

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

March 18, 1982

TELEPHONE: AREA 704
373-4083

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

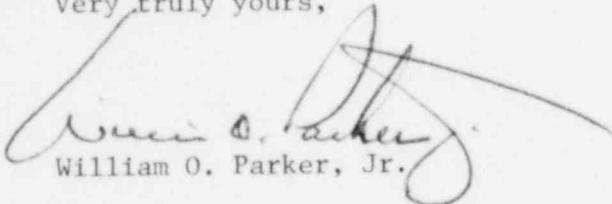
Re: RII:PKV
50-413/82-03
50-414/82-03

Dear Mr. O'Reilly:

Please find attached a response to Violation Nos. 413/82-03-03 and 413/82-03-04 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.

RWO/php
Attachment

cc: Mr. P. K. Van Doorn
NRC Resident Inspector
Catawba Nuclear Station

Mr. Robert Guild, Esq.

Palmetto Alliance

Duke Power Company
Catawba Nuclear Station

Violation:

10 CFR 50, 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. Licensee procedure CQAP M18, Rev. 8 requires a structural steel fabrication and erection inspection report (Form M18A) for safety-related structures.

Contrary to the above, structural modifications were not being performed on Spent Fuel Pool Gates 1A and 1B in accordance with the established procedure on January 6, 1982 in that inspection Form M18A was not issued and the required structural inspections were not performed.

Response:

1. Duke admits that Quality Assurance Form M-18A was not issued for the structural modifications on Spent Fuel Pool Gates 1A and 1B on January 6, 1982.
2. The Spent Fuel Pool Gates 1A and 1B were considered to be a vendor's component and not structural steel. It was decided to use QAP F-10 (Process Control for Alteration or Repair of Code Stamped Items) since it was felt F-10 requirements would adequately document this modification. Process Control Forms (F-10As) were issued. One of the inspections required was a check of the gates for dimensions and alignment based on allowable tolerances specified on Design Engineering drawings. We felt that this inspection along with the welding inspections required by Quality Assurance Procedure M-21 (Inspection of Field Welding of Structural Steel, Miscellaneous Steel and Other Steel Construction for QA Condition Structures) were adequate and an additional Quality Assurance Procedure M-18 (Inspection of Structural Steel Fabrication and Erection) inspection was not required.
3. The process control forms (Form F-10As) have been revised to indicate Quality Assurance Procedure M-18 is required for structural inspection and the appropriate M-18A forms have been issued.
4. All the appropriate Quality Assurance and Technical Support personnel shall be advised that M-18A forms are required for all QA Condition Structural Steel Modifications in addition to other process control requirements.
5. This training will be complete by April 15, 1982.

Violation:

10 CFR 50, 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. Licensee Procedure CP-479, Rev. 4 prohibits use of graphite type pencils on stainless steel material.

Contrary to the above, marking on stainless steel was not accomplished in accordance with the established procedure on January 20, 1981 in that numerous graphite type pencil marks were present on installed safety-related 12-inch stainless steel pipe identified on ISO Drawing No. 1ND43.

Response:

1. Duke admits that graphite type pencils were used on installed safety-related 12-inch stainless steel pipe identified on ISO Drawing No. 1ND43 as documented on Non-Conforming Item Report No. 13,838.
2. The violation was due to a thoughtless act.
3. The graphite type pencil markings have been removed by cleaning from the stainless steel and verified by a "patch test" as indicated on NCI No. 13838.
4. In order to avoid any further violations, all of the appropriate craft personnel have been trained as documented on NCI No. 13360 in the requirements of CP-479. Any future marking violations discovered will be resolved on a case by case basis.
5. Full compliance to the requirements of Construction Procedure CP-479 has been achieved. We are presently reevaluating the requirements specified in CP-479 to determine if a change in scope is necessary. Based on this reevaluation, we shall determine if any additional inspections and cleaning of stainless steel piping are necessary due to the generic implications. This reevaluation shall be completed no later than September 1, 1982. A schedule for additional inspections and cleaning, if deemed necessary by our reevaluation, will be provided no later than December 1, 1982.