

DUKE POWER COMPANY

P.O. BOX 33189
CHARLOTTE, N.C. 28242

HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

TELEPHONE
(704) 373-4531

85 APR 19 4 9:23

April 11, 1985

Dr. J. Nelson Grace, Regional Administrator
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street N.W., Suite 2900
Atlanta, Georgia 30302

Subject: McGuire Nuclear Station
Docket Nos. 50-369 and 50-370

Reference: RII:NE
NRC/OIE Inspection Report 50-369/85-05 and 50-370/85-05

Dear Dr. Grace:

Pursuant to 10 CFR 2.201, please find attached a response to violation 50-370/85-05-02 which was identified in the above referenced inspection report.

Very truly yours,

H.B. Tucker / BH

H. B. Tucker

PBN:smh

Attachment

cc: Mr. W. T. Orders
Senior Resident Inspector
McGuire Nuclear Station

8506210263 850411
PDR ADOCK 05000369
Q PDR

||
IE01

DUKE POWER COMPANY
McGUIRE NUCLEAR STATION
RESPONSE TO NRC/OIE INSPECTION REPORT 50-369/85-05 AND 50-370/85-05

Violation 50-370/85-05-02, Severity Level V (Supplement I):

10 CFR 50, Appendix B, Criterion V, as implemented by Topical Report Duke-1-A, Section 17.2.5, requires in part that activities affecting quality shall be accomplished in accordance with requirements imposed by instructions, procedures and drawings.

Station Directive 3.11 requires that combustible agents and other unnecessary materials be removed from control access areas upon completion of the task being performed.

Contrary to the above, on February 12, 1985, procedure requirements were being violated in that two cans of liquid penetrant materials and a brush applicator were found inside a control access area of the auxiliary building near the area where liquid penetrant examinations had been performed. Other materials used for this type NDE examination had been removed.

Response:

1. Admission or denial of the alleged violation:

Duke Power Company denies this violation. The area of the Auxiliary Building where the two cans of liquid penetrant materials were observed is designated as Housekeeping Level IV under McGuire Station Directive 3.11, Rev. 9. This Directive in part states:

"Level IV: Level IV cleanliness shall apply to areas in which it is desired to regulate the use of tobacco and eating for material and equipment protection or for health and fire hazards and in which control of personnel and materials is not required. All QA Conditions 1, 2, or 3 electrical work request activities are Level IV.

- A. There will be no eating, drinking, or use of tobacco products within the Level IV area.
- B. Level IV cleanliness shall be obtained by removal of all dirt and debris from an area. Cleanliness shall be maintained by placing all waste material in conveniently located trash receptacles and by not allowing waste to accumulate in the area.
- C. Level IV areas shall be marked by prominently displayed signs as per Attachment 6. QA Conditions 1, 2, or 3 electrical work request activities are exempted from these posting requirements.

Inspection of Level IV cleanliness shall be performed on a scheduled basis by a Quality Control Inspector. The QC Inspector normally verifies compliance with cleanliness requirements by signing the applicable

Maintenance procedure at various checkpoints. Discrepancies shall be recorded and reported to the Station Senior Quality Assurance Engineer or his designee. Appropriate corrective action shall be taken on any discrepancy previously reported."

The presence of two cans of penetrant materials in a Level IV Housekeeping area in which work was being performed does not violate these requirements in that they did not constitute an accumulation of waste material, but rather were supplies used to do work in the area. Even though the persons performing the work may have not been in the area at the time, the total scope of the work was not completed and the clean up of the area and the Housekeeping Inspection had not yet been performed.

2. Reasons for this violation if admitted:

Not applicable.

3. Corrective steps which have been taken and the results achieved:

Not applicable.

4. Corrective steps which will be taken to avoid further violations:

Not applicable.

5. Date when full compliance will be achieved:

The station has been in full compliance with all applicable requirements in this area.