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September 28, 1981

D. L. ASWELL
Vice President-Power Production

W3K-81-0352
Q-3-A35.02.01

Mr. K. V. Seyfrit, Director, Region IV
U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

Subject: Waterford SES Unit 3
IE Inspection Report - 50-382/81-15

Dear Mr. Seyfrit:

The following information regarding the infraction cited by the USNRC Inspectors in IE Inspection Report No. 50-382/81-15 dated July 10, 1981, is herewith submitted.

Notice of Violation

Based on the results of the NRC inspection conducted from May 16 - June 15, 1981, the following violation was identified:

Criterion V of 10CFR50, Appendix B, states that activities affecting quality shall be prescribed by instructions, procedures or drawings of a type appropriate to the circumstances and that these activities shall be accomplished in accordance with these instructions, procedures or drawings.

Ebasco construction drawings LOU-1564 G-194 and G-207 require that Pipe Spools 2 CH 3-80 A/B-12 and 2 CH 3-80 A/B-11 be sleeved where they pass through concrete walls.

Contrary to the above, on June 9, 1981, the NRC inspector observed that the above pipe spools had been installed without pipe sleeves and that they were embedded in the concrete walls.

This is a Severity Level V Violation (Supplement II.E)

Corrective Action Taken and Results Achieved

- 1) Nonconformance Report W3-2774 was initiated which identified this problem as a program deficiency. This nonconformance is now under evaluation by the Ebasco Engineering Department. The corrective action for each of the locations where a pipe sleeve is missing will be included in the disposition of the nonconformance.

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- 2) The concrete drawings have been researched and the missing pipes and pipe sleeves in blockouts which have already been placed have been identified. As a result of this research, it was determined that there were sixteen (16) pipes installed without a sleeve, seven locations where the pipe and sleeve had been left out, and two (2) locations where the sleeve had been installed but the pipe was left out.

Steps Taken to Preclude Recurrence

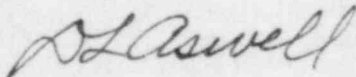
Ebasco Construction Procedure, CP-707, was revised on July 28, 1981, to assign responsibility for checking pipe sleeves in blockouts to Ebasco Services Construction Engineering. The piping contractor retained responsibility for line and grade of pipes. Ebasco Quality Control Procedure, WQC-115, was revised on July 13, 1981, to provide explicit directives for inspection verification and sign-off by the responsible Quality Control personnel in regard to mechanical items including pipes and pipe sleeves. The procedure also provides for the necessary interface with all other contractors where the work includes other discipline inspection. Since the revisions to these procedures have been implemented, no deficiencies similar to the one cited by the subject IE report have been identified.

Date When Full Corrective Action Is Achieved

Full corrective action will be achieved by March 1, 1982. Completion of corrective action is predicated upon the amount of rework dictated by Ebasco Engineering in the final disposition.

If you have any questions concerning this response, please advise.

Yours very truly,



D. L. Aswell

DLA/LLB/grf

My Commission expires 6-1-74 2/1/75