

DUKE POWER COMPANY
POWER BUILDING
422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28242

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

TELEPHONE: AREA 704
373-4083

August 19, 1981

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

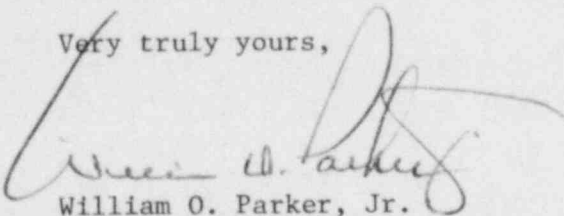
Re: RII: PKV
50-413/81-14
50-414/81-14

Dear Mr. O'Reilly:

Please find attached a response to Infraction No. 413-414/81-14-01 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.

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Attachment

cc: NRC Resident Inspector
Catawba Nuclear Station

DUKE POWER COMPANY
CATAWBA NUCLEAR STATION
RESPONSE TO VIOLATION

USNRC IE REPORTS 50-413/81-14 and 50-414/81-14

VIOLATION

As a result of the inspection conducted on May 26 - June 25, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violation was identified.

10CFR 50, Appendix B, Criterion V, as implemented by Topical Report Duke 1-A, Section 17, paragraph 17.1.16 requires that activities affecting quality shall be prescribed by procedures of a type appropriate to the circumstances. Construction QA procedure Q-1 describes actions to be taken to correct nonconforming items, to determine the cause, and to prevent repetition.

Contrary to the above, on June 18, 1981, procedure Q-1 did not properly address determination of cause for significant conditions adverse to quality on June 18, 1981. This resulted in the inadequate specification of corrective action for Nonconforming Item Report No. 11746 which identified root weld defects for Class C Weld Nos. INV343-1, INV344-1 and INV341-1. Corrective action specified was only to repair the three welds identified and did not address the cause of the condition nor corrective action to preclude repetition.

RESPONSE

1. We admit that procedure Q-1 was incomplete. However our personnel had been trained and were aware of the need to address generic considerations and to take corrective action to preclude repetition of significant conditions adverse to quality.
2. The specific occurrence cited in the violation occurred because corrective action had already been initiated for the condition identified on Nonconforming Item Report (NCI) No. 11,746 in the form of revised inspection procedures. Since the corrective action had been initiated, repair of the welds in question was specified without restating the corrective action. Additionally, because the condition was judged to be insignificant, generic research into the cause was not considered necessary at that time.

3. The corrective steps already taken include:
 - a. The personnel involved have been cautioned of the need for proper evaluation of significance and cause when resolving nonconformances.
 - b. The resolution of NCI 11,746 has been rewritten to require further evaluation of this type condition by Design Engineering.
4. Corrective steps which will be taken are to revise QA procedure Q-1 and other appropriate procedures to require, for significant conditions adverse to quality, the cause to be investigated and determined to the extent practical and consistent with the occurrence and corrective action to be specified on the resolution to the nonconformance.
5. Full compliance will be achieved by October 1, 1981.