

EXHIBIT 13

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From: David B. Pereira
To: Chris Vandenburg, Thomas Gwynn
Date: Wednesday, January 17, 1996 4:31 am
Subject: ANO FIRE PROTECTION (ALLEGATION RIV-95-A-0009)

1. Please have Phil Qualls coordinate with Russ Wise and OI (Kirspe) concerning the subject. OI is trying to closeout its investigation but the question as to whether a required record was falsified needs to be clarified. In particular, Phil's memo responding to the subject refers to the failure to replace screws in an electrical panel that enclosed a required fire seal as a minor violation of licensee procedures (potential NCV). However, it does not make clear whether the fire seal is the only safety-related matter involved or if the electrical panel closure is also safety related. This is a key point since the records related to the panel closure were falsified and it was unclear as to whether the work to close the panel was required to be done according to prescribed procedures or if the licensee applied its own procedures in an application where NRC did not have requirements. OI needs to know if that record was a record required by NRC.

2. On January 23, 1996, I contacted the Unit 1 ANO electrical modification department concerning the particular penetration and to determine if the electrical panel closure was also safety related. According to the electrical modification supervisor, Ray Kellar, the panel closure was not safety related. The cover over the electrical junction box was to prevent debris, and personnel from entering the box without a work permit. According to the Controlled Work Permit (CWP #90-2053/900034-3), the work classification was checked only for fire protection, and NOT "Q" or "Seismic". No quality control signature was required for reinstallation of the cover on the electrical panel. Quality control signatures were required for verification of installation of a 1 inch minimum Cerafiber/Kaowool/Ceraboard and verification that the fire seal was complete and free of visible defects.

The work to close the panel was required to be performed by the licensee procedures. There was no NRC requirement for the electrical panel to have the cover installed. The fire seal was the safety related NRC requirement and the seal was installed, verified by QC, and witnessed by appropriate licensee personnel. The electrical panel cover's purpose was to keep the junction box clean and prevent unauthorized entry into the junction box. The record which was falsified was the electrical cover reinstallation which is not an NRC record requirement.

CC: PMQ

EXHIBIT 13
Page 1 of 1 pages

CASE NO. 4 - 95 - 004