



Public Service of New Hampshire

May 8, 1985

SBN-800
T.F. B4.2.7

United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Attention: Mr. Stewart D. Ebnetter, Director
Division of Reactor Safety

References: (a) Construction Permits CPPR-135 and CPPR-136,
Docket Nos. 50-443 and 50-444
(b) USNRC Letter dated April 9, 1985, "Inspection
Report No. 50-443/84-18", S. D. Ebnetter to
R. J. Harrison

Subject: Response to Inspection Report No. 50-443/84-18

Dear Sir:

Our response to the violation reported in the subject inspection is provided in Attachment A, included herewith. Your letter, however, raises a couple of issues which we intend to discuss briefly herein and in more detail during our Region I meeting on May 15, 1985.

We are concerned with the time delay from the period of inspection to Region I's formal notification. It also appears, that concerns raised in the exit meeting have been escalated in your formal notification to include a concern regarding management control of general plant cleanliness.

In regards to this additional concern project quality assurance will monitor the effectiveness of the general cleanliness program, as described in Attachment "A", through a system of audit and surveillance inspections. If the general cleanliness program is not effectively implemented then escalated management action will be initiated.

Very truly yours,

John DeVincentis, Director
Engineering and Licensing

Attachment

cc: Atomic Safety and Licensing Board Service List

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ATTACHMENT A

NRC NOTICE OF VIOLATION (443/84-18-02)

10CFR50, Appendix B, Criterion V states, in part, that "Activities affecting quality shall be prescribed and ... shall be accomplished in accordance with these instructions".

Section 5.7 of Procedure No. FIP-20 states that: "garbage, trash, scrap, litter, or other waste/excess material shall be deposited in a suitable container as it is generated".

Section 5.8 of this procedure states that: "Excess materials shall not be allowed to accumulate and create conditions detrimental to quality and/or safety".

Contrary to the above, on December 3, 1984, the inspector observed an accumulation of trash, debris throughout the facility considered detrimental to quality and safety.

This is a Serverity Level V violation, Supplement II.

RESPONSE

Corrective Action Taken and Results Achieved

One of the three major groups on-site (i.e., Construction, Startup, Station Staff) is designated as the group primarily responsible for the general cleanliness of a given building/area. The group designated is the one which has overall site responsibility for a given building/area, generally based on the construction schedule (e.g., after building turnover Station Staff is the designated group). When overall building/areas' responsibility is transferred from one group to another, the responsibility for cleanliness shall also be transferred.

An individual has been designated within each of these groups as the prime contact for housekeeping for that group. It is the responsibility of this individual to monitor the implementation of housekeeping requirements; to assure that any housekeeping deficiencies identified are corrected and generally to be the contact for any housekeeping problems.

The following guidelines shall be used to monitor implementation of housekeeping requirements.

- (a) A walkdown inspection shall be performed by the responsible prime contact.
- (b) The walkdown shall be conducted weekly.
- (c) Each walkdown shall cover all buildings/areas containing plant equipment within the responsibility of the designated group.
- (d) Both general area and specific housekeeping deficiencies shall be identified for correction.

The above corrective action has been implemented since December 18, 1984. In as much as housekeeping is an ongoing activity, this program will continue throughout the construction phase of the project.

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