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Dalwyn R. Davidson

VICE PRESIDENT

SYSTEM ENGINEERING AND CONSTRUCTION

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November 8, 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 50-440/79-07; 50-441/79-07 attached to your letter dated October 4, 1979, which I received on October 8, 1979. This report identifies areas examined by Mr. C. M. Erb during the inspection conducted at Perry Nuclear Power Plant from September 10 through 12, 1979.

Attached to this letter is our response to the one (1) Item of Non-compliance 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 call if I may be of further assistance.

Very truly yours,

D. R. Davidson
Vice President
System Engineering and Construction

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RESPONSE TO ENFORCEMENT ITEMS

Below is the response to the noncompliance indentified in Appendix A, Notice of Violation, enclosed with United States Nuclear Regulatory Commission I.E. Report No. 50-440/79-07; 50-441/79-07.

I. A. Infraction

10 CFR 50, Appendix B, Criterion X requires, in part, that a program. . . . to verify conformance with documented procedures. . . . shall be established and executed by or for the organization.

Paragraph 10.1300 of the NNIC Manual states that, "QA will maintain the original of all manufacturing and inspection sheets (MII's), which shall be available to QC inspectors and the ANI. Verification of each step in the MII will be performed by QA".

Contrary to the above, verification (by signature) of installation steps was missing both in the installer column and QA/QC column on MII No. 1240-F-I005-2, Revision 3. Without signature hold points near the end there is no way of telling where the setting operation was discontinued.

B. Response

1. A detailed review of instruction 1240-F-I005-2, Revision 3, will be conducted to identify and correct discrepancies. Verification will be accomplished by review of associated records such as inspection reports, production reports, or weld history records. Operations that cannot be verified by reference to associated records will be reinspected or reworked, as appropriate. Operations which cannot be verified or reworked will be identified as nonconforming for Engineering resolution.
2. The contracts for the installation of NSSS equipment, as defined in Specifications 38 and 39, have been withdrawn from Newport News Industrial Corporation. Other safety-related work being done by NNIC will be conducted in accordance with MII's. The MII System will be fully described in a specific NNIC instruction which will cover the preparation, review, approval, implementation and completion of MII's. Training sessions will be given to all affected NNIC personnel before the MII instruction is implemented for field operations.
3. Full compliance will be achieved by December 17, 1979.