

DUKE POWER COMPANY

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HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

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July 24, 1985 5 JUL 25 P11:47

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

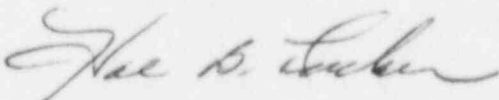
Subject: McGuire Nuclear Station
Docket Nos. 50-369 and 50-370

Reference: RII:CFS
NRC/OIE Inspection Report
Nos. 50-369/85-09
50-370/85-10

Dear Dr. Grace:

Pursuant to 10 CFR 2.201, please find attached a supplemental response to violation 50-369/85-09-01, 50-370/85-10-01 which was identified in the above referenced inspection report. This letter confirms statements made in a July 17, 1985 telephone call to Mr. H. C. Dance of your staff and completes the Duke response to this violation.

Very truly yours,



Hal B. Tucker

JSW:slb

Attachment

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

DUKE POWER COMPANY

McGuire Nuclear Station

Supplemental Response to NRC/OIE Inspection Report 50-369/85-09 and 50-370/85-10

Violation 50-369/85-09-01, 50-370/85-10-01, Severity Level IV (Supplement I):

10 CFR 50 Appendix B Criterion III and the licensee's accepted QA program Section 17.2.3 collectively require that measures be established to assure that applicable regulatory requirements are correctly translated into specifications, drawings, procedures and instructions. The QA Program endorses Regulatory Guide 1.64, Revision 2, and ANSI N45.2.11-1974, Quality Assurance Requirements for the Design of Nuclear Power Plants. Paragraph 3.2.20 of this standard states that the design input shall include test requirements including in-plant tests and the conditions under which they will be performed.

Contrary to the above, Duke's Design Engineering Department does not specify post-modification acceptance test requirements and test acceptance criteria for station modifications designed by the Design Engineering Department.

Response:

The response provided in the May 23, 1985 Duke letter remains valid. This previous letter stated that the Nuclear Production Department has controls which meet 10 CFR 50 Appendix B Criterion III, ANSI N45.2.11-1974, and Regulatory Guide 1.64 ensuring that testing criteria inputs are adequately specified. The post-modification testing requirements and test acceptance criteria referred to in this alleged violation are determined for each Nuclear Station Modification (NSM). Performance criteria, which form the basis for the acceptance criteria specified in the post-modification test procedures, are provided for each NSM designed by the Duke Design Engineering Department. This performance criteria is contained within the design drawings, manufacturer's drawings, and the specifications or requisitions developed in conjunction with an NSM. These design documents normally provide all necessary design parameters and performance parameters such as flow rates, pressures, temperatures, levels, and instrument or electrical considerations. If vendors are involved with the design or the procurement process for an NSM the Duke specifications covering these activities require that performance criteria be provided to the Design Engineering Department for transmittal as design information related to the NSM.

In accordance with 10 CFR 50 Appendix B Criterion III, Duke Power Company has designated its Nuclear Production Department as the responsible organization for implementing the post-modification testing program based upon information provided by the Design Engineering Department. The actual acceptance criteria to be used are extracted from the design documents, or other appropriate sources such as vendors or the Design Engineering Department. The post-modification acceptance criteria do not

deviate from the data contained in the design information without consultation with the Design Engineering Department. Through the above process, involving a close interface with the Design Engineering and Nuclear Production Departments, Duke Power Company does assure that adequate post-modification testing requirements and acceptance criteria are specified in accordance with the applicable regulatory requirements referenced in this alleged violation.

Based upon the information provided above and in our previous letter, Duke Power Company continues to deny this alleged violation.