



REGIS T. REPKO  
Vice President  
McGuire Nuclear Station

Duke Energy  
MG01VP / 12700 Hagers Ferry Rd.  
Huntersville, NC 28078

980-875-4111  
980-875-4809 fax  
regis.repko@duke-energy.com

September 30, 2011

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Subject: Duke Energy Carolinas, LLC  
McGuire Nuclear Station Units 1 and 2  
Docket Nos. 50-369 and 50-370  
Change in Historical NRC Response

By letter dated January 22, 1982, McGuire responded to an NRC violation issued via Inspection Report 50-369/81-37 and 50-370/81-21. Violation 50-370/81-21-01 applied to housekeeping and cleanliness requirements on various level IV cabinets (relay racks) in the control room.

Attachment 1 provides a change in this historical response documented as Item #4 in the January 22, 1982 letter. This change was processed per NEI 99-04 (Revision 0), "Guidelines for Managing NRC Commitment Changes" resulting in the conclusion that NRC notification was required.

There are no regulatory commitments contained in this submittal.

Questions regarding this submittal should be directed to Kay Crane, McGuire Regulatory Compliance at (980) 875-4306.

  
Regis T. Repko

IEO1  
~~REVI~~  
REG II

U.S. Nuclear Regulatory Commission  
September 30, 2011  
Page 2

cc: V. M. McCree  
Regional Administrator, Region II  
U. S. Nuclear Regulatory Commission  
Marquis One Tower  
245 Peachtree Center Ave., NE, Suite 1200  
Atlanta, GA 30303-1257

Jon H. Thompson (addressee only)  
McGuire Project Manager  
U. S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Mail Stop O-8 G9A  
Rockville, MD, 20852-2738

John Zeiler  
NRC Senior Resident Inspector  
McGuire Nuclear Station

## Attachment 1

### **Violation 50-370/81-21-01 as documented in Inspection Report 50-369/81-37 and 50-370/81-21**

10 CFR 50, Appendix B, Criterion V and the accepted QA Program Section 17.2.5 requires that activities affecting quality shall be prescribed by documented procedures and that these activities shall be accomplished in accordance with these procedures. The accepted QA Program Table 17-0-1 states that the licensee conforms to Regulatory Guide 1.39 (Revision 1) which endorses ANSI N45.2.3-1973. Station Directives 3.11.0, Housekeeping and Cleanliness, Revision 7 dated April 1981, implements the cleanliness and housekeeping program and states, in part, the following for zone designations of Level IV: smoking or use of tobacco products is not permitted.

Contrary to the above, activities affecting quality were not accomplished in accordance with the approved procedure in that the following item was identified during the inspector's tour of various plant areas on December 2, 1981.

1. Various Level IV cabinets (Relay Racks) in the control room had cigarette butts in the bottom of the cabinets.

### **Duke Response Item # 4 in January 22, 1982 Letter:**

4. All electrical cabinets are now checked for cleanliness at a minimum of two-week intervals by Electrical craft personnel. Additionally, the cabinets in the Control Room are checked on a periodic basis by Construction Quality Control.

### **Revised Response:**

The NRC commitment as described above transpired in 1981 during the construction era and is considered historical in nature. Given the condition of electrical cabinets during this time period, inspections at two-week intervals was appropriate. Currently, Nuclear System Directive (NSD) 104, "Material Condition/Housekeeping, Foreign Materiel Exclusion and Seismic Concerns" is the fleet directive that programmatically envelopes all plant equipment including control room electrical cabinets. Smoking is not allowed in the Control Room. Designated smoking areas inside the protected area are controlled.

### **Revised Action:**

Cabinet terminal box and panel inspections are evaluated and maintained through the Periodic Maintenance (PM) program described in Engineering Documents Manual (EDM) 411, "Engineering PM Program Processes."