

July 20, 1992

**Responses To June 30, 1992
NRC Request For Clarification
Duke Power Company Quality Assurance Topical Report
Amendment 15**

NRC Item 1. Request for additional information (RAI) 6 (and others) was asked in order to obtain a clearer understanding whether the scope of Duke Power Company's graded QA program meets NRC requirements and guidance. The response is acceptable in that a clear commitment to meet NRC's QA guidance for nonmetallic insulation for austenitic stainless steel and protective coatings has been added to Table 17.0-1. It is unacceptable in that these items are apparently not classified as QA Condition _____ where _____ is a designation such that quality is ensured commensurate with the item's importance to safety. They should be. Other items (such as ATWS equipment, safety parameter display systems, and the nonsafety-related items referred to in 10CFR 50.65(b)(2)) should be similarly classified and controlled. "QA Condition 1" appears to be as limiting as "nuclear safety-related" and changing from one term to the other does not really help our understanding. Please clarify.

Response

As discussed with Frank Jape and Jack Spraul in the conference call on July 14, 1992 our position is as follows:

We believe that we are in compliance with all regulatory guidance issued to date on the items mentioned. As described in the Topical Report, our graded QA Program does not contain any other categories than QA Conditions 1, 2, 3, and 4. ATWS is considered non-safety related and is described as a separate category in each station's respective Quality Standards Manual. This manual and other controlling procedures define the systems and components related to ATWS at a level that those personnel involved know the requirements and controls necessary to maintain the integrity of this equipment. Coatings are considered QA Condition 1 if designated as Service Level 1 (inside containment) and controls exist from procurement to the point of installation and inspection. Service levels other than Service Level 1 are treated as non-safety related. Coatings are considered a special process and controls are described in documents such as procurement specifications, the Nuclear Coatings Maintenance Manual and QC Inspection Procedures. Non-metallic pipe insulation is classified as non-safety related. Controls for non-metallic pipe insulation are described in the Power Chemistry Manual and are in accordance with Regulatory Guide 1.36. We are aware of the Maintenance Rule as described in 10CFR 50.65 (b)(2), are tracking industry initiatives, and awaiting the publication of Regulatory Guidance on this subject. At this point, we believe it premature to make any modifications to our program to

address the Maintenance Rule. Our intentions are to be in compliance with the law on or before the required implementation date.

NRC Item 2. The response to RAI 27 indicates that an appropriate way to address SRP criteria C.2.c, d, e, and f is in the specific sections where they apply. This is acceptable to the staff. However, in light of the dashes (indicating no commitments) and the P's (indicating partial commitment) in the matrix below, consideration should be given as to whether these criteria should be applied to more functions than currently indicated. Please clarify.

<u>FUNCTION/CRITERION</u>	C.2.c	C.2.d	C.2.e	C.2.f
NSRB	-	-	-	-
Internal Audits	P	X	X	X
Safety Assurance	-	-	X	P
Corporate Audits	P	-	-	X
Int. Safety Assessments	-	-	-	P
Self-Initiated T. Audits	P	-	-	P
Vendors	P	-	-	P

Response

We have re-visited the criteria stated in Section C.2 of Standard Review Plan 17.3 and our interpretation of how we meet sections C.2.c, C.2.d, C.2.e and C.2.f is noted below:

<u>FUNCTION/CRITERION</u>	C.2.c	C.2.d	C.2.e	C.2.f
NSRB	X	X	-	X
Internal Audits	X	X	X	X
Safety Assurance	P	X	X	P
Corporate Audits	X	X	-	X
Int. Safety Assessments	P	P	-	P
Self-Initiated T. Audits	P	X	X	X
Vendors	X	X	X	P

We have also reviewed our discussions of the various Self-Assessment programs described in 17.3.3 and have added some additional wording which should clarify our position in sections 17.3.3.2.1 and 17.3.3.2.6. These additions are noted in **BOLD TYPE**. Further, it must be understood that each individual Self-Assessment activity will not encompass all of the criteria listed in C.2 of the Standard Review Plan. However, when reviewed as a complete program, we believe that the overall Self-Assessment program meets all of the criteria described in Section C.2 of Standard Review Plan 17.3.

NRC Item 3. The responses to RAI's 13 (first sentence), 15, 18, 19, 21, (last sentence), and 23 should be included in the topical report. Please consider adding.

Response

The portions of the responses requested to be added to the Topical Report have been incorporated as noted :

Response Number

Topical Section

13	17.3.2.14, new paragraph (#10)
15	17.3.2.4, new paragraph (#2)
18	17.3.2.4, new paragraph (#3)
19	17.3.2.4, new paragraph (#11)
21	17.3.2.6, new sentence in 4th paragraph
23	17.3.2.9, new paragraph (#3)

These additions are noted in ***BOLD TYPE***.