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 50-369 William B. McGuire Nuclear Station, Unit 1, Duke Powe 05000369  
 50-413 Catawba Nuclear Station, Unit 1, Duke Power Co. 05000413  
 50-414 Catawba Nuclear Station, Unit 2, Duke Power Co. 05000414

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 RECIP. NAME RECIPIENT AFFILIATION  
 GRACE, J. N. Region 2, Ofc of the Director

SUBJECT: Forwards 871020 comments on evaluation of SALP rept for facilities. Rept adequately represents quality of performance at stations.

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NOTES: 4 4

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November 30, 1987

Dr. J. Nelson Grace, Regional Administrator  
U. S. Nuclear Regulatory Commission  
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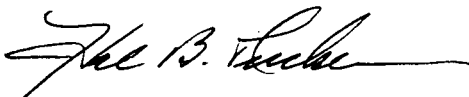
Subject: IE Inspection Report Nos. 50-269/87-33  
50-270/87-33  
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50-413/87-26  
50-414/87-26

Dear Sir:

By letter dated October 20, 1987, NRC transmitted the Systematic Assessment of Licensee Performance (SALP) report for Oconee, McGuire and Catawba. Meetings were held to discuss these reports on October 27 and October 29 at the respective stations. Attached please find our comments on these evaluations. Although we agree with the ratings in these particular categories, we do consider that these comments are necessary to clarify certain statements contained in the SALP reports.

We believe that on the whole, these SALP reports adequately represent the quality of performance at our stations as clarified by our comments in the attachment. We will continue to factor in the observations by the NRC in the SALP reports and subsequent meetings in our overall efforts to further improve performance at our nuclear stations.

Very truly yours,



Hal B. Tucker

NAR/1036/sbn

Attachments

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PDR ADDCK 05000269  
Q PDR

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Duke Power Company  
Comments On SALP Report Dated October 20, 1987

STATION: Oconee

SALP CATEGORY: Engineering Support

DUKE COMMENT:

This section of the report accurately reflects Oconee's performance except for the discussion regarding the Unit 1 reactor vessel flange-to-shell weld indications discovered by ultrasonic testing. The SALP report indicates that there was a reluctance on the part of Duke to take additional steps to resolve technical issues following the discovery of the ultrasonic indications in the Unit 1 Reactor Vessel. The SALP report states that the licensee, following meetings with the NRC, agreed to perform additional review of the ultrasonic procedures using the mockup reactor vessel at the Babcock and Wilcox Mount Vernon facility. We have reviewed a chronology of events concerning this issue. In our opinion, the NRC statements within the SALP report appear to be inconsistent with the chronology. In support, we offer the following brief synopsis:

| <u>Date</u> | <u>Discussion</u>   |
|-------------|---|
| 03/21/86    | Preliminary evaluation of the ultrasonic testing data indicates the possibility of flaws in the Unit 1 Reactor Vessel flange-to-shell area. The evaluation could not, with reasonable certainty, conclude that the indications were geometric reflectors, thus they were treated as flaws.  |
| 03/27/86    | Preliminary testing performed on the mockup reactor vessel at the Mount Vernon facility.  |
| 04/03/86    | Notification of April 8, 1986 meeting in Atlanta was received with request for information.   |
| 04/08/86    | First meeting with NRC staff in Atlanta where Duke presented details of the inspection, evaluation, results and conclusions including preliminary information of a program at the Mount Vernon facility concerning the development of ultrasonic testing techniques for future inspections. |

In summary, the NRC statements in the SALP report implies we were reluctant to take additional steps to resolve this technical issue. We consider that the chronology shows 1) the flaw indications were treated conservatively, 2) research had already started at Mount Vernon and that 3) we were committing at the Atlanta meeting to continue such research.

STATION: Catawba

SALP CATEGORY: Quality Programs and Administrative Controls Affecting Quality

DUKE COMMENT:

Duke does not take issue with the rating of this functional area based on the understanding that NRC Region II requires consistent category 1 ratings in other functional areas to be rated category 1 in this area. However, we do believe the analysis of this area relies too heavily on the technical capability of the Quality Assurance organization itself. This section of the SALP appears to be heavily influenced by the results of an NRC quality verification organization inspection conducted late in the SALP period. This inspection report was received by Duke in mid November. Comments on that report apply here as well and are being forwarded separately.

As stated in the SALP report, our emphasis on achieving quality is within the line organizations; therefore, technical resources are maintained in these line organizations. This does not mean that Duke believes its QA organization does not need technical capability or credibility. However, it does lead to line organizations seeking out their problems and solving them, without waiting on or relying to heavily on the QA organization to perform this function.

