

JAN 25 2013

LES-13-00020-NRC

Attn: Document Control Desk
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Louisiana Energy Services, LLC
NRC Docket Number: 70-3103

Subject: Reply to Notice of Violation 70-3103/2012-007 – Supplement

Reference: 1. Letter from LES to NRC, LES-12-00183 Reply to Notice of Violation
70-3103/2012-007, dated January 03, 2013

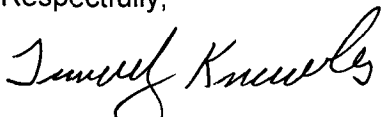
Since UUSA's transmittal of the referenced letter, it has been noted that some ambiguity exists in the language used in the UUSA Reply to Violation B. Additionally, work has been completed that required revision to UUSA Reply to Violation C. This has resulted in the enclosed supplement to the referenced reply.

Clarification is necessary in Section 2, "Corrective Steps That Have Been Taken and Results Achieved," Action 3, and in Section 4, "The Date When Full Compliance Will Be Achieved". This change provides specific detail to provide bounds to the inspections completed and bound the extent of the condition.

UUSA Reply to Violation C, Section 3, "The Corrective Steps That Will Be Taken," Action 1 has been revised due to the revision of CR 2012-3526. Specifically, UUSA has made a change to specification LES-S-S-00002 to clearly identify the basis for excluding verification of CRDB structural steel bolt-hole sizes and locations. Subsequent to the initial decision in 2010 to exclude bolt hole size and location as a critical characteristic for acceptance, additional confirmations were performed to demonstrate this initial engineering judgment constituted a valid approach in accordance with CGD requirements. Specifically, a review of the QL-1G erection plans and final as-built QL-1G surveillance of overall building dimensions confirmed these design characteristics were acceptably fabricated.

Should there be any questions regarding this submittal, please contact Timothy Knowles, UUSA Manager of Licensing and Performance Assessment, at 575.394.6212.

Respectfully,



Timothy Knowles for
Perry Robinson
Vice President of Regulatory Affairs and General Counsel

Enclosure: Reply to Notice of Violation 70-3103/2012-007 – Supplement

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ENCLOSURE

REPLY TO NOTICE OF VIOLATION (NOTICE) 70-3103/2012-007 – Supplement

UUSA Reply to Violation B

2. Corrective Steps That Have Been Taken and Results Achieved

3. An extent of condition was performed and concluded that the installation of 7/8" diameter bolts rather than 1" diameter bolts was limited to the identified location (Connection "D"), demonstrating compliance with design requirements. Connection "D" is one of the only connections where the larger size bolts were used for frame to frame connections. The extent of condition evaluation consisted of the following inspections:
 - Identify and inspect A490 bolting at all other locations where Connection "D" is called out for roof beam-to-roof beam connections. (Work Plan 1100-CIVIL-823-173) A total of three (3) locations in the structure were identified where connection "D" is specified for roof beam-to-roof beam connections. This represents the bounding condition.
 - Identify and inspect similar connections utilizing 1" diameter A490 bolts near the connection that prompted this CR. (Work Plan 1100-CIVIL-823-173)
 - Engineering to perform verifications on two (2) frame lines to include all roof beam-to-roof beam connections.

With the exception of the subject bolted connection, all accessible locations, where Connection "D" is called out, were found to have the correct size A490 bolts. The extent of this condition has been resolved. The subject bolted connection was corrected in Work Plan 1100-CIVIL-823-174. (CR 2012 3575)

4. The Date When Full Compliance Will Be Achieved

Full compliance has been achieved based on the inspection of accessible A490 bolted connections, as described in CR 2012-3575 Extent of Condition Evaluation, and correction of the subject bolted connection.

UUSA Reply to Violation C

3. The Corrective Steps That Will Be Taken

1. Revise specification LES-S-S-00002 to document the basis for excluding bolt-hole size and location as a critical characteristic for acceptance. (CR 2012-3526, Action 2). Specifically, this includes reference to the Commercial Grade Dedication Program requirements that allowed use of this approach, additional engineering justification that forms the basis for this approach, and a summary of subsequent additional QL-1G inspection activities that were performed that further confirm the acceptability of this original decision.