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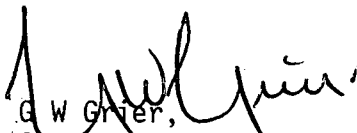
June 14, 1985

Dr. J. Nelson Grace
U.S. Nuclear Regulatory Commission
Region II
101 Marietta St., Suite 3100
Atlanta, GA 30303

Dear Dr. Grace:

Enclosed is one signed original of Amendment Nine to the Duke Power Company Topical Report, Quality Assurance, Duke-1. Amendment Nine includes proposed changes to our position on Regulatory Guides 1.58 and 1.144, and clarification of Sections 17.1.18.3 and 17.2.12(c). The explanation for each change is addressed in Enclosure 1.

Respectively submitted,


G. W. Grier,
Corporate QA Manager.
BRJ

cc w/Encl: J C Bryant
P H Skinner
P K VanDoorn
W T Orders
C M Upright
Document Control Desk

Enclosure 1: Explanation of Proposed Changes
Enclosure 2: Topical Report, Amendment Nine

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Enclosure 1
Explanation of Proposed Changes to Duke Power
Company's Topical Report

REGULATORY GUIDE 1.58

CHANGE: Add to remarks the following "Also, Duke's Level I Inspectors receive a minimum of 4 months experience as Level I prior to being certified as Level II, in lieu of one year experience recommended by ANSI N45.2.6."

REASON: Our Certification Program requires all candidates for certification to Level I or Level II meet certain requirements which include:

- (1) Evidence of acceptable education,
- (2) Evidence of required experience (includes O-J-T),
- (3) Classroom training in the specific certification category as well as administrative procedures and guidelines,
- (4) Successful completion of a written examination(s), and
- (5) Successful completion of a practical examination(s).

Each candidate must satisfy all of the above requirements before being allowed to perform any inspection activities. In addition, the Level I inspectors are monitored (documented monthly) by a Level II inspector to verify adequate performance capabilities.

The above requirements exceed those recommended by Section 2.2 of ANSI N45.2.6-1978 which are:

"The capabilities of a candidate for certification shall be initially determined by suitable evaluation of the candidates education, experience, training, test results, or capability demonstration."

ANSI allows options for certification determination and our program establishes all the options as mandatory requirements.

Our program is established to verify the candidate's knowledge of the activity (training and written examination) and performance of the activity (practical examination). If the candidate can successfully demonstrate his ability to function in the required capacity, the duration of experience becomes a secondary consideration for certification.

REGULATORY GUIDE 1.144

CHANGE: Revise remarks statement to read, "RG 1.144 incorporates ANSI N45.2.12 (1977). Duke Program conforms to ANSI N45.2.12-1977 for internal/external audits except Section 4.4.6 for external audits. In lieu of making recommendations for correcting program deficiencies and distributing audit reports to the audited organization, we will identify to the audited organization the results of the audits

including identified deficiencies. Also, the reevaluation may be extended to 15 months as described in Section 17.1.7.1.1.

REASON: This change was made to clarify our position with respect to Regulatory Guide 1.144.

Section 17.1.18.3 (page 17.1-34)

CHANGE: Revise sentence two of paragraph one to read "This audit is performed every 12 months on the Quality . . ."

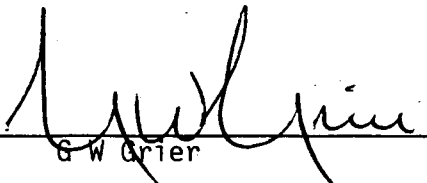
REASON: This change was made to clarify that the corporate audits are every 12 months, which is a more definite timeframe than once a year.

Section 17.2.12(c) (page 17.2-19)

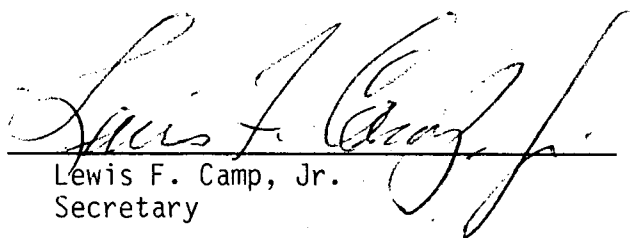
CHANGE: Revise first sentence to read "devices that have . . . are affixed, were practical, with a tag . . .". Also add as the last sentence "When attaching tags is not practical, the device is traceable by unique identification to the applicable calibration records."

REASON: This change is being made because all devices which are calibrated may not be of sufficient size to affix a calibration tag. All of our calibration devices have unique identification which is traceable to the calibration records. These devices are controlled and calibration status verified prior to use.

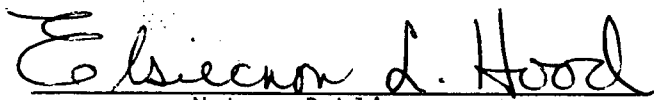
G W Grier being duly sworn states that he is Corporate Quality Assurance Manager of Duke Power Company; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission this amendment to its Topical Report - Duke 1-A; and that all statements and matters set forth herein are true and correct to the best of his knowledge.


G W Grier

ATTEST:


Lewis F. Camp, Jr.
Secretary

Subscribed and sworn to me this 14th day of June, 1985.


Ediechon L. Hood
Notary Public

My commission expires: Sept. 24, 1985
Date