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Dalwyn R. Davidson
VICE PRESIDENT
SYSTEM ENGINEERING AND CONSTRUCTION

March 26, 1980

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

Dear Mr. Fiorelli:

This letter is to acknowledge receipt of your Inspection Report Number 50-440/80-01; 50-441/80-01, attached to your letter dated February 26, 1980, which I received on February 28, 1980. This report identifies areas examined by Messrs. J. E. Konklin and W. J. Key during the inspection conducted January 23 through 25, 1980.

Attached to this letter is our response to the one (1) item of non-compliance 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.

Should there be any questions, please don't hesitate to call.

Very truly yours,

D. R. Davidson
Vice President
System Engineering and Construction

ksz
Attachment

MAR 31 1980

RESPONSE TO ENFORCEMENT ITEM

Below is our response to Appendix A, Notice of Violation, of the United States Nuclear Regulatory Commission I.E. Report 50-440/80-01; 50-441/80-01.

I. A. Deficiency

10CFR50, Appendix B, Criterion XVII, states in part, "Sufficient records shall be maintained to furnish evidence of activities affecting quality...The records shall also include...qualifications of personnel..."

CEI PSAR Section 17, subsection 17.1.10 Inspection, paragraph 17.1.10.1 (f) states in part, "Personnel having assigned responsibilities involving inspections, test, examinations...are to meet the qualification requirements of Regulatory Guide 1.58 which endorses ANSI N45.2.6, Qualification of Inspection, Examination and Testing Personnel..."

General Electric (GE) Procedure PQI-8001, Revision 1, Section 2.3 states "This procedure satisfied the guide lines of the American National Standards Institute ANSI N45.2.6..."

ANSI N45.2.6, section 2.2.4 states that "The qualification of personnel shall be documented in an appropriate form...shall include the following...(3) activity qualified to perform."

Contrary to the above, during the inspector's review of GE I&SE quality control inspectors' qualification records on January 24, 1980, none of the records indicate what activities the inspectors were qualified to perform.

B. Response

1. The GE I&SE qualification records for quality control inspectors assigned to the SP-65 contract are being reviewed and amended to reflect the activities which each inspector is qualified to perform.
2. GE I&SE Procedure PQI 8001 is being revised to include the requirement to show the "Activity Qualified to Perform" on the certificate for the individual being certified.
3. Full compliance will be achieved by April 15, 1980.