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 AUTH. NAME: AUTHOR AFFILIATION
 COOPER, N.E. Teledyne Engineering Services
 RECIPIENT NAME: RECIPIENT AFFILIATION
 EISENHUT, D.G. Division of Licensing

SUBJECT: Responds to 820819 letter re independent design verification program. Info will be used in preparation for 820901 meeting. Response is preliminary.

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NOTES: J Hanchett: 1cy PDR Documents. 05000275
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**TELEDYNE
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August 27, 1982
5511-107

50-275

Mr. D. G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

UNCONTROLLED COPY

Subject: Preliminary Response to Your Letter of August 19, 1982

Dear Mr. Eisenhut:

This is a preliminary response to your letter which we received on August 24, 1982. It is preliminary because we have not yet received a response to your parallel letter to PG&E and because a complete response requires both more information and more study on our part. Regardless, we believe that the information will be helpful in preparation for the September 1, 1982 meeting.

The numbered paragraphs which follow, consider the information requested by the similarly numbered paragraphs in your letter:

1. The unresolved IDVP and ITP EOI files which we presently believe will be addressed by the PG&E Corrective Action Program are as follows:

a. ITP Civil Engineering Activity

IDVP EOIs: 967, 977, 988, 993, 1009, 1014, 1022, 1026, 1028, 1092, 1094, 1095, 1097, and 1101. However, IDVP activities will also combine with respect to 993, 1095, 1100 and 1101.

ITP OIs: 8, 12, 18, 19, 20, 23, 24, 25, 26, 27, 32

b. ITP Piping Activity

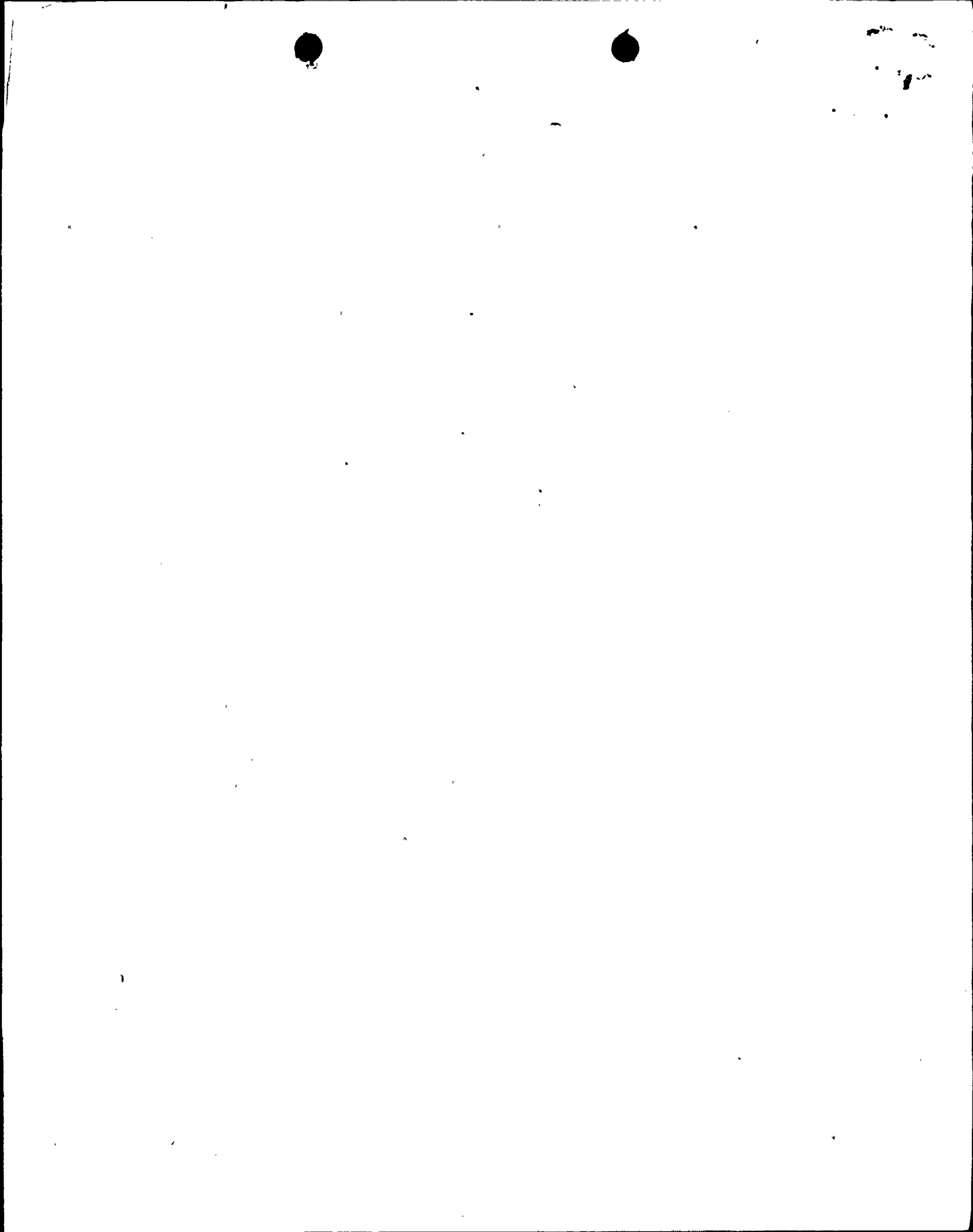
IDVP EOIs: 961*, 963, 964, 983, 1016, 1021*, 1047, 1058*, 1059*, 1060, 1098*. The five indicated by an asterisk (*) will be grouped as a Class A or Class B error as a result of the August 26, 1982 meeting and IDVP activities will continue with respect to 1047 and 1060.

