

DUKE POWER COMPANY

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HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

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84 MAR 2 All : 39 March 27, 1984

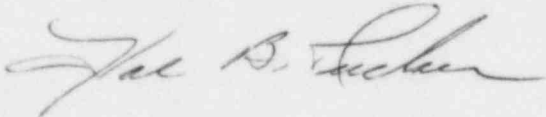
Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30303

Re: RII:WPA
50-413/84-17

Dear Mr. O'Reilly:

Please find attached a response to Violation No. 413/84-17-01, 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

LTP/php

Attachment

cc: NRC Resident Inspector
Catawba Nuclear Station

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Duke Power Company
Catawba Nuclear Station
Response to Violation No. 413/84-17-01

JPO/HBT/LTP
March 27, 1984

Violation

10 CFR 50 Appendix "B" Criterion V as implemented by Duke Power Company (DPC) Topical Report 1A requires that activities affecting quality shall be accomplished in accordance with instructions, procedures or drawings.

1. DPC Drawing Number CN-1080-3 Revision 17 requires plate assemblies MK.P9 to have four bolts with a nut on both ends of the bolt. The drawing further requires that the nuts be "Snug Tight."
2. Construction Procedure (CP) 668 Revision 3 requires all structural items under scope of QA Procedure (QAP) M-18 erected prior to August 1979 and that had not been inspected in accordance with QAP M-18 be inspected in accordance with CP-668.

Contrary to the above:

1. On November 19, 1982, two MK P9 baseplates were observed to have one nut missing per plate.
2. On February 9, 1984, the licensee informed the NRC inspector by copy of Nonconforming Item (NCI) Report No. 16744 that in response to the NRC inspection finding, five additional missing or loose nuts were identified on MK P9 assemblies and two improperly installed (no tack weld) nuts were identified on MK P73 assemblies.
3. The MK P9 baseplates were erected prior to August 1979. NCI 16744 reported that MK P9 assemblies and MK P13 assemblies did not receive QAP M-18 or CP-668 required inspections.

Response

1. Duke Power Company admits the violation as stated.
2. The reason the violation occurred is that the assemblies identified above were shown on concrete drawings; however, concrete drawings were not used to complete the list of M-18 backfit items.
3. The corrective steps which have been taken are:
 - A. Nuts on assemblies P9 and 2P9 have been tightened and inspected.
 - B. Work on the P73 assemblies have been completed and inspected.
 - C. QA Condition structural steel and concrete drawings have been reviewed to identify any other items that need to be inspected. All items requiring inspection will be completed by May 25, 1984.
 - D. In addition, a random sample of structures containing previously inspected fasteners were reinspected. One structure was found

to have loose expansion anchors. Based on this information, we have a 95% confidence level that structures erected and inspected to QAP M-18 do not have missing/loose fasteners. The one discrepant structure has been reworked and reinspected.

4. Additional corrective actions have been taken to avoid future violations. These actions are:
 - A. Craftsmen have been instructed not to remove nuts from completed/inspected assemblies without proper process control.
 - B. Construction Procedure for the Fabrication, Erection, and Inspection of Structural Steel has been revised to provide additional instructions to craft and inspectors. The revision provides a method to report missing/loose fasteners on completed work.
 - C. New drawing revisions issued to Construction are being reviewed to detect additional steel assemblies which may have been added.
 - D. Prior to turnover a walkdown of completed structures will be performed to check for obvious problems such as missing bolts or damaged members.
5. Full compliance will be achieved by May 25, 1984.