

July 10, 2003

Mr. M. S. Tuckman
Executive Vice President
Duke Energy Corporation
526 South Church St
Charlotte, NC 28201-1006

SUBJECT: CATAWBA NUCLEAR STATION, UNITS 1 AND 2, MCGUIRE NUCLEAR STATION, UNITS 1 AND 2 AND OCONEE NUCLEAR STATION, UNITS 1, 2 AND 3 RE: NUCLEAR QUALITY ASSURANCE PROGRAM, AMENDMENT 32 (TAC NOS. MB7166, MB7167, MB7168, MB7169, MB7170, MB7171 AND MB7172)

Dear Mr. Tuckman:

By letter dated December 18, 2002, as supplemented by letter dated April 24, 2003, the Duke Energy Corporation submitted amendment number 32 to its Duke Energy Corporation Topical Report, Duke-1-A, on the Quality Assurance (QA) Program for the Oconee, McGuire, and Catawba Nuclear Stations. We have continued our review of the amendment to your QA Program and have identified a further need for additional information as discussed in the Enclosure. We discussed these issues with your staff on June 19, 2003. Please provide a response at the earliest practical time to enable our timely completion of the review.

Please contact me at (301) 415-1493, if you have any other questions on these issues.

Sincerely,

/RA/

Robert E. Martin, Senior Project Manager
Project Directorate II, Section 1
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-413, 50-414, 50-369, 50-370, 50-269, 50-270 and 50-287

Enclosure: Request for Additional Information

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION
REGARDING QUALITY ASSURANCE PLAN REVISION
DUKE POWER COMPANY
WILLIAM B. MCGUIRE NUCLEAR STATION, UNIT 2
DOCKET NOS. 50-369 AND 50-370
CATAWBA NUCLEAR STATION UNITS 1 AND 2
DOCKET NO. 50-413 AND 50-414
OCONEE NUCLEAR STATION UNITS 1, 2 AND 3
DOCKET NOS. 50-269, 50-270 AND 50-287

BACKGROUND

On December 18, 2002, the Duke Power Company (Duke, licensee) requested that the Nuclear Regulatory Commission (NRC) staff review and approve Amendment 32 of its Nuclear Quality Assurance Program (referred to as Topical Report). This amendment to the Topical Report includes a reduction in commitment with respect to hold point inspections for routine maintenance activities. The proposed alternative would eliminate hold point inspections by substitution of an indirect monitoring process. The NRC staff requested additional information in a letter dated April 4, 2003, and Duke responded to that request in its letter dated April 24, 2003. This further request for additional information (RAI) is based on the NRC staff's review of Duke's letter dated April 24, 2003, and on discussions held with Duke on June 19, 2003.

The information provided to date does not adequately or clearly describe the scope of activities to which the proposed alternative would apply. In addition, the description of the monitoring process is neither specific nor robust enough to demonstrate that process monitoring will maintain a level of control comparable to hold point inspections. As discussed during the June 19, 2003, telephone conference, the NRC staff needs further clarification for the following three areas: (1) a clearer definition of the scope of activities to which process monitoring would be applied, (2) a description of the elements of the selection process, and (3) a description of the proposed monitoring process.

A. Topical Report Definitions of Maintenance:

Define the following terms for inclusion in the topical report: (1) maintenance, (2) routine maintenance, and (3) non-routine maintenance; these will be used to determine the activities that will require hold point inspections or activities requiring process monitoring. Include a more complete list of clarifying examples for routine and non-routine maintenance (e.g., routine maintenance might include torquing, restoration, oil change; non-routine maintenance might include work on valve actuators or diesel generator overhaul).

Consider the following working definitions provided by the NRC staff in developing your response:

Maintenance consists of those activities necessary to maintain or restore systems to within specified design limits.

Routine maintenance consists of repair, rework, replacement, adjustment, cleaning or other actions necessary to maintain an item to acceptable conditions and is performed by trained and qualified personnel in accordance with documented procedures and/or instructions.

Non-routine maintenance activities are intended to change specified design limits, such as modifications. Non-routine maintenance includes maintenance that may be routine, but is performed by personnel who may not have the requisite training and qualification to perform the activity without supervisory oversight, or a first time evolution performed in an operating plant environment. Non-routine maintenance includes American Society of Mechanical Engineer (ASME) Section XI Code activities, special processes, civil activities, and modifications.

- B. Topical Report Description of Elements of the Selection Process Used to Determine Routine Maintenance Activities that will be Controlled Through Process Monitoring:
1. Clarify that determination of routine maintenance activities to be controlled through process monitoring is procedurally administered through the review of existing or new model work orders, that this is accomplished by qualified personnel, and that this determination is a one-time process for a given task.
 2. The draft quality process monitoring procedure, QAM-3, included with the licensee's response to the letter dated April 24, 2003, states that maintenance tasks coded with a Quality Control (QC) determination code QC P are activities associated with routine maintenance and that QC hold points for maintenance procedures are not applicable; however, the maintenance activity is a candidate for process monitoring. This statement suggests that inspections (both hold point and process monitoring) for activities coded QC P could be eliminated. Clarify that QC determination code P means that hold point inspections are required unless the activity is selected for process monitoring. Provide specific clarification on how activities coded QC P that are not determined to be candidates for process monitoring are controlled.
 3. The checklist for selecting activities for process monitoring needs to be more specific and robust. Provide additional checklist details such that: (1) the NRC staff can understand how the process is applied, and (2) knowledgeable persons using the checklist for the same activity or similar activities would arrive at the same conclusion as to selecting process monitoring to control a selected activity.

4. Define the qualifications of the personnel making the routine maintenance determinations (American Nuclear Society (ANS) standard 3.1 or equivalent). Include specific commitments in the topical report for training required for personnel including planners, maintenance and QC personnel who would select activities to be controlled through process monitoring.

C. Topical Report Description of Process Monitoring Elements

The definition of Quality Process Monitoring, provided in the draft procedure QAM-3, attached to the licensee's response dated April 24, 2003, states that Quality Process Monitoring (Process Monitoring) is monitoring or direct observation to verify whether an item or activity conforms to specified requirements. Provide specific clarification on the determination process, the criteria used, how the determination is documented in the work package, and what actions are taken when an item or activity does not conform.

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Catawba Nuclear Station
Oconee Nuclear Station

cc:

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