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Dalwyn R. Davidson
VICE PRESIDENT
SYSTEM ENGINEERING AND CONSTRUCTION

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June 15, 1979

Mr. Gaston Fiorelli
Reactor Construction and
Engineering Support Branch
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Fiorelli:

This letter is to acknowledge receipt of your Inspection Report Number 50-440/79-04; 50-441/79-04, attached to your letter dated May 15, 1979, which I received on May 17, 1979. This report identifies areas examined by Messrs. J. E. Konklin and J. Hughes during the inspection conducted at Perry Nuclear Power Plant from April 18 through 20, 1979.

Attached to this letter is our response to the one (1) Item of Noncompliance described in Appendix A, Notice of Violation, of the above referenced I. E. Report. This response is in accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations.

Please do not hesitate to call if I may be of further assistance.

Very truly yours,

D. R. Davidson
Vice President
System Engineering and Construction

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Attachment

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RESPONSE TO ENFORCEMENT ITEMS

Below is the response to the noncompliance identified in Appendix A, Notice of Violation, enclosed with United States Regulatory Commission I. E. Report No. 50-440/79-04; 50-441/79-04.

I. A. Infraction

10CFR50, Appendix B, Criterion XIII, states in part, that "Measures shall be established to control the handling, storage, shipping, cleaning and preservation of material and equipment ... to prevent damage and deterioration." CEI Project Administration Procedure 1301, Revision 0, effective September 29, 1978, establishes ANSI N45.2.2, "Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage and Handling of Items for Water Cooled Nuclear Power Plants (Revision 2, May, 1977)" as a project standard. The applicable Newport News Specification, SP-96-4549-00 dated December 18, 1975, states in Section 5:16, that "Receiving, storage, and handling shall be in accordance with the requirements of ANSI N45.2.2, Level D."

Contrary to the above, on April 20, 1979, at Azimuth 210 on the Containment No. 1 weir mat level, the inspector observed ten pipe sleeves intended for installation in the Unit 1 Bioshield Wall which were not stored in accordance with ANSI N45.2.2 Level D requirements, in that the sleeves were not on dunnage, and ladders, angle iron and miscellaneous steel pieces were on top of the sleeves.

B. Response

1. On May 1, 1979, the PNPP Construction Management organization notified Construction Quality Engineering that clean-up of the area had been completed and that the storage of the referenced pipe sleeves was now in accordance with the Level D requirements of ANSI N45.2.2. The responsible Quality Engineer then confirmed that ladders, angle iron, and miscellaneous steel pieces had been removed, that the pipe sleeves had been placed on dunnage.
2. Periodic monitoring of this location is being performed by the responsible Quality Engineer to assure that the noted condition remains corrected. Additionally, all contractors have again been instructed by the Construction Management organization on their contractual requirements for housekeeping.
3. Full compliance has been achieved.

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