

Gibbs & Hill, Inc.

ENGINEERS DESIGNERS CONSTRUCTORS

50-584
DIRECT DIAL EXTENSION

(212) 760-5450

July 21, 1981

United States
Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. J. Spraul

Dear Mr. J. Spraul:

Per our telephone conversation on July 20, 1981, we are herewith submitting a copy of the proposed changes to Amendment 5 which describes procurement at our regional offices. Regarding your concern on QA we have also attached page 8 of subsection 17.1.1.4 which states that the QA Department is responsible for surveillance and auditing of procurement at all G&H offices. Thank you for your attention to this matter.

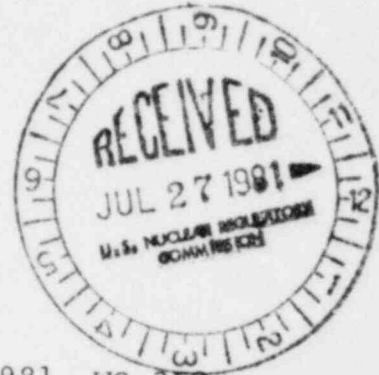
Very truly yours,

GIBBS & HILL, INC.

N.N. Keddis

N.N. Keddis
Manager, Quality Assurance

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Attachments



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personnel assigned to staff a particular project and work as a team under the administrative responsibility of a project manager.

All regional offices are headed by a Vice President-Manager Regional Office. These Vice Presidents-Managers report to the Senior Vice President-Regional Operations, who in turn reports to the Executive Vice President.

All nuclear safety-related engineering and design activities at the regional offices are headed by a Manager Nuclear Operations or a Manager of Engineering, who reports to the Vice President-Manager Regional Office. Project Managers, Chief Engineers and design personnel report to the Manager, Nuclear Operations or Manager of Engineering. Each of their departments supply technical personnel assigned to staff a particular project and work as a team under the administrative responsibility of a project manager.

New York office

~~The~~ Procurement Department is headed by the Manager Purchasing who reports to the Senior Vice President, New York Project Operations through the Assistant to the Senior Vice President.

The Manager Purchasing is responsible for the establishment and maintenance of a ^{corporate} list of approved bidders for nuclear safety-related items and services; coordinates preparation of the Instruction to Bidders and Terms and Conditions sections of the

procurement document; and administers all purchasing and expediting aspects related to procurement functions.

→ See Insert A

Construction activity within G&H is headed by the Senior Vice President, Construction who reports directly to the President. However, for quality assurance related matters, the Senior Vice President, Construction, is accountable to the Executive Vice President. This procedure is applicable to construction activities being performed as part of a G&H project.

The G&H Senior Vice President, Construction is also the President, of Dravo Utilities Constructors, Inc. (DUCI), a wholly-owned subsidiary of G&H. The G&H QA Manager also serves as the DUCI QA Manager, thus maintaining uniformity and control of the QA and Quality Control (QC) activities of both companies. DUCI performs QC activities related to vendor shop surveillance services and construction site functions as required by G&H. In performing these services DUCI utilizes and is governed by those approved programs and procedures developed by G&H. Although DUCI QC personnel report administratively to the DUCI Vice President, Administrative Services, who in turn reports to the President of DUCI, their technical direction comes from G&H QA. The DUCI organization is shown on Figure 17.1-2.

The Senior Vice President, New York Project Operations; Senior Vice President, Regional Operations; Vice President, Consulting Engineering, Quality Assurance and New Technology; and Senior

Insert "A"

Procurement activities in the regional offices are headed by a Manager Purchasing who is responsible to the Vice President-Manager Regional Office. The Managers Purchasing are responsible for coordinating preparation of Instructions to Bidders and Terms and conditions sections of the procurement document; administering all purchasing and expediting aspects related to procurement functions and coordinating with the Manager Purchasing, New York Office the establishment and maintenance of the corporate list of approved bidders for nuclear safety related items and services.

construction phases of at least one nuclear power plant. The organization of the QA Department is shown on Figure 17.1-4.

The QA Department has four main functional responsibilities:

- a. to establish and approve QA and QC requirements and criteria;
- b. to review engineering and design documents for procurement and construction to verify that all nuclear safety requirements have been incorporated;
- c. to provide surveillance of all QA activities in the New York and regional offices, during the engineering and design, procurement, and construction phases to determine that all on-line and specified independent design verification procedures and quality control procedures have, in fact been applied to all processes-engineering, design, procurement, manufacture, fabrication, assembly, construction, erection, installation, and preparation for startup; and that all activities have been properly documented, whether at G&H facilities or at facilities of suppliers, constructors, and their subcontractors (to the extent of G&H contractual obligations to the Utility Owner); and
- d. to audit at regular intervals, by examination and evaluation, the objective evidence provided by documentation accumulated internally and externally in the normal course of the processes involved and during surveillance activities at G&H offices, at the supplier's facilities, and at the nuclear plant site. Audits are performed by the G&H QA Department or by G&H Management, as applicable, in accordance with written procedures and checklists to verify compliance with