ITP OIs: 1, 2, 3, 4, 6, 7, 8, 9, 10, 13, 14, 15, 16, 17, 21, 22, 29, 31, 33.

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- c. ITP Other Activity (not yet defined in detail to the IDVP but implied by the August 6, 1982 meeting.)

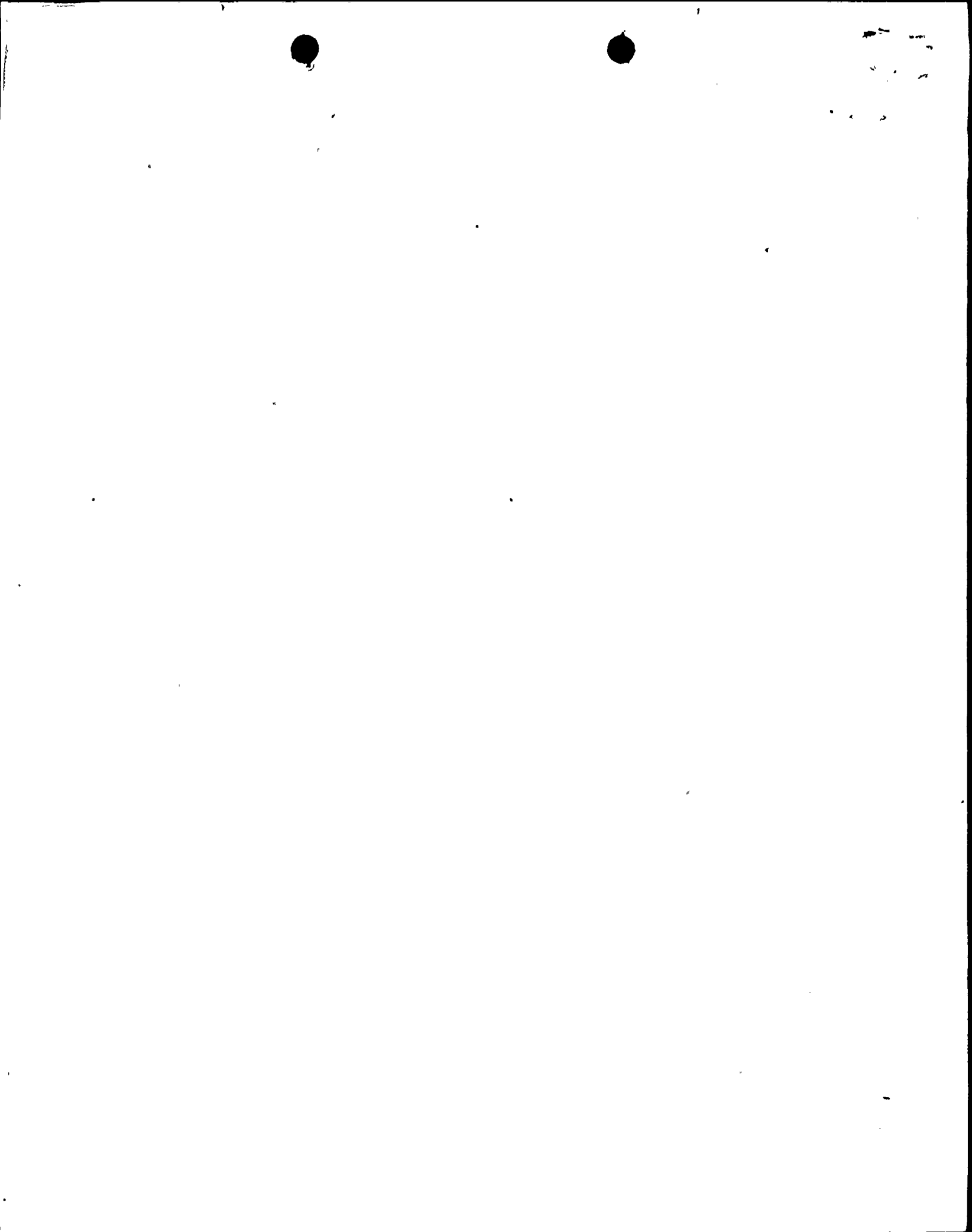
IDVP EOIs: 938, 949, 1069, 1088, 1096, 1099. However, IDVP activities will also continue with respect to 1088 and 1096.

