placed in the scope of WNP-2's Systems Completion Contractor.

- o A plan has been established to perform summary evaluations of other contractors' current work controls at WNP-2 to reassure ourselves that quality controls are effective and that resumption of work following the current labor related work stoppage would have minimal risk of quality problems and would not preclude inspection of past work.

Accordingly, on July 17, we directed all contractors doing safety-significant installation work at the site to stop work until these reviews are completed.

### Phase II - Intermediate

This phase will last until January 1, 1981, and will include:

- o Completion of all reviews of safety-related hardware and records associated with those cases where past quality problems occurred and in those cases where timely review is essential to integrate with the startup sequence or is essential for timely evaluation of management controls. The overall review plan is given in Attachment 1.
- o The results from the above reviews will be applied to our evaluation of management controls, and any necessary changes will be made to WNP-2 in this phase.
- o Reinspection was performed during ongoing construction, but its schedule was integrated with the system startup sequence. Verification reinspections were completed in each system prior to turnover.

Review of work controls for contractors performing safety-related construction work at WNP-2 was accomplished by the Task Forces associated with the Restart Program.

These contractors were individually released to resume construction by approval of the Program Director following satisfactory completion of reviews and corrective actions. Actual restarts were accomplished in early 1981.

These intermediate-term commitments were not met on the schedule originally anticipated. It became apparent early in the Restart activities that, to perform a thorough review of prior work, even in only those areas where past problems occurred, it would be necessary to separate the Task Force II review actions into two phases: Restart and Reverification. It was decided that work could be resumed, provided new installations did not prevent access to previously-installed hardware for reinspection. It was necessary to complete the evaluation of management controls prior to restarting construction, but this was done without applying results of hardware reinspections. Sufficient knowledge was acquired from the review of procedures and control methods to resume work with confidence that the management improvements made would result in quality construction. The Restart activities were actually completed in June, 1981, and the Quality Verification Program activities are scheduled to be complete in July, 1983.

### Phase III - Continuing

- o The reviews of safety-related hardware and records will be completed in this phase and knowledge gained in reviewing past work at WNP-2 will be applied to evaluations of management control systems at all projects.
  
- o Further changes will be made in construction management systems which increase Owner awareness of contractor and subcontractor activities. Where necessary, Owner personnel will be resident with contractors for a sufficient time to evaluate work methods and quality controls. Additionally, certain contractor procedures are being individually analyzed and necessary improvements will be made. These actions will improve working level communication with the Owner and will permit more timely action to resolve problems.
  
- o It is recognized that the resolution of outstanding concerns and problems at WNP-2 requires additional resources, more management involvement, improved performance standards, and improved tracking systems designed to inform project management of deviations from performance standards and require timely resolution and followup. Detailed recommendations will be made by the Task Forces.

These reviews are now (4/83) being completed and the results evaluated. During the course of all review actions, including those accomplished prior to resuming construction, knowledge acquired was disseminated to other Supply System Projects for use in evaluating management controls. This was accomplished through a corporate-administered "Lessons Learned" Program.

Owner representatives were placed in residence with some of the contractors during the Restart Program reviews. However, the methods for completing construction at WNP-2 had been altered by engaging a highly-experienced Construction Manager early in 1981. All work is being accomplished under Bechtel Power Corporation's Quality Assurance Program.

Contractor procedures used in the ongoing work after restart were reviewed and improved by the Restart Program task forces. Very close direct review and approval of contractors' management plans for resuming and continuing work were required prior to release for restart.

Task Force I reviewed the overall status of outstanding project issues and made recommendations that backlogs of Requests for Information, Project Engineering Directives, Non-conformance Reports, Corrective Action Requests, 50.55(e)'s, and NRC Inspection Items be reduced and management controls be established to minimize future backlogs. Performance standards have been established for deficiency reports, and backlog status is tracked for all items and reported in the Program Director's Report.

- o The quality assurance program will be augmented by more project, construction, and engineering management awareness and involvement in resolution of quality problems.

In both the intermediate and continuing phases, the following conditions will apply:

- o Reports on these contract-by-contract reviews will be prepared and given to the NRC Resident Inspector, and forwarded to Region V every two months until completion.
- o Repairs or further action on identified deficiencies will be reported in accordance with 10CFR50.55(e) and Part 21. Deficiencies not meeting these criteria will be in the periodic reporting and available for review by the Resident Inspector.
- o In addition to the contract-by-contract review presented in the schedule associated with the 50.54(f) response, we have provided a model of our strengthened system verification process, which provides further assurance of the acceptability of components and structures integrated into a system.

