

NUCLEAR REGULATORY COMMISSION

JUL 11 1984

J. Strick
(Info by)

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MEMORANDUM FOR: Thomas E. Murley, Region I Administrator
James P. O'Reilly, Region II Administrator
John Collins, Region IV Administrator
John Martin, Region V Administrator

FROM: Richard C. DeYoung, Director
Office of Inspection and Enforcement

SUBJECT: PROPOSED ENFORCEMENT GUIDANCE FOR CONSTRUCTION VIOLATIONS
(SUPPLEMENT II)

In a June 11, 1984 memorandum, Region III proposed an approach to enforcement for QA program violations based on its recent experiences at Braidwood and Fermi. We have reviewed the approach which was provided in the form of a Table and believe that issuance of some enforcement guidance in the construction QA area would be useful to all of the Regions. We are, therefore, sending the Region's proposed enforcement approach to you for review and comment. After we receive your comments, enforcement guidance will be developed and issued.

Although IE review of the proposed approach has not been completed and will continue concurrent with your review, we have the following preliminary comments which you may consider in your review. The guidance does not appear to address what enforcement action should be taken if the licensee's QA program has fallen significantly behind the progress of work at the site, or if deficiencies identified in the QA program will make it very difficult to determine the quality of hardware installed at the site. In such situations, we believe civil penalties or Orders should be considered despite the absence of known hardware deficiencies.

Please provide your comments to Jane Axelrad by July 20, 1984.

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PDR FOIA
GARDEB5-452 PDR

Richard C. DeYoung
Richard C. DeYoung, Director
Office of Inspection and Enforcement

Enclosure:
As stated

cc:
J. Keppler, RIII
J. N. Grace, IE
R. Heishman, IE
J. Partlow, IE
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Encl
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