

USNRC  
DUKE POWER COMPANY  
POWER BUILDING

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

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WILLIAM O. PARKER, JR.  
VICE PRESIDENT  
STEAM PRODUCTION

TELEPHONE: AREA 704  
373-4083

August 26, 1981

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

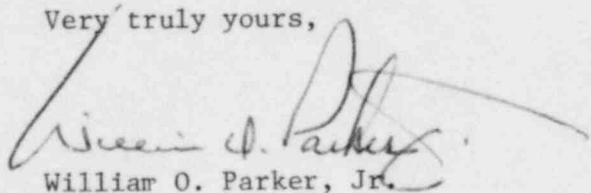
Re: RII:LDZ  
50-413/81-16  
50-414/81-16

Dear Mr. O'Reilly:

Please find attached a response to Violation No. 413, 414/81-16-01 which was identified in the above referenced Inspection Report. Duke Power Company does not consider any information contained in this 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/php  
Attachment

cc: NRC Resident Inspector  
Catawba Nuclear Station

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Response to Violation 413, 414/81-16-01

"Failure to follow procedures for the control of surface applied material"

Violation - 10 CFR 50, Appendix B Criterion V, as implemented by Topical Report Duke 1-A, Section 17, paragraph 17.1.5, requires activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Licensee's procedure CP-170 prohibits contact of stainless steel with low melting metals such as lead, and procedure CP-479 permits only approved tape to be in direct contact with austenitic stainless steel.

Contrary to the above, on July 17, 1981, lead numbers in direct contact with stainless steel reactor coolant piping joints 2NC-9-3 and 2NC-9-7 of Unit 2 were sighted. In addition, the lead numbers on joint 2NC-9-3 were affixed to the pipe surface with an unapproved tape.

Response

1. The lead numbers described by this violation were placed adjacent to welds 2NC-9-3 and 2NC-9-7 by Quality Control Inspectors while performing radiography of repairs to these welds. Upon completion of radiography the numbers were inadvertently not removed.
2. The use of bare lead letters was not prohibited by CP-170 until revision 10 dated 7-9-81. The date of issue of CP-170 (7-9-81) and the date of this violation (7-17-81) indicate that this error was due to unfamiliarity with new requirements. It should be noted that radiography of original welds is performed using a band of marker which does prohibit direct contact.

The use of unapproved masking tape was due to failure to follow established procedures.

3. Immediately after discovery of this violation, nonconformance reports 12206 and 12221 were written to describe the bare lead letters and unapproved tape problems. Training was immediately conducted and the use of masking tape was immediately discontinued. Since the initial retraining one recurrence of one bare lead number has been noted. The recurrence is described on nonconformance 12412. Additional formal, documented training has now been conducted for all radiography personnel. No additional problems have been observed since the documented training occurred.
4. This item will be monitored to assure continued compliance.
5. All nonconformances related to this problem will be cleared by November 1, 1981. Corrective actions to date will prohibit any further recurrence.