In conclusion, I reiterate that our corporate energy is dedicated to compliance with law, our public responsibility for nuclear safety and the need to resolve these issues on a rigorous schedule.

In addition to the normal management interfaces on the Project, a Monthly Program Director's Review is conducted to keep management informed and involved in significant problem issues. The review format requires participation by the Quality Assurance Department.

Bimonthly Reports have been provided to NRC, Region V until 9/82. With NRC concurrence, the frequency of reporting was revised to quarterly.

The Project has adhered to this commitment throughout the course of the Restart Program and Quality Verification Program as evident from the reports.

The verification process was rearranged when the Quality Verification Program (QVP) was prepared. Logic and flow diagrams are used in the QVP description to illustrate program activities and to depict the interrelated elements of the plans.

As presented to the NRC in regular progress reports since the June 1980 Stopwork, the Project has fulfilled these obligations in the past and continues to do so in its ongoing activities. Enormous resources have been dedicated to sample reinspections by all Project participants, in order to determine the adequacy of safety-related work accomplished prior to the stopwork.



The management improvements made on this Project have been designed to assure that the continuing construction is accomplished in accordance with required quality standards.

————— (End of Cover Letter) —————

The following is a "comparison" of commitments of the plan submitted as Attachment 1 with the activities accomplished (or under way) by the Supply System in its Restart and Quality Verification Programs. This attachment embodies the 50.54(f) Commitments. Subsequent attachments, also listed hereafter with a brief description of the contents, do not record commitments, per se. Rather, they provide a snapshot of activities under way or envisioned at the time of the response letter.

Revisions to the information in the Attachment 1 comparison subsequent to a July, 1982 version (submitted to the NRC with Bimonthly Progress Report No. 11) are indicated by vertical lines in the right-hand margin.

### Commitment Statements

### Discussion

#### A. Summary

This program describes the plan the Supply System will implement for the review and/or reinspection of completed safety work to determine the adequacy of documentation, installation and hardware. Also, included is a schedule for the review of contractors, subcontractors and prepurchased equipment contractors.

A general description of activities accomplished by the Supply System to review and reinspect completed safety-related work, and therefore comply with the provisions of this plan, is presented here. Although there are no basic deviations from the objectives and policies of this plan, changes from specific provisions have occurred.

Because some intermediate-term commitments were not met on the schedule originally planned, and because the amount of review associated with past work was greater than anticipated, another schedule was presented in the Quality Verification Program (QVP) document, QVI-01, Section 6.0. This schedule was not periodically updated because there are several contributing schedules involved in planning the work of the QVP, each of which was updated as necessary during the course of work.

## B. Objectives

The objectives of this program are to:

- o Determine whether the quality assurance program was adequate in the past to assure completed safety-related work was properly performed.
- o Identify need for repairs or further action.
- o Apply knowledge gained to the review of QA programs at other Supply System Nuclear Projects.

The Restart Program and Independent Review Team reviewed on-site contractor quality programs and that activity resulted in improvements to those programs. The QVP, while not specifically directed toward assessment of those programs, is dedicated to determining the adequacy of work completed by the contractors prior to the stopwork. The acceptability of that work will provide a relevant demonstration of the ability of past Quality Assurance Programs to confirm that safety-related work was performed properly.

Deficiency-review results and problems identified during Restart were used to plan QVP reinspections (reference: Generic Problem Areas List). NCRs or other appropriate non-conformance and corrective-action directives have been written for deficiencies encountered in the QVP.

Applicable knowledge has been disseminated through the corporate-administered Lessons Learned Program. This process will continue as appropriate through QVP completion.

## C. Policies

The review and/or inspection of safety-related work at WNP-2 will be accomplished in accordance with the following policies:

- o Review of records, installation and hardware will be accomplished under Owner direction and control.

The QVP, like Restart before it, is a Supply System program. It is directed by the Supply System with participation by personnel in all site organizations. Project instructions provided management direction for all activities.

- o Review shall be integrated with on-going work plans and management systems to assure proper priority, feed back to ongoing work, and to adjust the review response to knowledge acquired.

- o This program will have priority over ongoing work. The project construction work pace will be adjusted accordingly.

- o The basis for key decisions will be documented.