We recognize that the comprehensiveness and effectiveness of QA audits conducted in technically oriented areas is a direct function of the technical awareness of personnel performing and leading those audits. To achieve this needed level of technical expertise, the Duke Audit group routinely obtains technical expertise, from other line or staff organizations to provide this awareness to specific audit teams. Duke is perhaps better able than most utilities to do this and maintain independence from the audited organization, since we have a Design Engineering Department and seven operating units at three different locations. Thus a chemistry specialist or SRO from one location can be utilized as a member of an audit team at another location. Approximately 70% of the audits conducted during this SALP period utilized technical expertise in this manner to not only help identify technical difficulties, but to aid in evaluating the deficiencies found by others on the audit team.

In addition to utilization of technical experts from outside the audit group, Duke recognized the need to provide training to auditors in the nuclear operations area. Accordingly, in June 1985, a training program to provide detailed technical training to auditors was developed and implemented.

This training program consists of a total of 71 weeks of training, involving 41 weeks of classroom instruction at the Technical Training Center and 30 weeks of On-the-Job Training. The training consists of New Engineer/Professional On-the-Job Training, Task Inventory Program Training, Basic Thermodynamics and Nuclear Physics, Basic Operator Training, Health Physics and Chemistry Group On-the-Job Training, and Basic Operator Training.

The utilization of technical experts from outside QA and the training program described above resulted in a total of 23 technical issues identified by QA departmental audits. These audits were conducted at the Catawba Nuclear Station during the period of January 1, 1985 through July 1, 1987 in such areas as Health Physics, Chemistry, Independent Verification Activities, and Surveillance Testing. The number of technical issues raised constitute approximately 30% of all items identified at Catawba during this period. These figures indicate that a significant number of technical issues were identified by QA departmental audits.

Site QA surveillance personnel undergo 46 weeks of Basic Nuclear Operator Training and 8 weeks of System Specific Training. Additional classroom instruction and On-the-Job Training is provided in the areas of their specialization. The involvement of QA department employees in the operations of the plant will increase as a result of the training provided.

In regard to the Catawba Unit 2 Startup test program, QA surveillance provided coverage of start up activities through the tour surveillance program. The tour surveillance program was specifically designed to be observational and impromptu in nature. These tour surveillances are documented and did provide many checks on fuel load, precritical checks and power ascension. We feel that the NRC gave little or no credit for these tour surveillances.

The SALP Board recommended increased management attention to scope and depth of inspections, findings and effective resolution of those findings. Duke management has taken several initiatives to strengthen QA involvement. The training programs described above involve significant resources over a long period of time and indicate a commitment to long term improvement in the technical education of audit and surveillance personnel. The initiation of a formal Quality Assurance Performance Assessment (QAPA) procedure recognizes a need to focus QA attention more heavily on performance problems and less on programmatic coverage. A major initiative in the area of improving technical auditing ability is our Self Initiated Technical Audit (SITA) program. This program provides for an audit team composed solely of technical experts selected by upper management. It incorporates many of the features of the NRC Safety System Functional Inspection (SSFI) program. It is not tied to programmatic compliance by regulation and is administered by experienced QA Lead Auditors. Catawba is scheduled to have such an audit in 1988.

Our use of technical experts in regular QA audits will continue. The source of technical expertise within Duke is perhaps more substantial than within most utilities; therefore, the need to maintain highly specialized technical personnel in the QA organization is, in our opinion, decreased.

While the above initiatives indicate our commitment to increase and improve its technical abilities within QA, we will still emphasize line management's responsibility for quality. This includes actively seeking out problem areas and working toward solutions irrespective of how, or by whom, the problem was identified. The Testing Task Force originated by line management at Catawba during this period is an example of this philosophy. This emphasis, coupled with the initiatives to improve technical abilities within QA, points out the importance our management attaches to the functional area of Quality Programs.

STATION: Catawba

SALP CATEGORY: Preoperational And Startup Testing (Unit 2)

DUKE COMMENT:

The last paragraph states that "there appeared to be no management supplied impetus to completing the test program".

There was a clear management-supplied directive not to put the plant through any unnecessary transients just for the sake of expediting completion of the test

program. The adequate response of plant systems to full power trips had been previously demonstrated, so there was no safety concern in delaying the Unit Loss of Electrical Load Test. Our approach was to wait for more opportune periods when this test could be completed.

STATION: Oconee, McGuire and Catawba

SALP CATEGORY: Licensing

DUKE COMMENT:

Statements are made in these sections that experienced individuals in the Licensing Staff seem to be overburdened and that Licensing seems to be the training ground for newcomers who have not been indoctrinated in the regulatory environment. While it is true that any staff may be overburdened during periods of unusual regulatory activity, Duke's Licensing Staff does possess a depth of experienced personnel. The 17 technical personnel in Licensing have an average of 10 years nuclear experience, 5.5 years of which is Licensing experience. Only 6 of the 17 Licensing personnel were hired directly into Licensing with no prior nuclear experience.