

December 26, 1979

Mr. Gaston Fiorelli, Chief
Reactor Construction and
Engineering Support Branch
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Fiorelli:

This is in response to your letter dated November 27, 1979, which included a Notice of Violation and Inspection Report No. 50-461/79-11; 50-467/79-01. Our proposed corrective action with regard to the specific findings of the report includes the following:

1. The Notice of Violation states: "At least eleven U.S. Testing personnel were certified to Level I or II that did not meet experience requirements. This is not in accordance with UST Procedure UST-TQ-1, Revision 9, Section V, Paragraph 3.2 or 3.3."

Paragraphs 3.2 and 3.3 of Procedure UST-TQ-1 were not used for certification of the eleven UST personnel cited. Instead, Paragraph 3.1.2 of the procedure was used. This paragraph states: "The education and experience requirements specified below shall not be treated as absolute when other factors provide reasonable assurance that a person can competently perform a particular task. Other factors may be demonstrated capability in a given job through previous performance or satisfactory completion of proficiency evaluation."

UST also considers the extent or scope of the assignment in establishing proficiency. For example, the civil material testing personnel in question perform only a very narrow scope of tests to specific ASTM standards. The total training and qualification program required by UST for these personnel was consistent with the assignment and their procedures. This program, with appropriate supervision, provides the necessary assurance that these civil material testing personnel can capably perform the specific tests.

2. The Notice of Violation states: "UST Procedure TQ-1 does not appear to meet the intent of ANSI N45.2.6 as stated in Section II in that the experience requirements for high school graduates is less stringent than specified in ANSI N45.2.6-1973."

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Mr. Gaston Fiorelli

December 26, 1979
Page 2

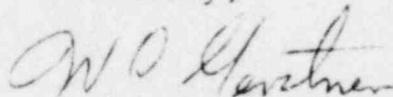
In our opinion, UST Procedure TQ-1 fully meets the intent of ANSI N45.2.6. We have letters from members of the ANSI working group which wrote the standard stating that the UST procedure meets the intent of the standard.

We understand that Region III participated in an NRC Headquarters meeting with other Regions and UST to clarify the interpretation of ANSI Standard N45.2.6 relative to both the 1973 and 1978 revisions. We understand that NRC representatives indicated general concurrence with the U.S. Testing interpretation of the Standard and concurrence with the use of the 1978 revision. In response, it is our intent to initiate the appropriate steps to incorporate the 1978 revision of ANSI N45.2.6 into the requirements for the Clinton project. In addition, we have taken the following steps to ensure proper implementation of the program:

- a. Future UST certification will clearly show the status of those individuals who are working under restricted or limited qualifications.
- b. UST procedures--coupled with appropriate supervision--which have been in effect to assure that those personnel working under restricted certifications are confined to the limits of their certification have been further clarified and will be continued.
- c. We have requested UST to review documentation of proficiency to determine whether or not additional visibility of proficiency evaluations can be provided.

I trust that the foregoing paragraphs constitute an acceptable program to support construction of the Clinton Power Station and satisfactorily complete our corrective action.

Sincerely,



W. C. Gerstner
Executive Vice President

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cc: CPS/DRC-MICROFILM, T-29