

**DUKE POWER COMPANY**

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March 22, 1984  
84 MAR 2 All: 41

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:PKV/PHS  
50-413/83-55  
50-414/83-41

Dear Mr. O'Reilly:

Please find attached a response to Violation No. 413/83-55-01, 414/83-41-01, 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*  
EIT

Hal B. Tucker

LTP/php

Attachment

cc: NRC Resident Inspector  
Catawba Nuclear Station

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Attorney-at-Law  
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Charleston, South Carolina 29412

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Q PDR

Response to Violation 413/83-55-01 and 414/83-41-01

- a) We admit the violation.
- b) This violation was caused by Quality Assurance Procedures QA-140 and NDE-B not clearly identifying the requirements; however, our practice meets these requirements as stated below:
  - Item 1) Our current practice is to require a minimum of six months experience prior to being certified to Level I. We require an additional twelve months experience as a Level I Inspector prior to being certified as Level II. We do not normally certify anyone directly to Level II, but when we do, they meet the three year experience criteria.
  - Item 2) We are revising our Procedure QA-140 to require the Level III Examiner have related experience in equivalent inspection, examination, or testing activities. Additionally we are reviewing the certifications of all Level III Examiners for compliance with the requirements of our revised procedure and will address any variance found.
  - Item 3) We require the Level III Examiner, certified to our Procedure NDE-B, to have a practical demonstration of proficiency. Both the Level III Welding and Level III ISI have documented evidence of required capability. These Level III Examiners meet the requirements of SNT-TC-1A.
- c) Procedures QA-140 and NDE-B are being revised to clearly address the requirements of ANSI N45.2.6 and SNT-TC-1A respectively.
- d) The implementation of the revisions to QA-140 and NDE-B will avoid further violations of the nature.
- e) Full compliance will be achieved by June 15, 1984.

Response to Other Inspection Report Items Identified in Paragraph 8

- Item 1) Level I Inspectors evaluating the validity and acceptability of inspections, examinations, and test results.

Response: ANSI N45.2.6-1978, Table I, allows the Level I Inspector to implement procedures. The Level I inspector implements the procedure and records the results. These procedures define the acceptable limits (provided by Design Engineering) for a particular function. The Level I Inspector records the information on the inspection report and forwards the report to site Quality Assurance for approval. If the results are outside the specified limits, the inspector initiates the necessary corrective action documentation which is evaluated by other Departments (Construction, Design Engineering, or Nuclear Production). The Level I Inspector performs no evaluation of results and does not accept any inspection where the criteria are not specifically defined.

- Item 2) Education and Experience requirements do not reflect ANSI N45.2.6-1978 requirements.

Response: In our commitment to Regulatory Guide 1.58 we state we will require inspector candidates have a minimum of a High School diploma or GED equivalent. The experience in Table I of our Procedure QA-140 was based on this minimum education and the understanding that to be certified as Level II the inspector must first be certified as Level I. Therefore, our practice meets the intent of ANSI N45.2.6 and our upcoming revision to Procedure QA-140 will more clearly define this practice.

- Item 3) QA-140 states examinations for the Level III Examiner are not required except for the Level III ISI Visual Examiner. Reference (c), SNT-TC-1A, discussed the examination criteria for a Level III Examiner.

Response: The Level III ISI Visual Examiner is currently the only Level III Examiner under the scope of Procedure QA-140 which must meet the certification criteria established by SNT-TC-1A.

- Item 4) The use of "limited level" inspectors is not addressed in ANSI N45.2.6 or SNT-TC-1A.

Response: Our Topical Report is being revised to address these inspectors. The limited certification is a method employed whereby inspectors are allowed to perform limited functions within a category. These inspectors are tested and certified to those limitations. The inspectors are allowed to perform only inspections specifically defined in the limited certification.