



TEO1 |||

SUMMARY OF RESPONSE TO S&W CIO REPORTSI. S&W OPEN ITEMS PRIOR TO JUNE 30, 1983 (S&W #11)

The following items remain open from previous letters:

1. Need to supply S&W with a copy of the NRC Commitment List

Response: An initial revision of the base NRC commitment list based on the June 10 CCP letter to NRC has been provided to the CIO. S&W letter dated July 25, 1983 (S&W #15) indicates this item as closed. Updates to the commitment will be provided to the CIO as they are made.

2. Need to take action on Roy A. Wells memo (Serial 22848) dated June 7 summarizing status of open items from the QVP management review.

Response: J. W. Cook letter to J. A. Rutgers, CPCo Serial 23624 dated July 13, 1983 acts on the recommendations made by R. A. Wells and concludes for the MRC (Management Review Committee) that all constraints to the QVP, other than NRC approval, have been closed.

3. Need to describe and present procedures on the NCR disposition process.

Response: The NCR disposition process to be used for the QVP is the normal process as described in PSP 3.2. A revised procedure (F2-M) for preparing and processing NCR's will become effective August 30, 1983.

NCR's generated from the hanger reinspection only will have an additional step to develop a recommended disposition prior to final disposition in accordance with the above procedures. These additional procedures will be made available to the CIO. The Nutech portion of the NCR process remains open until we provide the CIO with the process. The Nutech Process was developed for the hanger reinspection program and should not be a restraint to CCP (which includes the QVP). Project Engineering will discuss process with CIO.

II. JUNE 30, 1983 LETTER (S&W #11) - MANAGEMENT COMMITTEE REVIEW

1. CPCo should clearly establish their position on requirements for examination after team training.

Response: The project position is that supervisor evaluation of individual on-the-job performance will determine the qualifications of each individual. Examinations following training sessions will not be used. A separate program for evaluation of training content and instructor performance has been set up. The CIO has reviewed this program and reported it as closed in Report #5 dated July 18, 1983.

2. The review team should assemble their comments in one document and present their findings prior to the Management Review Committee Meeting.

Response: A similar request was made of the review team by the Chairman of the Management Review Committee. An effort will be made to schedule review team activity to allow time for preparation of a single summary document for future management reviews.

3. Restraints presented to the Management Review Committee should be resolved prior to the MRC meeting or the meeting delayed.

Response: The review team has been identifying their open items directly to the responsible organization element prior to the Management Review Committee meeting which allows for corrections or response on each item at the MRC meeting. This approach meets the needs of the MRC and will continue to be used for future management reviews in order to maintain needed management flexibility and prior notice in scheduling meetings.

### III. JULY 12, 1983 LETTER (S&W #12) REPORT #4

1. Page 2 of Report Item 3) - "Need to identify commitments made to NRC"

Response: This is a previous open item - It is closed as described in I.1 above.

2. Page 2 of Report - Item 4) - "CIO considers the list of commitments to the NRC a constraint to the QVP"

Response: This is a previous open item - It is described in I.1 above.

3. Page 2 of Report - Item 5) - "CIO concerns in the conduct of training of supervisory personnel"

Response: This item is closed in S&W Report #5 dated July 18, 1983 (Item 2, page 2).

4. Action Items from Page 2 of S&W #12

- 1) Resolve items on B M Palmer's memo - Serial 22897A dated 6-14-83

Response: This was a CIO Action Item and Report #5 (S&W #14) addresses the memo.

- 2) Need job descriptions and responsibilities of CPCo personnel engaged in QVP.

Response: The job descriptions have been reviewed and the item closed (S&W Report #5 dated July 18, 1983).

- 3) Has a program been developed to process non-conformances?

Response: The program to process non-conformances has been covered in I.3 above.

IV. JULY 14, 1983 LETTER (S&W #13) - OVERVIEW OF CCP

No response required

V. JULY 18, 1983 LETTER (S&W #14) - REPORT #5

1. Item 3)a page 2 "Adequacy of Drawing (A8) - large bore pipe hangers"

Response: Closed by S&W #15

2. Item 3)b page 4 "Additional verification of equipment received and installed (E2)"

Response: Even though S&W has closed this item relative to QVP, a separate program requirement is still open that would establish how to verify vendor equipment.

3. Item 3)c page 4 "Material traceability of installed hangers (E3)"

Response: The material traceability issue for hangers is open pending S&W review.

4. Page 5 of Report #5 - Item 4

Response: This item closed. Item 4.2) from Item III above (S&W #12 - Report #4)

Open Action Items - Listed on Page 5 of Report #5

- 1) Commitment List

Response: Closed as described in I.1 above

- 2) Commitment List

Response: Closed as described in I.1 above

- 3) Management Review Committee action in R. A. Wells memo

Response: Closed as described in I.2 above

CPCo Required Action

- 1) MRC to convene to confirm or modify recommendation of MPQAD

Response: Closed as described in I.2 above

## 2) NCR Process

Response: Current status described in I.3 above

VI. JULY 25, 1983 (S&W #15) Report #6Action Items

- 1) Concern - "Adequacy of drawings - Large Bore Pipe Hangers" - closed by this letter. New item opened. Advise CIO of redline NCR and its impact of QVP.

Response: The majority of the Field Redlines (FRL) in question affected pipe supports within the scope of the Hanger Reinspection Program. Approximately 5% of the FRLs affected small bore pipe drawings.

Immediately upon identification of the FRL problem, the necessary procedural controls were implemented by the affected organizations.

These controls include:

- 1) Project Engineering identifying which drawings are affected and placing them on hold in accordance with EDP 4.46.
- 2) Upon notification from Project Engineering, Field Document Control issues a drawing hold cover sheet to all affected organizations on drawing distribution. This action is in accordance with FPD-1.000 Rev 16.
- 3) Quality Control has issued an "activity hold" in accordance with AAPD/PSP G-3.2, preventing any inspections to a drawing with an outstanding FRL.

These programatic controls are sufficient to preclude inspection acceptance of affected items. In addition, all of the individual holds are forecasted to be released and revised drawings redistributed by 9-8-83. For this reason, the redline issue has no quality impact on the QVP.

- 2) Concern - "Material Traceability of Installed Hangers".

Response: Material traceability in general is the subject of a draft report completed by the MPQAD Principle Quality Advisor. Although this draft report recommends some changes for future work, it concludes that the Project does meet the applicable requirements. A memo from the Executive Manager - MPQAD to the Management Review Committee presents this conclusion.

Since the conclusion is that material traceability requirements are currently being met, there will be no impact on reinspections during QVP or the Hanger Reinspection Program.

- 3) Concern - Has a program been developed ... to process NCR's?

Response: Remains open as indicated in I(3) above.

Open Action Items

- 1) CPCo believes this is closed based on I.2 above

VII AUGUST 1, 1983 LETTER (S&W #16) Report #7 -

All identified action items have been addressed in Section VI above.

VIII SUMMARY OF OPEN ITEMS TO DATE

- 1) Develop vendor equipment verification program - (MPQAD/SMO).  
This is not a restraint to Phase I CCP activities but has been committed to resolve prior to Phase II.
- 2) Project Engineering to provide the CIO with procedures on the Nutech Process.