

DUKE POWER COMPANY

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HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

APR 12 10:26
April 6, 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:PKV/PHS
50-413/83-56
50-414/83-42

Dear Mr. O'Reilly:

Please find attached a response to Violation No. 413/83-56-03, 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

Hal B. Tucker *by PHB*

LTP/php

Attachment

cc: NRC Resident Inspector
Catawba Nuclear Station

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DUKE POWER COMPANY
CATAWBA NUCLEAR STATION
Item 413/83-56-03

Violation

10 CFR 50, Appendix B, Criterion V as implemented by Duke Power Company QA Topical Report Duke-1-A (Amendment 6), Section 17.1.5, requires that activities affecting quality be accomplished in accordance with procedures and instructions. Duke Construction QA Procedure R6, Rev. 1, Significant Corrective Action, requires evaluations to include a determination of the root cause of problems and a determination of generic implications. Duke Construction QA Procedure Q1, Rev. 15, requires evaluations of non-conforming items to be complete and to address the problem identified.

Contrary to the above, nonconformance item reports were inadequately evaluated as indicated in the instances cited below:

- A. On January 13, 1984, the inspector determined that the evaluation of electrical cable radius bend problems identified on R6A No. 352 failed to identify the actual root cause of the problem and stated that the problem was not generic and was non-repetitive when in fact, the problem was both generic and repetitive.
- B. The evaluation of NCI No. 13,522 was found to be incomplete on January 4, 1984, in that it did not address previous work performed by a craft person who had falsified material traceability for a hanger.

Response

- A. 1. We admit Part A of the violation.
- 2. The cause of the violation was failure to perform the Criterion XVI evaluation of the cable radius violation in the generic sense. Instead, the evaluation only considered the problem stated on the NCIR: "Violation of cable bend radius specifications over motor control centers." Review of the evaluation by the Construction Department Criterion XVI Coordinator failed to detect this error. The evaluation was then approved.
- 3. A subsequent re-evaluation of the cable bend radii throughout the plant has found violation of the radius criteria to be a generic problem. To correct this problem the following steps have been implemented.
 - a. All cable radii will be inspected during our final walk inspection procedure for each electrical system.
 - b. Violations noted during this inspection will be documented, corrected, or reanalyzed for acceptance.

- c. All craft personnel involved in the installation of cable will be instructed in the requirements of the installation specification (CNS-1390.01-00-0022).
- 4. To ensure proper evaluations of all significant discrepancies requiring Criterion XVI evaluation, the following actions have been taken.
 - a. Selected experienced personnel have been designated to perform these evaluations. These individuals, normally at engineer or higher levels, are responsible for conducting an investigation of the problem and writing the formal report.
 - b. A review panel has been established at the Catawba site to review all newly evaluated Criterion XVI discrepancies. This panel, which meets weekly, consists of Construction Engineers from all disciplines, QA, and Craft representatives (optional). The panel's purpose is to ensure a generic review of all evaluations and to exchange knowledge of discrepancies across disciplinary lines.
 - c. The previously mentioned steps along with the continuing presence of the department Criterion XVI Coordinator enhances our abilities to perform the Criterion XVI evaluation.
 - d. All Criterion XVI Evaluations generated prior to February 1, 1984 will be reviewed for adequate consideration of generic implications.
- 5.
 - a. Reinspection of all cable bend radii will be completed as systems are turned over to Nuclear Production.
 - b. Training of all craft personnel involved in cable installation is complete.
 - c. The Criterion XVI Evaluation review panel will begin meeting on March 2, 1984 and continue meeting until the Construction Department is assured that Criterion XVI evaluation process is properly understood and implemented by site personnel.
 - d. Review of all Criterion XVI evaluations completed prior to February 1, 1984 will be complete by June 1, 1984.
- B.
 - 1. We admit Part (B) of the violation. NCI 13522 was resolved without investigating the responsible individual's past practices.
 - 2. The cause of this violation was failure to perform a generic evaluation of this individual's past work.
 - 3. The disposition of NCI 13522 was reopened to address the individual's past practice. A specific sample of this employee's work cannot be defined for the following reason: Craft sign-off of

process control for support/restraint erection is usually performed by hanger foremen, welding foremen, and crew lead craft person(s). Since we could not sample his work, a series of interviews were conducted with fellow workers and inspectors responsible for inspecting his work. Of the individuals interviewed, no one had reason to suspect that the individual made a practice of this.

4. The review that an NCI receives now (QA Procedure Q-1) is designed to prevent reoccurrence of these type situations. No further corrective steps are required.
5. NCI 13522 has been reevaluated and closed out. Full compliance has been achieved.