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Black & Veatch
Quality Assurance Program

B&V Project 0001
QA File: 25.8000.21
September 7, 1978

Ref: Docket No. 99900526/
78-01

United States Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Attention: Mr. U. Potapovs, Chief
Vendor Inspector Branch

Gentlemen:

This letter refers to your inspection report dated August 14, 1978. The report was of Mr. C. J. Hale's inspection of the Black & Veatch Engineering offices conducted in July, 1978.

None of the material contained within the body of this inspection report is considered proprietary to Black & Veatch. Therefore, we have no objections to the report being placed in the public document room in accordance with the provisions of the commission's rules of practice.

Attached to this letter is the Black & Veatch response to the Notice of Deviation.

Very truly yours,

BLACK & VEATCH

Riley D. Woodson

REB:dew

Attachment

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The following responses to the Notice of Deviation are letter identified identical to notice. The entire Notice of Deviation is not reprinted here.

Response A: Directives have been prepared and issued to the Project Manager and Supervisor of the Power Division Document Control Center to provide copies of the Project Design Manual and Quality Assurance Program--Nuclear to the Project Document Control Administrator for inclusion in the Quality Assurance Records Systems. These directives were issued the week of September 4, 1978, to be implemented prior to September 30, 1978. This action is available for reinspection at the convenience of the Commission. Each of the various procedures within the Quality Assurance Manual--Nuclear contain a definition of the required Quality Assurance Records associated with the documents being prepared. A reexamination of the Quality Assurance Program procedures will be accomplished by Black & Veatch to determine what measures are necessary to prevent reoccurrence of a similar event. It will take until approximately December 30, 1978 to complete a reexamination of the procedures contained within the Quality Assurance Program--Nuclear to verify that the appropriate requirements are included to direct the appropriate filing and maintenance of Quality Assurance Records.

Response B: A reexamination of the records of Geotechnical Services is underway to ascertain the specific services that were provided after the initial investigations of 1974. The safety significance of any studies between early 1974 and into 1976 will be examined to determine if an audit should have been conducted. This investigation of the scope of work will not be completed until October 30, 1978. On-the-job-training has been conducted with project management personnel to reemphasize the commitments of the Quality Assurance Program concerning the frequency of required audits. The scheduling aspects of the internal Black & Veatch audit program will be reexamined to provide specific audits of the document control and quality assurance records area when the next schedule of audits is prepared in October 1978. Audit scheduling has been completed through October of 1978. These functions are being incorporated in the next scheduling period of audits and, therefore, would appear in the future audit planning on a reoccurring annual basis.

Response C: A specific checklist has been added to the Black & Veatch QA Group instructions to guide auditors in future activities to more specifically comply with activities included in ANSI N45.2.12. The audit checklist is provided for the lead auditor's use in completing the performance of an audit, starting with the preaudit conference and

continuing through the requirements necessary for issuance of the audit report. This internal checklist for the use of lead auditors is the long term corrective action for the compliance of audit activities.

Specific reexamination of the audit reports of 1977 and 1978 (to date) will be accomplished by the Quality Assurance Manager. The purpose of this reexamination will be to correct such inconsistencies as unsigned audit reports, documentation of any audits that have not been previously reported, and similar activities that can be corrected to provide accurate quality assurance records. This reexamination of the 1977 and 1978 audit reports will be completed prior to December 30, 1978.