

## Washington Public Power Supply System

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Docket No. 50-508

December 6, 1982  
G03-82-1254

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U. S. Nuclear Regulatory Commission, Region V  
Office of Inspection and Enforcement  
1450 Maria Lane, Suite 260  
Walnut Creek, California 94596-5368

Attention: Mr. D. M. Sternberg  
Chief, Reactor Projects Branch No. 1

Subject: NUCLEAR PROJECT 3  
NRC INSPECTION AT WNP-3 IE REPORT  
NO. 50-508/82-16

Reference: a) Letter, G03-82-1199, R. S. Ieddick to D. M. Sternberg,  
same subject dated November 24, 1982.

The referenced letter comprised our response to the NRC inspections conducted in August, including the corrective/preventive actions taken regarding the items identified in IE Report No. 50-508/82-16. Attached is our supplementary response addressing Supply System management involvement and design control activities.

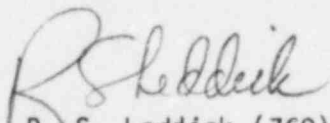
It is clearly our intent to increase our technical and quality involvement as the project approaches the transition from bulk construction to systems turnover. This increase is an outgrowth of the Technical Support Task Force study outlined in the Attachment.

The intended increase in Owner involvement is further evidenced by both recent and new management initiatives leading to increased Owner involvement. Such initiatives are in addition to continuation of ongoing Supply System engineering activities. These are primarily related to design and design change control by the Owner. They are not all inclusive, but illustrate up-front Owner involvement in the completion of the overall design and our efforts to minimize unnecessary turbulence in resolution of construction and safety related issues. The initiatives are outlined in the Attachment.

December 6, 1982  
G03-82-1254  
U. S. Nuclear Regulatory Commission, Region V  
Page 2

NRC INSPECTION AT WNP-3 IE REPORT NO. 50-508/82-16

We look forward to discussing these or other mutual areas of interest in greater detail on December 9, 1982.



R. S. Leddick (760)  
Program Director, WNP-3

OET:nj

Attachment

cc: J. Adams - NESCO  
D. Smithpeter - BPA  
Ebasco - New York  
WNP-3 Files - Richland

ATTACHMENT TO  
INCREASED LICENSEE LEVEL OF INVOLVEMENT

I. Recent Management Initiatives Leading to Increased Owner Involvement

- A. On March 18, 1982, we initiated an in-depth review of plant systems, structures and components for technical adequacy, operability, maintainability and for compliance with Supply System, Regulatory, Code and Standard requirements. It is our understanding that the scope of this review is much greater than normal in the industry. The review is progressing well and targeted for completion by June 1, 1983. Several system review packages have been completed and accepted by the Supply System.

The program provides the process by which Ebasco demonstrates that the design is adequate, and provides a documented record of that review process. It also provides a vehicle to establish a turn-over point for closure of the design whereby the Supply System can be assured that Ebasco's design work is complete and has been confirmed or substantiated through a system design review process. The program also identifies as appropriate specific items requiring concentrated followup review for engineering adequacy.

- B. On September 1, 1982, a "Technical Support Task Force" was formed to develop a plan to implement the orderly transition of technical personnel for WNP-3. This plan addresses the organizational transition through the design and construction, system startup and pre-operational testing, and operations phases of the WNP-3 plant and incorporates "lessons learned" from WNP-1 and WNP-2. The task force completed its report in October, 1982. Two resulting near-term actions are:

- 1) Establishing and staffing a WNP-3, On-Site Engineering organization (reporting to Corporate Technology) starting within four to six months.
- 2) Increasing the construction engineering activities of Project Engineering by increasing the staff dedicated to the function. A near-term goal is to establish technical overview of the field design change process and to identify functions that focus on trouble shooting engineering impacts on plant startup and operations.

- C. During the SALP reporting period seven significant audits of the design process were conducted, five of Ebasco and one each of Combustion Engineering and Chicago Bridge and Iron. Since the reporting period similar audits were performed covering GEA design of the ultimate heat sink (dry cooling tower internals), site design change control, and Ebasco, New York design. The latter was most significant in terms of depth and identification of needed corrective actions. Ebasco has been responsive in developing

the necessary corrective actions for resolving program deficiencies. A schedule for implementation of the corrective actions has been established. Additionally, an in-depth audit of ESSE was initiated in November, 1982, to determine whether ESSE working level procedures accurately reflect ESSE's activities and responsibilities regarding design control/design verification.

- D. The Supply System recognizes that potential impact to construction, quality, licensing, and cost and schedule exists with regard to future significant potential design changes stemming from TMI, code changes, etc. In order to ensure proper visibility and management of such impacts a Supply System team recently analyzed these issues. The resultant plan indicates the latest date that modifications would have to be completed to support the current PA dates; our planning illustrates where essential studies, decisions, design and procurement would have to commence.
- E. Prior to December 10, 1982, the Supply System will provide definitive direction to Ebasco which tightens the design "freeze" program. The program provides Owner control of design changes prior to and after provisional acceptance and into plant operation on a system-by-system basis.

## II. Current Management Actions to Expand Owner Involvement

- A. On November 24, 1982, the Program Director issued instructions to the Project Manager to establish two new programs to greatly expand the Owner's involvement in the NCR and field initiated design change processes. The intended purpose is to:
  - 1) Better assure that the in-place processes and procedures are adequate and are being followed and provide correction as necessary.
  - 2) Significantly strengthen the Owner's involvement in and control over this activity.
  - 3) Provide, in addition to other ongoing activities (e.g., as a member of the NCR Review Board) an additional means of gaining better understanding of the plant as designed and constructed.

The owner plans to review NCRs for proper disposition and follow up. NCRs processed after January 1, 1983, will be reviewed.

A review of field initiated design change documents will also begin starting in early December, 1982. Surveys will be conducted of QFPCPs, and field originated DCNs. Other information documents will be reviewed to confirm the scope of the documents do not constitute design changes.

A report of the above actions will be included in the Monthly Director's Report to insure proper management visibility and review.

These programs may be modified to reflect our experience and to improve their effectiveness.

B. Additional near-term increases in Owner involvement include:

- 1) Review of all future construction specification changes for licensing or FSAR impacts.
- 2) Future review of Ebasco's disposition of changes to contractor procedures for conformance to design requirements.

III. Continuation of Previous Owner Involvement Actions

It is emphasized that the activities listed in Sections I and II are in addition to the continuation of ongoing Owner engineering activities such as:

- 1) Licensing activities including FSAR review, revision and defense and processing of regulatory information.
- 2) Review and approval of all A/E specifications and associated amendments, bid evaluations, and contract change orders.
- 3) Review and approval of the Class IE equipment qualification program.
- 4) Coordination of the plant security system design.
- 5) Maintaining an active role in the CE owners group.
- 6) Assuring compliance with In-Service Inspection (Section XI) and ASME Section III requirements.
- 7) Review test and startup specifications and provisional acceptance requirements.
- 8) Review and approve Engineering Baseline.
- 9) Primary Owner responsibility for resolution of significant technical issues and followup of "Hot Line" allegations pertaining to engineering.