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
50-413/81-08
50-414/81-08

Dear Mr. O'Reilly:

In regard to Violation 413-414/81-08-03, failure to control storage and protection of flow sections to prevent deterioration, an engineering evaluation has been conducted to evaluate the effects of rust degradation on erected carbon steel flow sections. The following describes the results of this evaluation.

Flow orifice plates have been and will continue to be installed in accordance with Construction Quality Assurance Procedures M-10 and M-24. Construction Procedure 132 describes the fabrication of flow sections containing flow metering orifice plates, flow nozzles, or venturis. Procedure M-10 covers the inspection requirements along with material criteria for all flow sections.

Procedure M-24 describes the cleanness acceptance criteria in which a quality control inspector visually inspects the internal surface of items being joined. By Section 6.2 of Procedure M-24 carbon steel surfaces must meet the following requirement:

> Thin uniform rust films are acceptable. The following types are not acceptable:
>
> 1. Hard rust (rust which forms in a crusty film and tends to break off in flakes or pieces.)
>
> 2. Heavy rust (a continuous film of appreciable thickness which forms due to lengthy exposure to aerated water or condensed moisture)

Since all flow sections at Catawba Nuclear Station have been installed in accordance with Construction Procedure M-24, any rust degradation on the carbon steel flow sections would be of the thin uniform rust film type.

The accuracy efforts of a thin layer of rust were discussed with various flow meter vendors. All agree that the upstream and downstream sections essentially maintained their smoothness and are not affected by a thin layer of rust. The error resulting from rust would not exceed one-half of a percent of total flow and is acceptable for adequate system performance. Therefore, the effects of rust degradation on installed sections are minimal and will not alter the acceptability of the measurements.

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

cc: NRC Resident Inspector
Catawba Nuclear Station

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July 15, 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
50-413/81-08
50-414/81-08

Dear Mr. O'Reilly:

In regard to Violation 413-414/81-08-03 identified in the above referenced Inspection Report, an evaluation of the possible deterioration of flow sections that have been installed in the permanent locations is being conducted. This evaluation will be concluded and a final response will be provided by September 18, 1981.

Very truly yours,

William O. Parker, Jr.

RWO/php

cc: NRC Resident Inspector
Catawba Nuclear Station