



UNITED STATES

NUCLEAR REGULATORY COMMISSION

RECEIVED DISTRIBUTION REGION IV  
SERVICES UNIT  
611 RYAN PLAZA DRIVE, SUITE 1000  
ARLINGTON, TEXAS 76011

Docket No. 99900727, 90-01 3 12 09 NOV 1980

Keene Corporation  
Ray Proof Division  
Attention: Mr. Arnold M. Zais,  
President  
50 Keller Avenue  
Norwalk, Connecticut 06856

Gentlemen:

Thank you for your letters of September 30, 1980, and October 13, 1980, in response to our letter dated September 22, 1980. In regards to the apparent omission in our report, please be advised that our reports delineate only facts which are supported by objective evidence. Personal opinions and conclusions are not included in investigative reports. With reference to your comment concerning Mr. Herr's statement during the exit interview, Mr. Herr recalls that he advised Mr. Yff that individual B claimed that he (individual B) did not intend to falsify records. The available evidence indicates that falsification knowingly and willingly occurred. No conclusions have been drawn concerning intent.

Concerning your belief that the report should not be placed in the Public Document Room because it deals with nonsafety related work, not subject to the requirements of the Nuclear Regulatory Commission (NRC), please be advised, that evidence was reviewed which demonstrated that the welders involved performed tack and production welding on your job number N-2467 for a component specifically designed and manufactured for Washington Public Power Supply System, for installation at WPPSS #2 Reactors 3 & 5. Therefore, neither the report or your correspondence relating thereto, can be withheld from the Public Document Room, except as provided for under Section 2.790 of the Code of Federal Regulations, Part 2, Title 10. The procedure for requesting withholding of information under these rules was stated in our letter of September 22, 1980.

You should also be aware that Part 21 of Title 10 of the Code of Federal Regulation, requires individual directors or responsible officers of firms constructing, owning, operating, or supplying the components for any nuclear facility to evaluate the safety significance of identified deviations to products or services supplied under this regulation or to advise the purchasers of these products and services of such deviations so that they may perform such evaluation. Deviations which are determined to be defects as defined by this regulation must be promptly reported to the NRC. Specific guidance concerning this regulation is found in NUREG-0302, Revision 1, copies of which may be obtained from the National Technical Information Service, Springfield, Virginia, 22161.

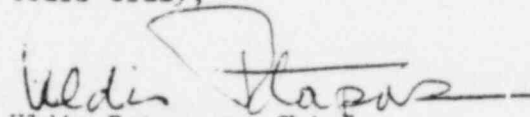
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Keene Corporation

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If you should have any questions concerning the above, we will be pleased to discuss them with you.

Yours truly,

  
Uldis Potapovs, Chief  
Vendor Inspection Branch