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USNRC REGION
AT
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02 AUG 30 AIO . 03
August 20, 1982

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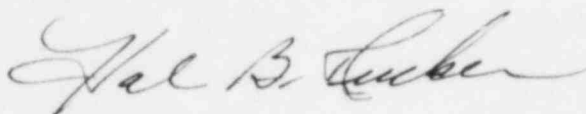
Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Re: RII:PKV
50-413/82-10
50-414/82-04

Dear Mr. O'Reilly:

Please find attached a response to Violation No. 413/82-10-02, 414/82-04-02 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: Mr. P. K. Van Doorn
NRC Resident Inspector
Catawba Nuclear Station

Mr. Robert Guild, Esq.
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314 Pall Mall
Columbia, South Carolina 29201

Palmetto Alliance
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Duke Power Company
Catawba Nuclear Station

Violation:

10CFR50, Appendix B, Criterion V, as implemented by Topical Report Duke 1-A, Section 17, paragraph 17.1.5 requires that activities affecting quality be accomplished in accordance with established procedures. Duke Power Company procedure CQAP Q1, Rev. 16 requires disposition of Nonconforming Item Reports (NCI's) to be clear, complete, and contain proper technical content.

Contrary to the above, NCI No. 13,781 which pertains to licensee inspection findings of Class A pressurizer relief valves was found to be inadequate on April 8, 1982. The disposition of NCI No. 13,781 was not accomplished in accordance with established procedures in that the licensee appears to accept defects rejectable by the ASME Code and did not submit vendor evaluation.

Response:

1. Duke Power Company admits this violation.
2. The reason for this violation is that Duke's Nonconforming Item form (Disposition of Nonconformance section) was used to provide instructions, to Duke's Construction Department, that are "stated clearly and in sufficient detail to allow appropriate personnel to assign action to implement disposition" (Duke's Design Engineering QA procedure PR-220). 10CFR50, Appendix B Criterion XVI evaluation was not documented sufficiently in the original NCI resolution.
3. Attachment 1 is a more complete documentation of NCI 13781 evaluation and resolution milestone activities. Attachment 1 demonstrates that Duke's technical evaluation was adequate and that Criterion XVI documentation is now in compliance with procedures.
4. To assure that adequate evaluation is performed for NCI's, Duke Power Company QA procedures have been revised and personnel trained to provide both the technical and Criterion XVI evaluation documentation required.
5. Full compliance has been achieved as of this date, August 20, 1982.

NCI 13781 Disposition/Resolution Milestone Activities

- 1/20/82 - Design Engineering Responsible Engineer received NCI 13781.
- 1/21/82 - Responsible Engineer gave copy of NCI to QA Vendors Group. The Senior QA Supervisor, Vendors, discussed NCI with QA Manager, Vendors.
- 1/22/82 - QA Vendors Group examined valves at Catawba. (See Vendor Surveillance Report dated February 11, 1982).
- 1/25/82 - QA Vendors Group advised Responsible Engineer that indications described in the NCI were surface indications and would not require major repairs. QA Vendors Group advised Responsible Engineer that these indications did not violate Vendor's QA Program.
- 1/29/82 - The Responsible Engineer and his supervisor examined valves at Catawba. They concluded that indications described in the NCI were surface indications and would not require major repairs. They could not determine whether or not these indications were evident on the valves when they left the vendor's shop.
- 2/1/82 - The Responsible Engineer and his immediate supervisor reviewed the Vendor QA documentation packages for these valves with the Duke QA Level III NDE Inspector. After reviewing the radiographic film of valve bodies, Duke QA Level III NDE Inspector concluded that the RT film did not show any relevant indications.
- 2/2/82 - QA Vendors Group re-examined valves at Catawba. They measured the depth of the large, ground area on the body of Valve INC33A and determined that the required minimum wall thickness had not been violated. They also reviewed vendor RT film of these valves and concluded that no relevant indications were present.
- 2/4/82 - Duke QA Level III NDE Inspector examined these valves at Catawba with the Responsible Engineer and his supervisor. The Inspector concluded that indications described in NCI were surface indications. The crack was reclassified as a linear surface indication. He agreed that since these surface indications did not violate the required minimum wall thickness, they would not require major repairs.

Duke QA Level III NDE Inspector also believed that the small amount of "slag" material on the non-pressure boundary flange to body weld of these valves would not have masked any indications during the Vendor's liquid penetrant examination. Further, when the Unit 2 valves in the warehouse were examined by the Duke QA Level III NDE Inspector, the "slag" material was not present.

- 2/10/82 - Responsible Engineer wrote original resolution to NCI. Since (a) the required minimum wall thickness of the valves had not been violated, (b) the "crack" was reclassified as a linear surface indication, and (c) the "slag" material apparently did not invalidate the Vendor's liquid penetrant examination, he concluded that neither the Vendor's QA Program nor the ASME Section III Code had been violated.