ITP OIs: 5, 11, 28

2. ITP OI 30 is in our opinion, a Phase II subject and the IDVP will consider verification of that activity under Phase II.

It may be appropriate under this number to identify the IDVP EOIs not listed under number one and to indicate why they were not included there:

- a. EOIs 992 and 1083 have been recommended by RLCA to be Closed Items. If TES concurs, they will be closed. If TES disagrees, they will be assigned to the appropriate group.
- b. EOI 1072 is a Deviation and EOIs 1008, 1062, 1063, 1071, and 1074 are Class C Errors. In accordance with the Program Plan, if PG&E informs the IDVP that there will be no physical modifications in direct response to the IDVP action they will become Closed Items. If PG&E chooses to make a physical modification, they will be assigned to the appropriate group.
- c. EOI 1100 has been recommended by RLCA as a Deviation and EOIs 1003, 1080, 1081, 1084, 1085, 1086, and 1102 have been recommended as Class C Errors. TES is reviewing these files. If TES concurs, they will be included in the proceeding paragraph (2b.). If TES disagrees, they will be assigned to the appropriate group.
3. TES will respond after receipt and review of the information to be provided by PG&E.
4. An updated list of ITRs is included in Appendix 2 and a schedule in Appendix 3 of the IDVP August Semimonthly Report which will be sent to you on August 27, 1982. Both are, of course, subject to change for the reasons discussed in that report.
5. It is our intention that each EOI File be covered by an ITR. Appendix 2, Table 2, of the IDVP August Semimonthly Report indicates the present assignments. In addition, it is our intention to provide a printout of our program LISTLOG which documents the history of each EOI as an appendix to our Phase Report. All significant Errors (Class A or B) will be treated in additional detail in our Phase Report.



Mr. D. G. Eisenhut
Page 3
August 27, 1982

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6. We have received a copy of PG&E's letter of August 24th to you which responds to your request for a list of systems, structures, and components required for fuel loading. SWEC is reviewing this letter for us and we expect to provide preliminary comments at the September 1, 1982 meeting.

Very Truly Yours,

TELEDYNE ENGINEERING SERVICES

W. E. Cooper

William E. Cooper
Project Manager

WEC:cjr

cc: G. A. Maneatis
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