

**DUKE POWER COMPANY**

P.O. BOX 33189  
CHARLOTTE, N.C. 28242

HAL B. TUCKER  
VICE PRESIDENT  
NUCLEAR PRODUCTION

TELEPHONE  
(704) 373-4531

22 DEC 21 AIO. 31  
December 17, 1982

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

Subject: Oconee Nuclear Station  
IE Inspection Report  
50-269/82-40  
50-270/82-40  
50-287/82-40

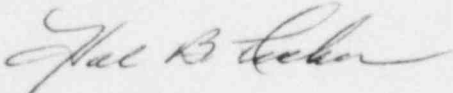
Dear Sir:

With regard to Mr. H. C. Dance's letter of November 17, 1982 which transmitted the subject inspection report, Duke Power Company does not consider the information contained therein to be proprietary.

Please find the attached response to the cited items of noncompliance.

I declare under penalty of perjury that the statements set forth herein are true and correct to the best of my knowledge, executed on December 17, 1982.

Very truly yours,



Hal B. Tucker

JCP/php  
Attachment

### Violation

10 CFR 50, Appendix B Criterion V and the accepted QA Program Section 17.2.5 require that activities affecting quality be prescribed by documented procedures. For the purpose of delineating the program description of 10 CFR 50, Appendix B Criterion XIII and Section 17.2.13 of the program, the accepted QA Program commits to Regulatory Guide 1.38, Revision 2, Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage and Handling of Items for Water-Cooled Nuclear Power Plants. Regulatory Guide 1.38, Revision 2 endorses ANSI N45.2.2 - 1972.

Contrary to the above, activities affecting quality have not been prescribed by documented procedures in that methods used to implement various sections of ANSI N45.2.2 - 1972 have not been described in licensee procedures. A specific example is the entire Section 3 of ANSI N45.2.2 - 1972. This example is representative and not all-inclusive.

This is a Severity Level V Violation (Supplement I).

### Response

- 1) Admission or denial of the alleged violation:

This violation is correct as stated.

- 2) Reasons for the violation:

This violation resulted from administrative deficiency. Although the various requirements of ANSI N45.2.2 - 1972 were being implemented, all of the methods used to implement the requirements had not been included in procedures used by the station materials section.

- 3) Corrective actions taken and results:

A review of the requirements of ANSI N45.2.2 - 1972 has been completed. A list of requirements in this standard not covered by station procedures has been developed.

- 4) Corrective actions to be taken to avoid further violations:

Station procedures will be revised or written, as necessary, to implement all requirements of N45.2.2 - 1972.

- 5) Date when full compliance will be achieved:

The corrective action noted in (4) above will be completed and implemented By January 1, 1983.