

DUKE POWER COMPANY

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HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

84 APR 12 410:26
April 5, 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:WHM
50-413/84-11
50-414/84-07

Dear Mr. O'Reilly:

Please find attached a response to Unresolved Item No. 413/84-11-06, 414/84-07-06, as requested 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

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 Unresolved Item No. 413/84-11-06, 414/84-07-16

1. The Standby Shutdown System consists of several subsystems as well as the Turbine Driven Auxiliary Feedwater System (which is nuclear safety-related, i.e., QA Condition 1). The subsystems consist of various mechanical and electrical components and devices which are not directly associated with fire suppression or detection items; therefore, procurement and installation are not considered to be within the scope of the Fire Protection Quality Assurance Program.

When the system is turned over to Nuclear Production, preoperational tests are conducted to ensure that the system functions as designed. The continuing reliability of these subsystems will be assured by conducted surveillance requirements as specified in the Catawba Technical Specifications. These tests and any required maintenance are conducted according to established station procedures and administrative controls. These operational test and maintenance activities will be subject to audits and surveillance conducted by the Quality Assurance Department.

2. Emergency 8 hour battery powered lighting units and the fire brigade breathing air system are examples of components which are purchased to industry standards but are not within the scope of the Fire Protection Program. When these items are installed, functional tests are conducted by appropriate Nuclear Production station groups to assure the items function properly.
3. Hangers and supports which do not provide seismic restraint are not within the scope of the Fire Protection Quality Assurance Program. These are construction "typical" hangers which are conservatively designed as long as the system is not nuclear safety-related (QA Condition 1) or does not provide seismic restraint (QA Condition 4). These hangers are designed for various pipe diameters and are generally capable of supporting up to 20 feet of pipe. When used in the fire protection system (RF), hanger spacing is reduced to comply with NFPA 13-1978, thereby providing additional conservatism. Functional tests are utilized to assure the items function properly.
4. NFPA 13-1978 requires that pipe meet provisions of ANSI/A53 or A53. All pipe used at Catawba for fire protection meets ANSI/A53 or A106. A106 requires that pipe be seamless (which is optional under A53) and requires that pipe have higher allowable working stress than A53. Therefore, the grade of pipe used at Catawba exceeds minimum requirements of the National Fire Code.

In addition, pipe used in Duke design portions of fire protection systems is reviewed by the Construction Technical Support Group to determine that pipe issued for installation meets the appropriate pipe specification for type, grade, and schedule being erected. Vendor

design package systems are reviewed by Warehouse personnel upon receipt and separated by requisition. The package is issued for installation by shop number which must match the requisition number. Therefore, the crew erecting a system has appropriate piping for installation.

The only example of special coating protection used at Catawba is the carbon dioxide system buried carbon steel pipe which is coated for corrosion protection. Resolution is as discussed in response to Unresolved Item 413/84-11-04. The next revision of the Duke Power Fire Protection Acceptance Specification, which defines requirements of the Fire Protection Quality Assurance Program, will include provisions for inspection of protective coating of underground piping when installed.

5. Fire detection and alarm systems electrical installation, i.e., cable pulls, termination, splices, etc., are not inspected and documented under the Quality Assurance Program. When the installation is complete, a functional test is conducted to assure that the system is operational. Successful completion of the functional test assures that installation of the system is acceptable.
6. Construction flush and hydrostatic testing procedures were reviewed during this inspection. Preoperational tests of fixed gas suppression and fire detection systems are conducted by Station Nuclear Production, I&E or Performance Groups. Results will be available for review during future inspections.