#### D. Program Description

The basic elements of the review and/or reinspection program are described below:

1. Identify all contractors, subcontractors and prepurchased equipment contractors performing safety-related work, the status of their work and the status of final documentation review.

Project direction had been given to participating organizations requiring verification of systems to be complete before turnover to the Supply System. Program activities were carefully scheduled to precede any construction milestones which would deny reinspection access.

Program instructions identify considerations to be given for an increase in inspection samples when negative reinspection results are acquired.

The decision to resume construction prior to completing reinspection changed the perception of this commitment. Verification of hardware in each system by sample reinspection before system turnover is a requirement identified in the the Project's Master Work List control system. This policy assures that past work was neither covered by new work nor overlooked.

QVP logic is documented in various program instructions. Specific decisions impacting the work of project participants are issued by letter from the WNP-2 Program Director or Construction Manager.

This was initially accomplished in the Restart Program. The list of closed contracts has been reviewed and amended during the course of QVP, as identified in regular progress reports. This list now includes thirteen more contracts than originally planned.

2. The review and/or reinspection program will be accomplished by using the following process. The attached logic diagram depicts the program.

2.1 Determine the criticality and priority of items for review and/or reinspection.

2.1.1 Evaluate the significance of the safety function, complexity of construction, time period of construction or fabrication activity, assessment, and trending of deficiency documentation, and discussions with selected crafts and quality control personnel.

The process for review and reinspection of past work was rearranged as described in Program instructions. The revised implementation process is more compatible with project activities and still assures that the proper reviews and reinspections are performed.

This determination was not made in the same manner described in the original examples given in the other attachments to the Supply System's 50.54(f)-response letter. All QC-I/SC-I hardware items, furnished or installed by seventy contracts, were considered to be candidates for reinspection in the QVP, and reinspection priority was determined by the system turnover schedule.

As the review effort on prepurchase and inactive contracts draws to a close, the Supply System is initiating a special review of hardware furnished or installed by these contracts to determine if there are critical components which should be reinspected, regardless of other program reviews which indicate otherwise. Procedures and documentation for these components are also covered by this review.

Some of these considerations were made during Restart and in QVP. However, determination of hardware reinspections were more dependent upon results of the documentation review. Trends of deficiency documentation established during Restart reviews, along with other identified concerns, were compiled into a Generic Problem Areas List, which was used in the development of reverification plans. Discussions were not held with craft personnel, but were held with QA, QC, and Field Engineering personnel to aid in determining past problems.

2.1.2 Identify all contractors with critical work remaining. These contractors will be the first priority for review. . .

2.1.3 Identify and evaluate all contractors with any work remaining which could limit access for reinspection of completed critical work.

2.2 Determine whether other inspection or evaluation programs have satisfied or will satisfy the requirements of this program. These inspections or evaluations will be referred to Engineering for a documented evaluation of compliance with reinspection objectives. Quality Assurance and Management will review and approve results.

2.3 Record Review - A review of a significant number of quality records for critical items shall be performed.

Accomplished in the Restart Program. For QVP, however, emphasis on systems completion had more properly prioritized reviews and reinspections in the field in conjunction with system turnover.

Scheduling of reinspection activities was accomplished by system priority as stated above, not by contractor or commodity. For the randomly selected reinspections performed by the QVP, no such selected sample of prior work has been identified as having been covered by new work accomplished since Restart.

In the QVP, credit is taken for inspections performed by other programs only if they were appropriate and were conducted with sufficient independence to be objective. These programs are reviewed in accordance with established guidelines and the results documented (Ref. QVI-05). There are a number of such programs which have reviewed work that was already in place at the time of the stopwork.

QC-1/SC-1 hardware comprises the candidate population for review and reinspection (these were considered to be the "critical items"). As identified in the model diagram sent along with the 50.54(f)-response letter, a 10% sample of the QC-I/SC-I hardware and records was to be reviewed. In much of the work, 100% of the documentation was reviewed.

### 2.3.1 Quality and Work Procedures.

- o Verify that procedures incorporate applicable requirements from the SAR, specification, code, and standards.

Accomplished for current site contractor procedures by the Restart Program. Procedures for contracts already closed were not reviewed for technical adequacy, but were reviewed to determine that appropriate engineering approval had been obtained. In certain instances in the Special Tasks element of QVP, inactive-contract procedures were reviewed to ascertain appropriate document control measures were in place. Further, a special effort, briefly outlined in Section 2.1, will address technical adequacy of procedures for closed contracts.

