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May 30, 1985

Mr. Gary G. Zech, Chief
U. S. Nuclear Regulatory Commission
Vendor Program Branch
Division of Quality Assurance, Vendor,
and Technical Training Center Programs
Office of Inspection and Enforcement
Washington, DC 20555

Dear Mr. Zech:

INSPECTION 99900510/84-02

Attached are our responses to the nonconformance identified in your letter dated May 3, 1985 concerning the subject inspection.

In addition, we are requesting you to review the status of UE&C's Topical Report (UEC-TR-001-6A) as referenced in NUREG-0040. We request that you issue a current triennial evaluation letter to UE&C.

Please advise if you have any questions concerning this matter.

Very truly yours,

M. Pai, Vice-President
Project Controls and Services

MP/TGM/mfc
Attachment

IE09
1/1

A. This nonconformance has two parts which must be addressed separately.

Part 1:

Requirement: Section 4.1.1 of United Engineers and Constructors (UE&C) Procedure 9763 A RM-1, Site Records Management System, Revision 5, dated April 13, 1984, states, in part, that if the records are to be considered valid "No white-out or correction tape shall be used. Corrections shall be accomplished by single line crossout, the corrector's initials and the date of correction."

Finding: Engineering Change Authorization (ECA) 05/1846A, dated November 26, 1983, has indications of whiting-out of a drawing on page 2 of 93.

Response: The RM-1 Procedure controls the "Turn in" of QA Records to the Seabrook Yankee Document Control Center. Microfilm or microfilmable copies are made from the original Engineering documents and turned in to the Seabrook Yankee Document Control Center. In order to assure clear and uncluttered Engineering Documents, it is UE&C's practice to allow the use of white-out and correction tape on Engineering Design Documents such as Drawings, Specifications, System Design Descriptions, and the supplementing pages of technical information attached to Engineering changes, (ECA's & DCN's). The use of word processors has reduced the need for these correction methods. The correction method of a line crossout and initials and date are used for Inspection Report and QA Documents which establish the quality of the hardware and are unique to the hardware.

Part 2:

Requirement: Section 4.2.1.5 of UE&C Administrative Procedure AP-15, "Project Design Changes," Revision 21, dated May 25, 1984, states, in part, "Changes shall be clearly identified by a vertical line to the right of the change."

Finding: Two (2) versions of Design Change Notice (DCN) 63/0065A issued. One had the approval box checked with no Project Engineering Manager signature and was dated June 22, 1983. The other was Approved by the Project Engineering Manager and dated July 11, 1983. The changes of this second version were not identified as required.

Response: The issuing and control of DCN's are in accordance with Administrative Procedure #10, Design Change Notice (DCN) and Budget and Expense Revision (BER) not AP-15. Paragraph 5.5.2 of AP-10 which addresses Revisions to DCN's/BER's does not require a line in the right hand column to indicate a revision. An Interim Procedure Change (IPC-1) has been issued to this procedure to require marking of revisions with a line in the right margin or clouding of the change.

The DCN is used to notify the engineering disciplines and Client of possible changes. No construction can be done with a DCN. The two versions in the Site Information file were the draft copy and the final signed off copy.

B. Requirement: Section 17.1.15.5 of the UE&C Topical Report UEC-TR-001-6A, dated September 16, 1982, states, in part, that "When applicable, the corrective action is described on the NCR, and implemented as described in Section 17.1.15 (Corrective Action) of this report.

Finding: Contrary to the above, Section QA-15, "Nonconforming Materials, Parts or Components," Revision 11, dated February 29, 1984, of the UE&C Quality Assurance Procedures Manual does not specify the requirement for describing the process corrective action on the Nonconformance Report (NCR).

Response: QA-15 has been revised in its entirety. Revision 12, dated 3/8/85, includes provisions for documenting on the NCR form those actions which were taken to correct the identified nonconformance. In addition, the procedure provides for a monthly trend analysis of NCRs to identify generic problems. The actions taken to preclude recurrence of generic problems are described in QA-16.

C. Requirement: Section IV.C.9 of Quality Assurance Procedure QA-15, "Nonconforming Materials, Parts or Components" Revision 11, dated February 29, 1984, states, in part, "The NRB (Nonconformance Review Board) is comprised of representatives from: ....4) Westinghouse Representative - when NSSS items are involved...."

Finding: Contrary to the above, NRB Response Forms Number FBM-136, dated December 14, 1982 and June 14, 1983, providing a response to Nonconformance Report FBM-136, Reactor Trip Switchgear Discrepancy, did not indicate that the Westinghouse Representative was a member of the Review Board in that an "N/A" (not applicable) was placed on the line where the Westinghouse Representative would be required to sign for his concurrence.

Response: All NCRs affecting NSSS items have been reviewed. A total of seven of these NCRs did not have evidence of Westinghouse concurrence. These NCRs have been transmitted to Westinghouse with a request for concurrence. It is anticipated that Westinghouse concurrence will be obtained by June 20, 1985. In order to preclude recurrence applicable site personnel have been re-instructed on the requirement for obtaining Westinghouse's concurrence for dispositions of NCRs affecting NSSS items.

D. Requirement: Section 17.1.3.1, "Design Requirements", of the UE&C Topical Report UEC-TR-001-6A, dated September 16, 1982, states, in part, "Verification for inclusion of appropriate quality standards in design documents by the QA Engineer is performed using a checklist during the review of engineering documents. This verification provides assurance that design characteristics can be controlled, inspected, and tested; and it also assures the identification of inspection and test acceptance criteria in design documents."

Finding: Contrary to the above, UE&C Specification 143-1, utilized for the procurement of 480 volt motor control centers, did not include test requirements for the Class 1E switchgear components to ensure that the individual components meet the technical requirements.

Response: This finding is associated with the problem described in IE Information Notice No. 85-16. Change Order No. 105 has been issued to incorporate the necessary testing requirements into Purchase Order 143-1. This is in addition to the 100% safety related circuit breaker testing being performed as part of the plant pre-operational start-up phase.