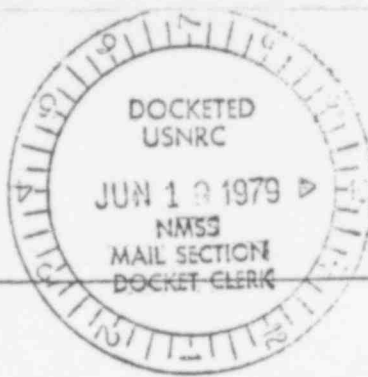


Babcock & Wilcox



PDR

70-1201 ✓

Power Generation Group

P.O. Box 1260, Lynchburg, Va. 24505  
Telephone: (804) 384-5111

June 12, 1979



Mr. J. G. Partlow, Chief  
Material Control Licensing Branch  
Division of Safeguards  
United States Nuclear Regulatory Commission  
Washington, D. C. 20555

REFERENCES: (1) SNM-1168, Docket 70-1201  
(2) Memo to D. W. Zeff from J. G. Partlow, Dated May 15, 1979

Gentlemen:

This is written in response to your letter (Reference 2) regarding acceptance of our measurement control plan which was submitted pursuant to 10 CFR 70.57(c) on April 27, 1979. In your letter an implementation period of 30 days was specified such that the plan would take effect by June 14, 1979. We are implementing the measurement control plan as requested; however, due to the complex nature of the plan, certain sections will need to be implemented on a phased basis to allow for the acquisition of new personnel, proper training and familiarization of both present and new personnel, the collection of sufficient data for the various statistical analyses, and proper review of our procedure system to assure all new areas of the measurement control plan are properly covered.

Specifically, our phased implementation plan is as follows:

I - Within 30 days - completion date June 14, 1979

- A. Collection of data for the additional statistical analyses outlined in Chapters 3 and 4 will commence and continued collection of data will proceed as required.
- B. All other requirements of the measurement control plan not specifically provided for in this phased plan will be implemented.

II - Within 90 days - completion date August 13, 1979

- A. Review and revision of the measurement procedures manual as outlined in Section 4.1 will reach 100% completion.

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II - Within 90 days - completion date August 13, 1979 (cont'd)

- B. The acquisition and training of the Measurement Control Coordinator for the additional statistical and measurement control duties in Chapters 3 and 4 will be completed.
- C. The first bi-monthly (i.e., every two months) statistical analysis of control data as outlined in Section 4.5.1 of the measurement control plan will be completed and subsequent bi-monthly analysis will be performed every other month thereafter.

III - All audit and review requirements stated in Chapters 3 and 4 will be initiated within the time intervals specified in the approved measurement control plan (i.e., annually, monthly, etc.) with subsequent audits and reviews performed accordingly.

The above listed dates represent commitments on our part to perform the indicated function. It should be noted, however, that satisfactory completion of Item IIB above (hiring of Measurement Control Coordinator) and subsequently Item IIC is contingent upon successfully completing the interview process as currently planned. Should it become apparent that the commitment date can not be met due to unforeseen events surrounding the interview process, we will inform you of the revised commitment date.

We believe that the approach outlined above is the proper course of action for implementing the provisions of the Measurement Control Plan in an effective manner. If you disagree with this approach or have questions concerning the phased plan, please feel free to call me at 384-5111, Ext. 5211 or J. P. Watters at 384-5111, Ext. 5966.

Sincerely,

BABCOCK & WILCOX COMPANY  
COMMERCIAL NUCLEAR FUEL PLANT



D. W. Jeff, Manager  
Safety, Licensing, and Safeguards

DWZ:cmm

cc: E. J. Silk  
J. P. Watters

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