

DUKE POWER COMPANY

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HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

TELEPHONE
(704) 373-4531

January 23, 1984

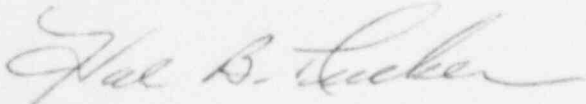
Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30303

Re: RII:NE
50-413/83-36
50-414/83-31

Dear Mr. O'Reilly:

My letter of January 13, 1984 transmitting the revised response to Violation No. 413/83-36-01, 414/83-31-01 was sent with an incorrect attachment. Please disregard my letter of January 13, 1984 and find attached to this letter a copy of the correct violation response.

Very truly yours,



Hal B. Tucker

LTP/php

Attachment

cc: NRC Resident Inspector
Catawba Nuclear Station

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Q PDR

January 10, 1984

Substitute the response below for the previous response (A)

Violation 413/83-36-01
414/83-31-01

- A. 10CFR50, Appendix B, Criterion II as implemented by Duke Power Company Topical Report "Duke 1-A" Section 17, Paragraph 17.1.2 requires that the Quality Assurance Program be in compliance with applicable regulations, codes, and standards. Applicable standard ANSI N45.2 states in part that the Quality Assurance Program shall contain provisions to assure identification of, and compliance with requirements of pertinent ANSI and other recognized and appropriate engineering codes, standards, requirements, and practices. ANSI N45.2.6 requires that the responsible organization identify any special physical characteristics needed in the performance of each activity and shall have them verified by examination at intervals not to exceed one year.

Contrary to the above, the contractor's (BAHNSON) QA Program did not meet the above requirements in that quality control implementing procedures QCI-2001-CNS Revision 0 and QCI-9.001 Revision 0 contained no provision for annual eye examination for QC inspectors performing visual examination of safety-related welds.

RESPONSE

1. We admit the violation.
2. Cause of violation was failure to provide adequate controls to effectively implement appropriate requirements of Bahnson's QA program. The requirement for eye exam for visual Welding Inspectors was not incorporated on Bahnson Inspection Procedures.
3. Action taken was to change Bahnson procedure to require annual eye exam for all visual Welding Inspectors. All inspectors have completed this eye exam and passed the exam.
4. Duke Power and Bahnson have conducted an in depth review of the Bahnson QA Program to determine required corrective action. In addition to the absence of procedures for eye exams we identified the following discrepancies.
 - (a) Bahnson had not been required by contract to meet applicable portions of N45.2.6. This contractual deficiency will be corrected by 3/15/84.
 - (b) Bahnson's procedure for recertification of inspectors was found deficient. This procedure will be corrected by 2/15/84.

In addition, to assure there are no other instances where Duke contracted site erection inspection fails to meet applicable codes and standards, we have taken the following actions.

- (a) Duke's QAP F-14 will be upgraded to provide a specific checkpoint for compliance with applicable portions of 2.6 for all site erection in-

specifications. The revised procedure will be in place by 2/15/84.

(b) Other vendors who may be currently providing site erection inspection will be audited for compliance by 2/15/84.

5. All action will be completed by 3/15/84.