

**SARGENT & LUNDY
ENGINEERS**

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September 21, 1978
Project No. 0037-00

Sargent & Lundy Responses to
Report of NRC Inspection,
Report Number 99900507/78-02

Mr. Uldis Potapovs
Chief, Vendor Inspection Branch
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011

Dear Mr. Potapovs:

This letter is in response to the findings identified in your inspection report, number 99900507/78-02, received by Sargent & Lundy August 31, 1978.

Sargent & Lundy's responses to your findings are as follows:

Action on Previous Inspection Findings

1. (Open) Deviation (Report No. 77-03): Duplicate record storage practices and facilities are not being maintained as required. Sargent & Lundy (S&L) has proposed to the Quality Assurance Branch (QAB) of NRC an alternate method for complying with the regulations. This matter has not been completely resolved between S&L and the QAB and will remain an open item until resolved.

Response

A request from Sargent & Lundy, letter dated September 1, 1978, has been submitted to the Quality Assurance Branch of the NRC regarding acceptance of a four hour rated record data safe as adequate implementation of the requirements for a single records storage facility.

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Action on Current Findings

1. Deviation - Sargent & Lundy procedures which implement 10 CFR 50, Appendix B, requirements state in part the following:

GQ-3.04 (Design Criteria) - "The Preparer shall distribute the design criteria to interfacing departments and divisions for comment The Preparer shall maintain a copy of all comments, their resolution and documentations of differences from the PSAR in file."

GQ-3.07 (Sargent & Lundy Drawings) - "The Project Leader/Supervisor/Supervising Design Engineer shall distribute the drawing along with a drawing transmittal sheet to interfacing departments and divisions for review and comments..... The Project Leader/Supervisor/Supervising Design Engineer shall maintain a log containing information as to whom and when the drawing was sent for comments and when the comments were received... The Project Leader/Supervisor/Supervising Design Engineer shall maintain a copy of all comments and their resolution in the file for the project....."

Contrary to the above requirements, comments were not obtained and/or documented on the following items even though the documents had been issued.

- (a) C-8X23WDF86X7A, Containment Spray Pumps (Revision 1, February 1, 1978) - No response from two requested to comment.
- (b) S1617, Auxiliary Building Plan Elevations, 463-4, request for comments transmitted December 16, 1977, on I-130; no response from two requested to comment.
- (c) 6E-2-4030VX12, Schematic Diagram, Essential Service Cooling Tower Sub Ventilation Fan Dampers (Revision 0, December 19, 1977) - No documentation to show transmittal for, or receipt of, comments.
- (d) DC-EF-01-BB, Design Criteria Engineered Safety Features - No response from four requested to comment.

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Response

Sargent & Lundy will take the following actions at the scheduled dates indicated below (paragraph numbers correspond with those used in subject NRC Report):

a) and b)

Comments will be solicited from the parties who failed to respond to the original requests for comments. Any applicable comments will be incorporated into the next revision of the document. To preclude recurrence of this deviation, responsible personnel will be cautioned to conform to all requirements of GQ-3.07. The above actions will be completed by November 1, 1978, and documentation will be on file for your inspection.

c) At the time of the inspection, the wiring section project leader was unable to present documentation showing the transmittal for, or the receipt of comments for drawing 6E-2-4030VX12, Rev. 0. A subsequent search of the project leader's files uncovered documentation which indicated that the required comments were received on December 20, 1977. A memorandum will be issued by October 2, 1978, to all responsible Electrical Design and Drafting Division personnel instructing them to provide closer control of their filing systems.

d) Comments will be solicited from the parties who failed to respond to the original requests for comments. Any applicable comments will be incorporated into the next revision of the document. To preclude recurrence of this deviation, responsible personnel will be cautioned to conform to all requirements of GQ-3.04. The above actions will be completed by November 1, 1978, and documentation will be on file for your inspection.

