

Thomas J. Martin
Vice President
Engineering and Construction

Public Service Electric and Gas Company 80 Park Plaza Newark, N.J. 07101 201/430-8316

February 10, 1984

Dr. Thomas E. Murley, Administrator
U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Dr. Murley:

NRC INSPECTION REPORT 50-354/83-14
NO. 1 UNIT
HOPE CREEK GENERATING STATION

- I. Your letter dated January 10, 1984, transmitted the above referenced Inspection Report which contained a Notice of Violation citing one item of noncompliance. The following response is provided in accordance with the Notice of Violation regarding support plate eccentricity and Unistrut bolting.

A. Corrective Steps Taken and Results Achieved

As described in the subject NRC Inspection Report, Bechtel Power Corporation has issued Nonconformance Reports (NCR) Nos. 2569 and 2570 to document and control the identified deficiencies. In accordance with the disposition to NCR No. 2570, the affected spring nut was removed and properly installed. Rework of the two wall-mounted supports is in process in accordance with NCR No. 2569.

In addition, a reinspection of all safety-related electrical wall-mounted supports was performed to determine the extent of connections that exceed the design criteria for eccentricity. Fourteen Nonconformance Reports were prepared to document and control the discrepancies identified. Twelve of the NCRs were dispositioned as "use-as-is." The remaining two (NCR Nos. 2644 and 2695) are still under engineering evaluation.

8402 30014 R40307
PDR DOCK 05000354
G PDR

A sample reinspection was performed in the Reactor Building at elevation 102' and in the Diesel Generator Building at elevation 150' to determine the extent of the problem with improperly seated spring nuts. Of a total of 1,636 inspected, two were found to be cocked. Nonconformance Report Nos. 3061 and 3062 were prepared to document and control these discrepancies. In accordance with the NCR dispositions, the spring nuts were reworked to meet requirements.

Bechtel Engineering is currently evaluating the results of the sample inspection of spring nuts to determine if further inspection and/or corrective action is required.

B. Corrective Steps Which Will be Taken to Avoid Further Violations

A training session was held on September 29, 1983, for Electrical Quality Control Engineers on the application of drawing requirements to determine allowable eccentricity for wall-mounted supports. Further QC training was provided on December 20, 1983, to assure proper inspection of Unistrut bolting.

C. The Date When Full Compliance Will be Achieved

Rework in accordance with NCR No. 2569 will be completed by March 2, 1984.

Rework of electrical supports having eccentricity problems will be completed by May 15, 1984.

The evaluation of the results of the inspection of spring nuts will be completed by March 9, 1984.

II. Your letter also requested responses to four observations as described in Appendix B of the subject report. The following responses are accordingly provided:

A. Control of Rework

Unauthorized rework after QC acceptance has been the subject of trending analysis by Bechtel QA. In response to the trend, Bechtel's Project Superintendent has issued written instructions to supervisory personnel emphasizing the importance of proper

rework control. Additionally, training sessions were held for supervisory personnel on the program requirements for QC notification and authorization. These actions were accomplished by December 6, 1983.

Bechtel has initiated a program to investigate upon identification, any instance of work proceeding without proper authorization. Bechtel's Field Construction Manager will meet with the responsible individuals from the groups involved to determine the cause and provide corrective action.

On January 27, 1984, Bechtel's Manager of Field Construction met with key personnel from their Construction, QA and QC organizations to emphasize that further occurrences of the problem will not be tolerated and that strong disciplinary action would be pursued where appropriate.

Bechtel's efforts to improve communications between Construction and QC personnel included a series of working sessions to review the related procedures and make recommendations for improvement. Resultant procedural changes are expected to improve communications and to enhance the visibility of QC hold, witness and notification points.

B. Complexity of Drawing E-1406

Drawing E-1406 is being revised to clarify and simplify the design requirements. We anticipate issuance of the revised drawing by March 30, 1984.

C. QC Involvement in W-H Welder Qualification Program

On November 2, 1983, Bechtel's Project Construction QC Engineer issued Administrative Directive No. 23 requiring the monitoring of W-H's welder qualification activities on a surveillance basis. This is commensurate with the level of QC involvement with Bechtel's own welder qualification activities.

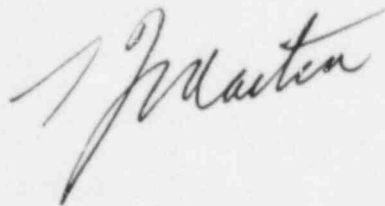
D. On-Site Visibility of Corporate Quality Assurance

A portion of the confusion surrounding this issue is attributable to the fact that at the time of the NRC Inspection, the procedures contained in Volumes 1 and 4 of the PSE&G Quality Assurance Manual had not

been revised to reflect the recent organization changes. This was identified in the subject report as an Inspector Follow-Up Item, IFI 50-354/33-14-01.

Since that time, these procedures were revised deleting any reference to the Corporate QA organization. Corporate QA has no functional responsibilities for the PSE&G Quality Assurance Program. Corporate QA's charter has been clarified to reflect management's intent that Corporate QA function solely as an in-house management tool. The charter states "... it (this assignment) is not intended to satisfy any regulatory requirements."

Very truly yours,



CC: Office of Inspection and Enforcement
Division of Reactor Construction Inspection
Washington, D.C.

NRC Resident Inspector - Hope Creek
P. O. Box 241
Hancocks Bridge, N.J. 08038