

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 1000  
ARLINGTON, TEXAS 76012

30 APR 1980

MEMORANDUM FOR: G. W. Reinmuth, AD, DRCI, Hqs.  
FROM: Uldis Potapovs, Chief, VIB, RIV  
SUBJECT: GUIDANCE REGARDING PART 21 CITATION - BECHTEL, LA

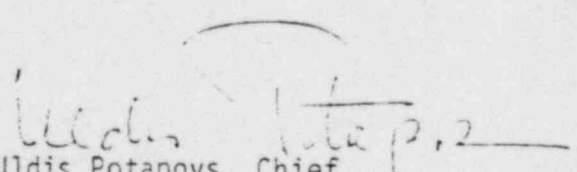
Attached is a copy of the Bechtel-Los Angeles response to an infraction identified in our inspection report No. 99900521/80-01. Bechtel does not believe Part 21 applies since the defects were detected before the systems were delivered to the customer for acceptance.

Briefly, Bechtel audits identified design defects on drawings issued for construction. Corrective action was initiated, however, no Part 21 evaluation was made since construction had not delivered the systems to the customer for acceptance although a 50.55(e) report was issued by the utility.

It is our view that Bechtel engineering's completion of their design, and issuance of the drawings for construction use, constituted delivery of the item, thus making applicable the evaluation and reporting requirements of Part 21.

As further interest and possible bearing on your assessment, Bechtel has both the design and construction scope for this project and both activities are included in a single contract with the customer.

We are requesting guidance relative to the appropriateness and accuracy of our finding. We would appreciate a timely response to this request so we may complete our efforts concerning this specific finding and so we may be better prepared if a similar problem is encountered during our other inspections.

  
Uldis Potapovs, Chief  
Vendor Inspection Branch

Attachment: as stated  
cc: R. H. Brickley, RIV  
C. J. Hale, RIV

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