

yellow

DUKE POWER COMPANY

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HAL B. TUCKER  
VICE PRESIDENT  
NUCLEAR PRODUCTION

August 9, 1983

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RECEIVED  
NRC REGION I

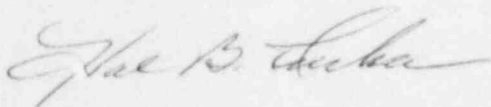
Mr. James P. O'Reilly, Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30303

Re: RII:PKV  
50-413/83-12  
50-414/83-12

Dear Mr. O'Reilly:

Please find attached a response to Violation No. 413/83-12-01 as identified in the above referenced inspection report. Duke Power Company does not consider any information contained in this inspection report to be proprietary.

Very truly yours,



Hal B. Tucker

RWO/php

Attachment

cc: NRC Resident Inspector  
Catawba Nuclear Station

Mr. Robert Guild, Esq.  
Attorney-at-Law  
P. O. Box 12097  
Charleston, South Carolina 29412

Palmetto Alliance  
2135½ Devine Street  
Columbia, South Carolina 29205

Duke Power Company  
Catawba Nuclear Station

Violation: 10 CFR 50, Appendix B, Criterion V, as implemented by Topical Report Duke 1A, Section 17, paragraph 17.1.5 requires that activities affecting quality be accomplished in accordance with established drawings. Duke Power Company Drawing No. 1CS-A-20.3, Rev. 6 requires that functionally redundant safety class instrument lines for nuclear safety related instruments meet the physical separation criterion of 18-inches minimum.

Contrary to the above, an activity affecting quality was not accomplished in accordance with established drawings on April 13, 1983 in that the installed safety class instrument lines for nuclear safety related instrument Loop Nos. 1SM511 and 1SM514 were found to be separated by several inches rather than by the minimum required 18-inches.

Response:

1. The impulse lines for 1SM511 and 1SM514 did not meet the physical separation requirements of 1CS-A-20.3.
2. The failure by Construction to install these impulse lines in accordance with the requirements of 1CS-A-20.3 was due to a misunderstanding between Design Engineering and Construction as to the method of notification of separation requirements. The impulse line separation criterion of 1CS-A-20.3 is given in definition form which requires Construction to make an interpretation in order to implement the requirements. It was Construction's expectation that the specific applicability of the criteria of 1CS-A-20.3 would be specified on the instrument installation details for all loops requiring separation of impulse lines. This was not done as Design Engineering thought an agreement had been reached with Construction that the criterion of 1CS-A-20.3 was sufficient in itself.
3. Based on further review by Construction, NCI 16667 was issued addressing loops 1SM511 and 1SM514 and the following additional loops which were identified as being in violation of 1CS-A-20.3: 1SM508, 1SM509, 1SM511, 1SM512, 1SM514, 1SM515, 1SM517, 1SM518, 1VA500, 1VA502, 1KC563, 1KC564, 1NC516, 1NC517, 1ND504, 1ND505, 1NV574, and 1NV607. The impulse lines for these loops will be rerouted as required to meet the criteria of 1CS-A-20.3 in order to resolve this nonconforming item report. As a result of the problems identified above, Design Engineering has conducted a complete review of impulse line separation requirements and has begun origination of drawings CN-1499-M152.00, .01, .02, .03 and .04 which provide a detailed listing of the specific applicability of 1CS-A-20.3. Also, a revision to 1CS-A-20.3 has been initiated to reference these drawings for applicability of the criteria. Based on the results of this review, loops 1SM510, 1SM513, 1SM516 and 1SM519 were also identified as violating 1CS-A-20.3. All rework required to resolve these discrepancies will be initiated by Construction upon receipt of the CN-1499-M152 series drawings.

4. The issue of the CN-1499-M152 series drawings and revision to LCS-A-20.3 to address specific separation requirements will assure that all impulse line separation requirements are properly documented and implemented in the field. No interpretation of criteria will be required of Construction. In order to improve communication between Design Engineering and Construction I&C personnel, a program has been initiated to conduct a weekly Design Engineering/Constuction interface meeting. This program consists of a weekly visit by Design Engineering to the field location to observe installation practices and to discuss any Construction problems or concerns. These meetings should improve communications and prevent the recurrence of problems of this nature.
5. The weekly Design Engineering/Construction interface meetings are already in progress. The CN-1499-M152 series drawings will be issued and subsequent rework and reinspection will be completed by October 1, 1983.