

(1) Corrective steps which have been taken and the results achieved:

NCR-3393 was initiated on January 31, 1979 documenting the specific occurrence and was forwarded to the GE Site Manager on February 6, 1979 to obtain GE concurrence with the recommended Bechtel disposition. On February 7, 1979 GE site issued Field Deviation Disposition Request (FDDR) KRL-134, Rev. 0 which described the arc strike as approximately 4" long. The resulting ground out area was 0.010 inch at the point of maximum depth. Processing of the FDDR resulted in a disposition which required ammonium persulfate solution etching and liquid penetrant testing of the ground area as per GE specification 22A4202, paragraph 11.5. Bechtel and GE Quality Control representatives witnessed the etching and liquid penetrant testing of the ground area on May 10, 1979. Etching and penetrant testing results were acceptable.

(2) Corrective steps which have been taken to avoid further items of noncompliance:

The corrective steps detailed above address the specific violation cited; however, ancillary to this is the fact that Bechtel had failed to notify GE of the arc strike prior to its removal as required by GE specification 22A2290, Rev. 0 "Field Welding and Fabrication of Process Piping". Such notifications have always been required by GE and this fact has been reaffirmed in GE correspondence dated February 2, 1979 (EAG-1039) to Bechtel.

In order to preclude recurrence of further items of this type, the following actions have been taken:

- Copies of correspondence, GE letters EAG-1039 dated February 2, 1979 and Bechtel letter M1-806, dated February 6, 1979 have been distributed to applicable Bechtel field engineers and superintendents. Letter EAG-1039 re-emphasizes GE's requirement for prompt notification prior to the performance of any rework on GE equipment by Bechtel and letter M1-806 reaffirms Bechtel's commitment to keep GE site apprised of all work performed during NSSS installation.
- Bechtel Field Procedure W-1, Rev. 6, paragraph 3.11 has been revised to describe the method used to document arc strikes and other surface defects prior to removal (Use of In-Process Rework Notice vs. Nonconformance Report) and any further processing such as notifying manufacturer, etc.

(3) The date when full compliance will be achieved:

As mentioned above, ammonium persulfate etching and liquid penetrant examination of the base metal was performed on May 10, 1979 at which time GE FDDR KRL-134, Rev. 0 was completed. Bechtel NCR-3393 was subsequently closed on May 14, 1979.

Bechtel Field Procedure W-1, Rev. 6 was approved on May 15, 1979.



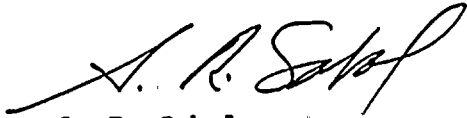
Mr. Robert T. Carlson

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May 23, 1979

We trust the Commission will conclude that the actions taken to date are adequate.

Very truly yours,



A. R. Sabol
Manager-Nuclear Quality Assurance

JRB:mcb

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