



LOWELL E. ROE  
Vice President  
Facilities Development  
(419) 259-5242

October 9, 1975

Docket No. 50-346

Mr. James G. Keppler  
Regional Director, Region III  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

Toledo Edison acknowledges receipt of your September 16, 1975 letter and enclosure referencing an apparent noncompliance with NRC regulations. This item resulted from the site inspection conducted by your office on August 18-20, 1975.

Toledo Edison offers the following information regarding the apparent noncompliance, including corrective action and steps taken to avoid further occurrences.

Item A-2: Contrary to 10CFR50, Appendix B, Criterion V, Repairs to Reactor Coolant Pump 1B1 were being performed without an approved Procedure. (Report Details, Paragraph 1)

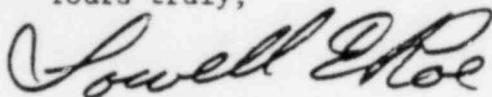
The repair work that was being done involved removal of an indication in the pump casing found as a result of the In-Service Baseline Inspection radiography. The calculated location of the indication in the casing was such that the most logical approach to repairs was to start removal of material from the outer side of the casing wall. The repair procedure was developed to remove the indication and repair work commenced. The indication was not found at the depth calculated and further evaluation showed that the indication location could be better reached by starting from the inner wall. This work was commenced, using the same procedure, and work was in progress at the time of the NRC inspection.

Work was stopped immediately by the B&W Quality Control Supervisor and B&W Field Construction Procedure Deviation 153-01 was developed to precisely document that the repair procedure was applicable to repair work starting from the inner wall. This procedure deviation was approved by Bechtel Construction Management on August 21, 1975. Following this approval, work was resumed on the Reactor Coolant Pump 1B1 Casing Repairs.

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In the future, both B&W and Bechtel will exercise more care in the development, approval and use of B&W Field Construction Procedures so that the procedures fully apply to the work being performed.

Yours truly,

A handwritten signature in cursive script that reads "Lowell E. Roe". The signature is written in dark ink and is positioned above the typed name.

Lowell E. Roe  
Vice President  
Facilities Development

LER/mkn