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 RECIP. NAME: RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Forwards response to NRC 870203 ltr re violations noted in
 Insp Repts 50-269/87-01, 50-270/87-01 & 50-287/87-01.
 Corrective actions: meeting held to review existing cold
 springing procedures & experience w/cold springing pipes.

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April 3, 1987

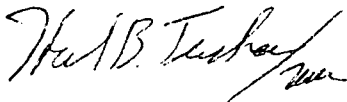
U. S. Nuclear Regulatory Commission
Attention: ~~Document Control Desk~~
Washington, D. C. 20555

Subject: Oconee Nuclear Station
IE Inspection Report
50-269, -270, -287/87-01

Gentlemen:

In response to the subject Notice of Violation dated February 3, 1987, the attached response to the subject item of non-compliance is provided.

Very truly yours,



Hal B. Tucker

PJN/64/sbn

Attachment

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

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

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VIOLATION:

10 CFR 50, Appendix B, Criterion V, as implemented by Topical Report Duke 1-A, Section 17.2.5, requires in part, that instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, on January 8, 1987, the licensee failed to provide procedures with appropriate qualitative or quantitative acceptance criteria for activities important to safety in that the Oconee Pipe Specification used to erect safety related field fabricated piping provided no acceptance criteria for cold springing during installation.

RESPONSE:

(1) Admission or denial of the alleged violation:

The violation is correct in that the Oconee Pipe Specification used to erect safety related field fabricated piping did not contain acceptance criteria for cold springing. QA procedures addressed cold springing for some installations, but Duke feels the program has deficiencies and needs improvement.

(2) Reason for violation:

The violation occurred because there is no clear solution to the question of cold springing for all piping installations. Acceptance criteria for cold springing pipe may be specified as either the maximum distance that a pipe may be moved to make a connection or the maximum force that may be applied to a pipe to make a connection. Each piping installation must be evaluated to determine which criteria is appropriate based on piping size, location of restraints, penetration size, etc. Several attempts have been made in recent months to establish consistent criteria for all piping installations.

(3) The corrective steps which have been taken and the results achieved:

A meeting was held between Design Engineering, Mechanical Maintenance, and Quality Assurance from Duke's three nuclear stations with the following objectives in mind:

- o Review of existing cold springing procedures
- o Review of past experience of cold springing of pipe
- o The improvement of existing procedures

The outcome of the meeting resulted in the following actions:

- (A) Design Engineering agreed to address cold springing in the Oconee Pipe Specification.
- (B) QC has revised their procedures to reject cold springing without an approved procedure.

(C) Oconee Maintenance Craft and Engineers have been instructed to contact Design Engineering for assistance when more than normal had force is needed to align piping.

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

Oconee Pipe Specification will be revised to include a section on cold springing. Mechanical Maintenance Engineers will be trained on the requirement to cold spring a pipe. Additional steps will be considered to include revising the Welding Manual, writing a Maintenance Directive, and training all people in Mechanical Maintenance and QA/QC on cold springing of pipe.

(5) Date of full compliance:

July 1, 1987.