Since surface indications are routinely removed from N-stamped components, Responsible Engineer gave Construction an eight step procedure for removing indications on these valves.

- 2/11/82 - NC† approved by Design Engineering and QA.
- 2/22/82 - Duke QA Level III NDE Inspector re-examined these valves with original QC Inspector. Using a magnifying glass, he observed several small linear indications in one area approximately one inch from bottom of body on the west side of Valve INC31B. He advised Responsible Engineer that Construction Department should perform liquid penetrant examination of these indications. Duke QA Level III NDE Inspector determined that the "slag" material on the flange to body welds was unacceptable. He advised Responsible Engineer that Construction should remove this "slag" material and perform liquid penetrant examinations of these welds.
- 2/25/82 - Responsible Engineer called Vendor and informed them of this NCI and the above actions. Vendor stated that they were not aware of any QA Program or ASME Section III Code violations on these valves. Vendor had performed a full body RT and a liquid penetrant examination of these valves. No rejectable indications were found. Vendor had cleaned the flange-to-body welds and performed a liquid penetrant examination of these welds. No rejectable indications were found. Vendor confirmed that they had followed their approved procedures.
- 3/3/82 - Vendor's ANI and representative inspected these valves. They did not observe anything on these valves that violated their QA Program or the ASME Section III Code.
- 3/10/82 - Responsible Engineer wrote Revision 1 to Resolution of NCI which provided Construction with a procedure to evaluate small, linear indications in one area on bottom of Valve INC31B. This procedure included liquid penetrant examination of this one area. Revision 1 also provided Construction with a procedure to remove the "slag" material from body to flange welds and to perform a liquid penetrant examination of these welds. Construction was instructed to report their findings to Responsible Engineer.

3/11/82 - NCI Disposition, Revision 1, approved by Design Engineering.

3/12/82 - NCI Disposition, Revision 1, approved by QA.

5/13/82 - Project QA wrote letter to Responsible Engineer and QA Technical Services providing Construction's findings per Revision 1 to Resolution of NCI.

After removing the "slag" material from flange to body welds, Construction's liquid penetrant examinations indicated that these welds are acceptable confirming original Vendor's liquid penetrant examinations.

Construction performed liquid penetrant examinations of each valve body. They found seven areas on these valves that had rejectable surface indications. The disparity in the results of two PT examinations can be attributed to solvent removable liquid penetrant method used by Duke Power is more sensitive than post-emulsification liquid penetrant method used by Vendor, and the handling and installation of valves.

5/27/82 - Responsible Engineer and his supervisor called Vendor. Vendor stated that the "slag" material may have been masking compound. Vendor re-emphasized that they had not violated their QA Program or the ASME Section III Code.

6/3/82 - Design Engineering and QA Department personnel met with Resident NRC Inspector at Catawba to discuss NRC's 5/14/82 letter. The NRC Inspector made the following comments:

- (1) ASME Code rejectable defects such as "cracks" and "slag on welds" should be addressed individually in disposition of NCI.
- (2) When NCI description implies Vendor related problems, Vendor QA Program should be evaluated and documented in disposition of NCI.
- (3) The disposition of the NCI should be more definitive in resolving ASME Code rejectable items.

6/24/82 - The Responsible Engineer requested Vendors to complete the Criterion XVI evaluation on seven areas of rejectable indications on these valves.

7/1/82 - QA Vendors Group wrote a letter to Responsible Engineer stating Criterion XVI Evaluation of seven areas of rejectable indications on these valves. They confirmed that there was not a breakdown in Vendor's QA Program.

7/2/82 - Responsible Engineer wrote Revision 3 to Resolution of NCI. This resolution provided Construction with procedure to investigate seven areas of rejectable indications on these valves. This procedure was in accordance with ASME Section III Code for removal and examination of surface defects.

7/6/82 - NCI Disposition, Revision 3, approved by Design Engineering and QA.

7/27/82 - Construction removed the rejectable indications per procedure in NCI, Disposition, Revision 3. All indications were removed with 1/16 inch deep grind except indications in one area. Construction requested permission to remove another 1/16 inch deep in this one area.

Responsible Engineer provided NCI Disposition, Revision 4, to allow Construction to remove additional 1/16 inch deep in this one area. This additional grind did not violate required minimum wall thickness.

NCI Disposition, Revision 4, approved by Design Engineering and QA.

7/28/82.- Construction removed last of rejectable indications with additional 1/16 inch deep grind in this one area. The required valve minimum wall thickness was not violated in any of seven areas. Construction issued Form F-10A on repair of these indications.