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 RECIP. NAME: RECIPIENT AFFILIATION
 SPENCER, G. S. Region 4, Dallas, Office of the Director

SUBJECT: Discusses error re date of full compliance per IE Insp Rept
 50-397/79-16 on 800225-28. Full compliance re improper
 maint of instrument racks by Fischbach/Lord Electric Co will
 be achieved on 800331, not 800131.

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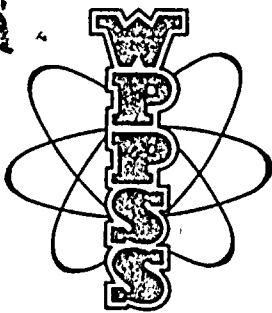
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February 29, 1980
G02-80-43

G. S. Spencer, Chief
Reactor Construction and Engineering Support Branch
Nuclear Regulatory Commission
Region V
Suite 202, Walnut Creek Plaza
1990 N. California Boulevard
Walnut Creek, California 94596

Subject: WPPSS NUCLEAR PROJECT NO. 2
DOCKET NO. 50-397, CPPR-93
NRC INSPECTION - OCTOBER 22-25, 1979
REPORT NO. 50-397/79-16

References: 1) Letter G.S. Spencer to N.O. Strand, dated 12/18/79
2) Letter G02-80-20, dated 2/4/80

Dear Mr. Spencer:

During a routine unannounced inspection conducted by your Messrs. T.W. Bishop, D.P. Haist, and W.J. Wagner on February 25-28, 1980; Mr. Bishop, in an attempt to follow-up Item of Enforcement 79-16-06, found an apparent error as to the date of full compliance contained in Reference 2.

The error pertains to Notice of Violation A. (2) relating to improper maintenance of instrument racks by Fischbach/Lord Electric Company. The action to prevent recurrence states in part:

"Surveillance activities have been increased to assure implementation of maintenance requirements and protection from construction activities. Corrective Action Request No. 218-1424, against the deficient maintenance and cleanliness activities, has been issued to the contractor. A revised maintenance procedure has been issued which clarifies maintenance requirements and establishes specific time intervals for maintenance performance. Audits/Surveillances are being conducted to verify adequate corrective action."

Our response in Reference 2 stated that full compliance was achieved on January 31, 1980.

Boo
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During the period from December 1, 1979 through February 28, 1980, Fischbach/ Lord Electric Company conducted nineteen (19) documented surveillances to assure implementation of their maintenance requirements for protection of equipment. Additionally, WNP-2 Project QA conducted three (3) documented surveillances during the same period of time. Corrective Action Request No. 218-1424 response has been received from the contractor. WNP-2 Project QA had found the response to be acceptable, but was not closing the CAR pending verification of the revised maintenance procedure. The revised maintenance procedure was submitted initially on December 4, 1979, and at that time, was given "N/A" (not approved) status. Subsequently, the maintenance procedure was again transmitted on December 26, 1979, and returned to the contractor "as-noted" on January 16, 1980. Although the revised maintenance procedure has never been implemented by Fischbach/Lord, Maintenance Procedure No. CP-208, Revision 4, is presently being followed and implemented. The amount of time taken to get a revised maintenance procedure finalized is due to complexities which arose between the licensee and the contractor regarding certain computer interfaces. The contractor is also in the process of developing inspection plans which will be incorporated into the revised maintenance procedure. Presently, contractor and owner surveillances are ongoing to verify proper maintenance of equipment. The corrective action noted by the contractor in the Corrective Action Request stipulates that an audit will be performed within thirty (30) days after implementation of the revised procedure. WNP-2 Project QA will verify that this audit has been conducted prior to closure of Corrective Action Request No. 218-1424.

It was an error on our part to indicate that full compliance was achieved on January 31, 1980. It was our intent that the contractor's maintenance procedure would be revised and fully implemented by January 31, 1980, and that the equipment would be properly maintained and protected by that date. The latter did occur. Although hardware maintenance activities have been upgraded and are continuing, full compliance in the form of final approval of improvements to existing and adequate procedures will be achieved when the revised procedure is approved and implemented by March 31, 1980. This process is being expedited.

Very truly yours,

D L Renberger

D. L. Renberger
Assistant Director, Technology

DLR/JMS/vh

cc: JM Blas - B&R, NY
HR Canter - B&R, NY
Spike Ford, NUS
JR Lewis - BPA, Richland
V Stello - Office of Inspection & Enforcement, Washington, D.C.
JJ Verderber - B&R, NY

