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Dalwyn R. Davidson
VICE PRESIDENT - ENGINEERING

January 18, 1979

Mr. R. F. Heishman
Reactor Construction and Engineering
Support Branch
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Heishman:

This letter is to acknowledge receipt of your inspection report number 50-440/78-14; 50-441/78-13, attached to your letter dated December 15, 1978, which I received on December 19, 1978. This report identifies areas examined by Messrs. J. E. Konklin, J. H. Neisler, and F. C. Hawkins during the inspection conducted October 25 - 27, 1978.

Attached to this letter is our response to the two items of noncompliance described in Appendix A, Notice of Violation. This response is in accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations.

Please do not hesitate to call if I may be of further assistance.

Very truly yours,

D. R. Davidson

D. R. Davidson
Vice President - Engineering

Attachment

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RESPONSE TO ENFORCEMENT ITEMS

Listed below are the responses to the noncompliances identified in Appendix A, Notice of Violation, of the United States Nuclear Regulatory Commission I.E. Report No. 50-440/78-14; 50-441/78-13.

I. A. Infraction

10 CFR 50, Appendix B, Criterion X requires that, a program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity.

The PNPP PSAR Chapter 17, Section 17.1.10 states in part that, "Quality will be controlled by inspection or process control or a combination of both as necessary . . . Documented and approved procedures will be utilized to control the inspection methods . . ."

Contrary to the above, an adequate program for the inspection of safety-related backfill activities has not been established by the licensee and executed to verify conformance with backfill placement requirements.

B. Response

1. Great Lakes Construction Co. will hire an additional Level I Soils Inspector, whose responsibility shall be the field surveillance of backfill placing operations. The Level II Soils Inspector shall be responsible for placement surveillance, testing frequency and data, obtaining RGE approvals, and documentation of inspections. As backfill placing activities are limited at this time by the weather, the following measures are being taken to assure adequate coverage. Until the position of Level I Soils Inspector is filled, qualified and certified GLC Soils Inspectors are readily available for backfill surveillance. When construction progress warrants, they will be assigned to backfill placement inspection.

2. GLC Procedure TQCP 8 (Excavation and Backfill) is being revised to reflect the duties of Level I and Level II Soils Inspectors, as described above. Construction Quality Engineering shall continue to observe and audit GLC backfill placement inspection activities to assure the corrective action taken is being effective.

3. Full compliance will be achieved by February 14, 1979.

II. A. Infraction

10 CFR 50, Appendix B, Criterion XVI states in part that, "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected."

Perry Nuclear Power Plant Quality Assurance Procedure CQSP 1603, Rev. 0, Section 6.3.1 states in part that, "The Quality Control Supervisor shall review the surveillance/inspection AR Status monthly to determine the need for follow-up/close-out of surveillance/inspection AR's . . ."

Contrary to the above, timely corrective action to follow-up/close-out surveillance/inspection AR's was not taken by the licensee. Specifically, ten CEI surveillance/inspection AR's remained open past their respective Corrective Action Reply due dates with no monthly review to determine their status and no follow-up/close-out had been initiated. Failure to take timely corrective action to close-out AR's was cited once previously as an item of noncompliance in IE Inspection Report No. 50-440/78-02; 50-441/78-01 (Item No. 440/78-02-24; 78-01-24).

B. Response

1. The Surveillance/Inspection AR's referenced in I.E. Inspection Report 50-440/78-14; 50-441/78-13 are now closed out. For AR's #1 and #72, which had been closed out on July 7, 1978 and September 29, 1978, respectively, it was determined that the documents had not been forwarded to the Quality Administration element for logging and filing at the time of this NRC inspection.

2. The following system has been put into effect since that time to preclude recurrence of the problem:

   The CQC Supervisor receives a computer printout twice a month from CQS/Quality Administration which shows the status of the open Surveillance/Inspection AR's. The CQS/Quality Control Supervisor reviews the report and determines which AR's require follow-up action and notifies the initiator. The computer printout is kept in a notebook and made available for continuing review and follow-up.

II. B. 2. Cont'd

This meets the requirements of CQSP 1603, Rev. 1, Section 5.3.1, which states in part that, "The Quality Control Supervisor shall review the Surveillance/Inspection AR computer printout at least once per month to determine the need for follow-up/close-out of Surveillance/Inspection-initiated AR's."

3. Full compliance has been achieved.