

DUKE POWER COMPANY

POWER BUILDING

422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28242

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

June 12, 1981

TELEPHONE: AREA 704
373-4083

Mr. James P. O'Reilly, Director
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

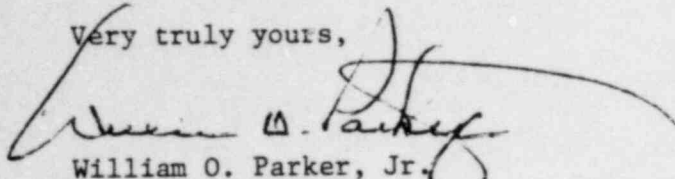
Re: RII: PKV
50-413/81-08
50-414/81-08

Dear Mr. O'Reilly:

Please find attached a response to Infraction Nos. 413-414/81-08-01 and 81-08-03 as identified in the above referenced Inspection Report. Duke Power Company does not consider any information contained in this inspection report to be proprietary.

I declare under penalty of perjury, that the statements set forth herein are true and correct to the best of my knowledge.

Very truly yours,


William O. Parker, Jr.

RWO/djs
Attachment

cc: NRC Resident Inspector
Catawba Nuclear Station

8107240467 810706
PDR ADOCK 05000413
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Duke Power Company
Catawba Nuclear Station

Violation:

10 CFR 50, Appendix B, Criterion V as implemented by Topical Report Duke 1-A, Section 17, paragraph 17.1.5 requires that activities affecting quality be prescribed by documented instructions, procedures or drawings.

Contrary to the above, instructions, procedures or drawings were not provided to control clearance between installed piping systems and components resulting in the following:

1. On July 25, 1980, Duke Class E liquid waste and recycle system pipe 1WL-647-17 was close enough to ASME Class B refueling water system valve 1FW-47 that, when operated, the valve position indicator contacts the pipe.
2. On July 25, 1980, ASME Class B steam generator blowdown and recycle system pipe upstream of weld No. 1BB-10-15 was in contact with a Duke Class E liquid waste and recycle system pipe.
3. On March 18, 1981, nonsafety-related hanger No. 1-C-WL-66546 was in contact with the operator of ASME Class A chemical and volume control system valve INV11-3.

Response:

As stated in the notice of violation, there was not a clearance criteria in use in the field during the period the noted examples were erected. The clearance criteria which would prevent contact of items such as those cited in the examples was incorporated into Drawing CN-1680-48 which was received on site March 6, 1981. This criteria has become part of our inspection criteria which is used during configuration inspections required by QA Procedure M-8.

On March 27, 1981, Construction Procedure 602 established piping clearance guidelines for craft personnel. These guidelines should prevent any future clearance problems as systems are erected.

Prior to final system turnover, the Catawba Stress Analysis Group will walk down all systems with design conditions above 220°F to look for potential problems.

A system thermal expansion test for all seismic systems above 200°F will be performed. This test is presently being added to the FSAR under Section 3.9.2 and in Chapter 14. This test will insure that no contact occurs between systems/structures in the hot condition.

In summary, adequate clearance criteria is available. Inspections and tests performed pursuant to this criteria should preclude any clearance problems. The three specific examples cited will be non-conformed and corrected by August 15, 1981.

Violation:

10 CFR 50, Appendix B, Criterion XIII as implemented by Topical Report Duke 1-A, Section 17, paragraph 17.1.13 requires that measures be established to control storage of material to prevent deterioration. Duke Quality Assurance Procedure P-3, Rev. 12, requires material storage levels to be in accordance with ANSI N45.2.2. which states that precision machined parts will be stored indoors and protected from temperature extremes, humidity and physical damage.

Contrary to the above, measures to control storage of material to prevent deterioration had not been established on April 3, 1981, for precision machined flow sections in that indoor storage was not required. This resulted in numerous flow sections being stored outdoors where they have acquired varying degrees of rust on the machined surface. Examples are Tag Nos. 2RN58BB, 2RN99-10, 2RN101CC, 2RN205CC and 2RN205DD.

Response:

The flow sections were being stored outdoors in the prefabricated pipe laydown area. This was documented on Nonconforming Item Report 11571. As a result, Construction Procedure 132, Installation of Flow Sections, Revision 11, was written to require Level C storage for the flow sections. An additional inspection requirement was also added to Construction Procedure 132, Revision 10, to check surface conditions at fit-up during the installation process. Presently, all carbon steel flow sections have been relocated to Level C storage; however, the stainless steel sections have not, due to lack of sufficient storage area.

We will have an area available and properly store the stainless steel sections by June 15, 1981. Upon completion of this activity, NCI 11571 will be completed.