- o Verify that procedures were approved by appropriate approval authorities.

Accomplished in QVP review of inactive contracts, and Restart review of active contracts.

- o Verify that welding and special procedures were qualified.

Accomplished in QVP review of inactive contracts, and Restart review of active contracts.

### 2.3.2 Review personnel (welding/NDE/QC/Engineering) qualifications to determine whether they were qualified.

Welding, NDE, and QC Inspectors' qualifications are covered by document reviews described in Sections 3.1 and 4.1 of the QVP. The techniques described in Section 5.2 provide positive information on engineering qualifications by demonstrating individual performance, and are more valuable than less direct methods, such as verification of resume statements and the like. This review is not intended to be a resume search.

### 2.3.3 Review deficiency reports (NCRs, CARs, IRs, RFIs, etc.) for the following:

- o Significance of backlog on quality aspects. Accomplished by Task Force I, Deficiency Reviews.
  - o Quality of disposition as written. Covered on a sample basis by the Special Tasks element of the QVP: Deficiency Document Review.
  - o Quality of disposition as implemented. Covered on a sample basis by the reinspections of the Systems Completion element of the QVP.
- 2.3.4 Review selected sample of work packages for:
- o Completion of all required inspections. Covered by QVP, Section 3.0 for active contracts, and Section 4.0 for inactive contracts. In some cases, more than a sample are reviewed: 100% of Contract 215 (active) and all inactive contractors' quality documentation were reviewed.
  - o Use of proper forms.
  - o Completeness of package.
  - o Adequacy of review by contractor personnel.
- 2.3.5 If significant problems are identified, escalation of Records Reviews will be applied as shown in the logic diagram.
- 2.4 Receipt Inspection - Evaluation of Site Contractor receipt inspection programs will be conducted.
- The diagram is not a specific part of the QVP. Appropriate consideration is given to escalation of inspections/reviews in all parts of the Program as outlined in Section 5.1.
- No specific actions are directed to assessing the contractors' past programs, as this is not considered useful. Reinspections of the mechanical contractor's stored ASME material, and reinspection of owner-furnished, prepurchased material in storage was performed prior to use in the plant. Previously installed material was reinspected as a part of the Systems Completion and Prepurchase and Inactive Contracts elements of the QVP, and this included appropriate receiving-inspection attributes. Vendor drawings and information were utilized as appropriate for these and other inspection points. Deficiencies identified during reinspection of installed material, although pos-



2.4.1 Critical Items received by the contractor will be identified.

2.4.2 Contractor's documented receiving inspection programs will be reviewed for adequacy. This review shall include the following considerations:

- o Inclusion of PSAR and Specification Requirements.
- o Receiving Inspection personnel qualifications.
- o Use of drawings, vendor data and/or vendor specifications.
- o Review of deficiencies identified subsequent to receipt inspection to determine if they should have been documented at receipt inspection.

sibly receiving-inspection-related, are resolved within the project's corrective action process, and no specific action will be taken to identify their source.

For the purpose of this program, critical items are basically defined as QC-I or QCII/SC-I.

Active contractor procedures for receiving inspection were reviewed in the Restart Program for inclusion of FSAR and specification requirements. Results of these reviews are being considered in QVP review of receiving inspection activities.

Receiving inspection personnel qualifications were checked prior to restart of construction. Earlier personnel will not be checked because only general requirements existed prior to restart, and verification is not considered useful. A more valuable method was the reinspection of stored material to verify that it meets project requirements, which indicates whether past inspections were satisfactory.

Relevant information provided by the vendor is utilized in performing verification reinspections of stored and installed hardware.

This will not be done. It would provide indirect information which is inconclusive because of the difficulty in determining if discovered deficiencies existed at the time of receiving inspection. Further, the reviews, inspections, and tests performed by the project in this and other programs are directed to verifying the in-place end product.

2.4.3 If the receiving inspection program is judged to not be adequate, a significant sample of installed hardware shall be reinspected.

The Quality Verification Program provided a complete reinspection of the mechanical contractor's critical items which had a potential for installation in the plant, to verify correct initial receiving inspection. With minor exceptions, the material was found satisfactory. The Supply System initiated a complete reinspection of owner-furnished materials in their custody. For hardware already installed, a 10% sample was reinspected to determine its acceptability.

