

DUKE POWER COMPANY

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NUCLEAR PRODUCTION

TELEPHONE
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May 23, 1985

Dr. J. Nelson Grace, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Subject: Oconee Nuclear Station
IE Inspection Report
50-269/85-06
50-270/85-06
50-287/85-06

Dear Sir:

In response to your letter dated April 19, 1985 which transmitted the subject Inspection Report, the attached response to the cited items of non-compliance is provided.

Please note that by Duke letter dated May 9, 1985, the response date for the violation was delayed until May 23, 1985.

Very truly yours,

H.B. Tucker /slb

Hal B. Tucker

SGG:slb

Attachment

cc: Mr. J. C. Bryant
NRC Resident Inspector
Oconee Nuclear Station

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PDR ADOCK 05000269
Q PDR

IE01

Violation

10CFR 50, Appendix B, Criterion II as, implemented by Topical Report Duke-1-A, Section 17.2.3 requires, in part, that the QA Department review proposed modification, ... certify that quality assurance requirements have been met and determine inspection requirements prior to implementation of the modification. In addition, Section 17.2.5 requires activities affecting quality be accomplished in accordance with documents specifying conditions which must exist prior to and during performance of an activity, and include quantitative and/or qualitative acceptance criteria, compatible with applicable design specifications.

Piping Isometric 16, Part 1, Revision 19, issued by Engineering and approved by QA, for the replacement of Unit 2 Main Feedwater Flow Nozzles, specified installation per ASME Code Section III Class 3 requirements.

Contrary to these requirements, the QA organization/program failed to determine and implement inspection requirements in that welds #85, 86, 87 and 88 in the above mentioned Isometric were allowed to be fabricated without issuance of the appropriate weld control documents, without QA/QC fitup and final visual inspections being performed, and without documentation of preheat and/or interpass temperature. The licensee issued a non-conformance report No. 1232 on March 18, 1985. Similar apparent events, programatic breadowns, were identified and documented in earlier reports e.g., Inspector Followup Item 287/84-10-01, Corrective Measures on NCIs 1031 and 1203.

This is a Severity Level IV Violation (Supplement 1).

Response

- 1) Admission or denial of the alleged violation:

This violation is admitted.

- 2) Reasons for the violation if admitted:

This violation was the result of administrative/procedural deficiency. Code applications and the associated inspection requirements were not completely finalized prior to implementation of the job. However, all requirements of ANSI B31.1 Code were met during the implementation. (The final engineering determination was that ASME Section III was not applicable for this job.) It should be noted that the Non-Conforming Item Report issued by Station QA was erroneous since fitup inspection is not required by Section III.

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

Appropriate personnel, including QA/QC, responsible for implementation of the station welding program have reviewed the facts associated with this violation and are aware of the problems identified.

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

The Maintenance Directive on the welding program will be revised to require written documentation of deviation from construction codes prior to implementation.

- 5) Date when full compliance will be achieved:

The directive noted in (4) above will be revised by July 1, 1985.