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ANPP-29759-TDS/TRB

U. S. Nuclear Regulatory Commission
Region V
Creekside Oaks Office Park
1450 Maria Lane - Suite 210
Walnut Creek, CA 94596-5368

Attention: Mr. T. W. Bishop, Director
Division of Resident
Reactor Projects and Engineering Programs

Subject: Request for Additional Assessment of an NRC Concern
File: 84-019-026; D.4.33.2

Reference: (1) NRC letter to Mr. E. E. Van Brunt, Jr., dated May 25, 1984

This letter refers to the request for our assessment of the issue identified in the referenced letter, received by APS on May 29, 1984, concerning the perceived lack of focus toward quality work performed by craftsmen. This issue was originally raised in paragraph 2.s of the NRC's letter to E. E. Van Brunt, dated March 7, 1984.

Our assessment is enclosed in Attachment A.

Very truly yours,

E. E. Van Brunt

E. E. Van Brunt, Jr.
APS Vice President
Nuclear Production
ANPP Project Director

EEVB/TRB:ru

Attachment

cc: See Page Two

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Mr. T. W. Bishop
ANPP-29759
Page Two

cc: Richard DeYoung, Director
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ATTACHMENT A

REQUEST FOR ASSESSMENT

" . . . your response to the quality assurance questions in paragraph 2.8 does not fully address our concern that the focus of quality should be that the work is performed correctly, the first time, by the craftsmen. The practice of using rework tags, and allowing incomplete work without trending or corrective feedback to the first line personnel (craftsmen and field engineering) does not encourage improved performance by these individuals. Accordingly you are requested to assess this aspect of your program and provide us with the results of your assessment, including a description of any actions you intend to take . . ."

RESPONSE TO REQUEST FOR ASSESSMENT

The project is and has been concerned with first time excellence. This is achieved through the use of the Construction Quality Control's tracking and reporting program and the Quality Talk program. These programs are both designed to achieve first time excellence in work performance. The QC tracking program is directed toward Field Engineering effectiveness during inspections and the Quality Talk program emphasizes quality work at all levels of the organization, i. e., manual and non-manual. In addition, these programs provide a trending function through Quality Control tracking and, of course, feedback is provided through the review of acceptance/inspection information directly with the Field Engineers and to all craftsmen via the Quality Talk program.

The NRC's original comment that " . . . first time excellence isn't demanded of the craft and Field Engineering personnel . . ." did not take into account the inspections that these individuals perform. It is a construction practice that the crafts inspect their own work, with subsequent inspections by Field Engineers. The Field Engineer's inspections attempt to identify and correct all problems prior to QC inspection.

Effective, February 6, 1984, Construction Quality Control implemented a tracking and reporting program to determine the Field Engineer's effectiveness during these inspections. This tracking and reporting program is accomplished in accordance with Quality Control Administrative Instruction No. 2.

Under this program, details of unacceptable installations are collected by Quality Control Engineers during their acceptance inspections. This information is forwarded to the Project Quality Control Engineer's (PQCE) office on a daily basis. The reports are reviewed and charted as to the acceptance/rejection rate by discipline. All acceptance/rejection information is forwarded to the responsible Unit Superintendent identifying the numbers of items that were not accepted. The number count is extracted from Incomplete Items Lists (IIL) and Nonconformance Reports (NCR) generated during the acceptance inspection.

RESPONSE TO REQUEST FOR ASSESSMENT
Page Two

The results of this acceptance/rejection information is monitored daily by the Project Quality Control engineer and reviewed twice monthly with the Project Construction Manager for applicable corrective action.

In addition to the above, the Project Construction Manager implemented a "Quality Talk" program, effective February 7, 1984, that requires the participation of all construction and subcontract personnel (about 900 manual and 2000 non-manual).

Approximately 190 "Quality Talk" meetings are conducted each Tuesday using a published agenda providing a forum for quality related matters to be discussed. Examples of items may include current Nonconformances and how to avoid similar problems, technical information regarding specification or procedural changes or general information such as workmanship and professionalism.

Old business is discussed which provides feedback on questions or comments raised in prior sessions. New business allows for the dissemination of specific information and discussion of concerns raised among the attendees. The meetings are recorded for review by supervision and management. Information found common to other groups is passed along and any comments or questions raised are identified to supervision for a response. Responses may be addressed in writing for the next session or may be given in person where long and complicated answers are required. Initial indications are that the "Quality Talk" program is being well received and taken seriously among crafts and non-manuals. Review of a sampling of the "Quality Meeting Minutes" indicates some of the types of situations that might lead to errors in first time construction are being questioned and clarified during these sessions.

Supplementing the "Quality Talk" program is a project wide display of quality themes on signs and posters. All these activities affirm management's commitment to quality workmanship. Our assessment is that the results of these programs are positive and that project personnel are conscious of the importance for performing their work correctly the first time.