2.4.4 If the receipt inspection program is judged adequate, a smaller sample of reinspection shall be accomplished.

Covered in 2.4.3.

2.4.5 Significant problems identified during the reinspection program shall result in a progressively larger sample size.

For prepurchased material in storage, 100% was reinspected. For the mechanical contractor's ASME material in storage, 100% was reinspected. For previously installed material, the Quality Verification Program analyzes the nature and number of deficiencies discovered in the reinspection process to determine appropriate increases in sampling.

2.5 Installation Reinspections - Installation Reinspections not covered by the reviews performed in 2.2 shall be accomplished as follows.

Installation reinspections are accomplished by the Quality Verification Program.

2.5.1 Critical work activities within the contractor's scope of work shall be identified. Critical work and activities are determined as identified in Section 2.1.

Covered in Section 2.1.

2.5.2 A significant sample of work activities will be selected for reinspection.

Basically, ten percent of the QC-I/SC-I items in the plant which are not covered by other inspection or evaluation programs are reinspected on a systems basis. The reinspections are repeat final visual inspections of the hardware.

2.5.3 Reinspection shall independently verify adequacy of the activity, as well as the accuracy of the associated records.

2.5.4 If significant problems are found in the installation, a progressively larger sample will be reinspected.

2.6 Deficiencies - Deficiencies identified during the performance of record review, reinspection of installations and received material shall be documented.

2.6.1 An analysis of the number and types of deficiencies identified shall be performed to determine the root cause of the problem and appropriate corrective action initiated. Relevant information will be communicated to all projects.

2.6.2 Deficiencies meeting the requirements of 10CFR50.55(e) and/or Part 21 shall be reported to the NRC in accordance with approved procedures. Others shall be summarized in the bimonthly report to the NRC Region V Office.

QC instructions have been provided to cover the reinspection activities and review of quality records. The instructions require that independence of the inspectors be maintained.

The QVP analyzes the nature and number of deficiencies discovered in the reinspection process to determine appropriate increases in sampling.

Deficiencies are recorded on Inspection Reports and Nonconformance Reports. The deficiencies are described and the corresponding deficiency-documents are identified in the final reports of the QVP.

Many deficiencies were identified and trended in the Restart Program, and subsequent management changes were made at WNP-2. The results of the analysis of these task force efforts were disseminated to all projects through the corporate-administered Lessons Learned Program. Likewise, the information on deficiency trends arising from the QVP are being communicated through that program.

Appropriate reporting to the NRC has been accomplished during the Restart and Quality Verification Programs. In addition, detailed reports of the reviews and re-inspections are being prepared to record the findings of the QVP, and will be published at the completion of the program.

#### ATTACHMENT 2 of 50.54(f)

##### Commitment Statements:

This attachment gives an example of the application of review criteria to Contract 216. It describes a rationale for selecting hardware for review.

#### ATTACHMENT 3 of 50.54(f)

##### Commitment Statements:

Attachment 3 is a description of the features, scopes, and functions of the three Supply System Task Forces established to respond to the 50.54(f) information request.

#### ATTACHMENT 4 of 50.54(f)

##### Commitment Statements:

Attachment 4 is an illustration of a Flow Diagram for a system verification process.

Basically all QC-I and SC-I hardware which has been completed, inspected, and accepted prior to July, 1980, are candidates for review in the QVP. Not all work will be sampled for reinspection; however, decisions for not reinspecting the work of a contract or a system will be documented in the reports of the reinspection programs.

Task Force activities have been or are being performed in accordance with the provisions of this attachment. Aside from the condition where much of the Task Force III activity was identified and performed within Task Force II, Phase I, there have been and there are no anticipated significant deviations from the provisions of the attachment.

There are no significant departures from elements illustrated. More detailed illustrations of the verification processes are included in the Quality Verification Program description.

ATTACHMENT 5 of 50.54(f)

Commitment Statements:

Attachment 5 specifically relates to then-near-term actions for Contract 215.

Except for some of the verification of past work, these issues were addressed in earlier activities, prior to the restart of construction. The past work is covered in the Quality Verification Program. The construction scope of Contract 215 was transferred to the Systems Completion Contractor.

ATTACHMENT 6 of 50.54(f)

Commitment Statements:

Attachment 6 described then-recent actions to strengthen management control of the Project.

This was a historical snapshot of management actions during the period preceding the cessation of work. The attachment contained no specific commitments pertaining to verification tasks. A number of these activities continue today.

