



September 29, 1978
L-78-316

Mr. James P. O'Reilly, Director, Region II
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: RII:EHV
50-250/78-12
50-251/78-12

This letter is in response to a request from Mr. Verderry of your staff to review the corrective action for findings B and C of the subject audit report proposed in our letter to you of September 18, 1978. As a result of our review we are modifying our corrective action as follows:

Finding B

ANSI 18.7 - 1972 requires in part that procedures for maintenance which could affect the performance of safety related equipment provide for the documentation of the permission of responsible operating personnel to release the equipment or systems for maintenance.

A letter will be issued to appropriate personnel by October 6, 1978, requiring that operational release be obtained and documented prior to commencing any maintenance on safety related equipment which requires an equipment clearance. The letter will further require that operational release be obtained and documented prior to commencing any maintenance on safety related equipment which involves the use of a procedure. The necessity for operational release for maintenance on safety related equipment not requiring a clearance or involving a procedure will be determined on a case by case basis. If, in the case of maintenance on safety related equipment not requiring a clearance nor involving a procedure, it is determined that operational release for maintenance is required, the requirement will be noted on the Plant Work Order. Compliance will be achieved as of October 6, 1978.

These requirements will be included in a plant procedure by October 31, 1978. This will provide further assurance of the full implementation of our policy on prior operational release for maintenance as described above.

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Finding C

A special instruction to the appropriate operations personnel will be issued by October 6, 1978. This special instruction will emphasize the importance of the control of clearances for nuclear safety related components in accordance with plant procedure AP0103.4. We have verbally stressed the importance of control of clearances to the appropriate personnel. An inspection of control of clearances on September 27, 1978, indicated that compliance had been achieved.

Please feel free to contact me or members of my staff if you should have any question in this matter.

Very truly yours,


R. E. Uhrig
Vice President

cc: Robert Lowenstein, Esq.