

DUKE POWER COMPANY

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

HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

TELEPHONE
(704) 373-4531

September 9, 1985

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

Re: RII:ABR
50-413/85-28

Dear Dr. Grace:

Please find attached a response to Violation No. 413/85-28-02, as identified in the above referenced Inspection Report.

Very truly yours,

H.B. Tucker / HBT

Hal B. Tucker

LTP/hrp

Attachment

cc: NRC Resident Inspector
Catawba Nuclear Station

Robert Guild, Esq.
P. O. Box 12097
Charleston, South Carolina 29205

Palmetto Alliance
2135½ Devine Street
Columbia, South Carolina 29205

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Violation
414/85-28-02

10 CFR 50.54 (a)(1) requires the licensee to implement the quality assurance program described or referenced in its Safety Analysis Report. The Quality Assurance Program Topical Report Duke 1 A requires that activities affecting quality be performed in accordance with documented instructions, procedures or drawing.

Contrary to the above, the licensee failed to carry out the quality assurance program in accordance with their Construction Procedure - 438, Instrument Protection. Records required by this procedure to determine protection and maintenance requirements for instruments after installation were not available.

Response

- a) Duke Power Company admits the violation.
- b) This violation was caused by failure to follow procedure CP-438, Instrument Protection.
- c) The purpose of CP-438 was to assure that each instrument installed would be reviewed for protection requirements. As written, CP-438 did not require approved signatures or sign offs when filling out the forms. For this reason, the records required by this Construction Procedure cannot be located. As a result of this deficiency, another procedure, CP-368 Instrument Control, has been revised (Rev. 10) to include the CP-438 requirements and to include assurance that these records are properly completed and maintained. Since it is no longer useful, CP-438 has been deleted.
- d) To avoid further violations, action is being taken to assure that there are no other Construction Procedures which are not being completely followed at Catawba. This action involves a renewed emphasis on the annual CP review process to better assure that CP's reflect current practices and needs. In addition, all instruments which presently have no protection will be reviewed to see if protective measures are warranted.
- e) Full compliance will be achieved by November 20, 1985.