2. Deviation - 10 CFR 50, Appendix B, Criterion XV, states in part, "Nonconforming items shall be reviewed and accepted, rejected, repaired or reworked in accordance with documented procedures." Contrary to this, S&L does not have procedures for review and acceptance, rejection, or other disposition of Vendor NCRs (nonconformance reports) when they are submitted directly by the Vendor to S&L.

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Related to this deviation, the Sargent & Lundy scope of work usually does not require vendors to send nonconformances to specification requirements directly to S&L for review and resolution. Generally, these are sent to the client (licensee), who may request S&L review. However, on at least one project, S&L scope does include primary responsibility for the review and evaluation of vendor NCRs and proposed corrective action. The applicable PSAR Section 17.A.1.15 states that, "Requirements are established in procurement specifications that vendors shall furnish documentation of any nonconformance. Sargent & Lundy reviews documented instances of nonconforming parts and components where such nonconformance affects the design... S&L reviews and makes recommendation.....for accepting of nonconformances, discrepancies, deviations or conditions adverse to quality requiring "use as is" or proposed rework or repair techniques." Also Section 05.01 of the S&L Topical SL-TR-1A requires that, "Activities affecting qualityare prescribed in documented procedures which clearly assign responsibility and describe the required sequence of actions. Project Instructions are prepared to provide for.... client requirements not addressed in a Quality Assurance procedure." No Quality Assurance procedure exists and no Project Instruction has been generated for this project to cover review and recommendation of disposition of vendor NCRs or transmittal to client (licensee) for verification of corrective action. To date, it appears that only one vendor NCR has been received and proposed corrective action made by S&L Mechanical Engineer (See item 2.3.(1) in Method of Accomplishment above).

Response

A project instruction is under preparation covering the disposition of Vendor nonconformances for the project in question. The project instruction is scheduled to be approved and issued by October 31, 1978, which will prevent recurrence of this item. Also, all nuclear Project Managers will be reminded at the regular October project management meeting that documented procedures are required for all activities affecting quality.

3. Unresolved Item - Sargent & Lundy Procedure GQ-3.12 (Project Status Reports) states in part: "In the event that no changes have occurred since its previous issue a revision to a Project Status Report will not be required. However, if a periodic

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revision is not prepared....all recipients...shall be notified in writing.... The following Project Status Report shall be issued..... System and Structure Design Review Status Report (issued quarterly)."

Procedure GQ-3.12 also states in part, "Page numbers shall either indicate the number of the page and the total number of pages or each page shall be numbered and the last page shall be identified as the final page."

The last issue of System and Structure Design Review Status Report for project Nos. 4391/4392/4683/4684 was issued on January 31, 1978. The periodic revision would be due on March 31, 1978, or a written notice would be issued to all recipients; time did not permit a full investigation of this matter to determine if a written notice had been issued, or if there were other procedures or instructions with different requirements. Also, the last issue of Project Specifications Status Report for project Nos. 4808/4923 (dated July 12, 1978) did not clearly identify the last page.

These items will be further investigated and evaluated during the next inspection.

Response

The System and Structure Design Review Status Report for Project Nos. 4391/4392/4683/4684 was issued January 31, 1978 as Revision 6. Revision 7 was issued on May 31, 1978 and Revision 8 was issued on August 31, 1978. Revision 7 should have been issued April 30, 1978 but issue was held up for one month. The Project Manager has been made aware of this deviation and will make every effort in the future to ensure that the report is issued at three month intervals.

The Project Specification Status Report for Project Nos. 4808/4923 issued for the period ending August 31, 1978 has been corrected to identify the last page of the report as "Report Complete." The project personnel responsible for the issuance of the Specification Status Report have been instructed to make sure all format requirements are followed in the future.

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If there are any questions regarding our responses, please do not hesitate to contact me.

Yours very truly,

J. E. McFarland

J. E. McFarland
Head, Quality Assurance
Division

JEM:mb
In Duplicate
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