DUKE POWER COMPANY

POWER BUILLING

422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28201

A. C. THIES SENIOR VICE PRESIDENT PRODUCTION AND TRANSMISSION

P. O. Box 2178

February 11, 1972

Mr. John G. Davis, Director U. S. Atomic Energy Commission Division of Compliance Region II - Suite 818 230 Peachtree Street, Northwest Atlanta, Georgia 30303

Subject: CO:II:CEM 50-269/71-7

Dear Mr. Davis:

Please refer to your letter of October 1, 1971, concerning items of apparent non-compliance with Criterion VIII of Appendix B to 10 CFR 50 -"Identification and Control of Materials, Parts, and Components" and also to our reply dated November 19, 1971.

The attached information is submitted in accordance with our verbal agreement with Mr. Norman C. Moseley and is an addenda to the information submitted with our letter of November 19, 1971.

We trust that the attached information is adequate to satisfy your concerns for compliance with the criteria mentioned above, but if further information is desired, please advise.

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Sincerely,

A.C. Thies

PHB:vr Attachment cc: Mr. W. S. Lee Mr. W. H. Owen Mr. E. D. Powell Mr. R. L. Dick

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Oconee 1. Documentation of Piping Materials AEC Division of Compliance (Letter of 10-1-71) Addenda # 1

Supplementing our letter of November 19, 1971, and in answer to questions raised by Mr. Norm Moseley in a telephone conversation on January 31, 1972, we offer the following information for clarification of the initial report.

 "Ge ric Material" as used in the attachment of our 11-19-71 letter reters specifically to either stainless steel or carbon steel piping for Oconee Unit 1.

As stated in the initial report, the problem is not one of 'was quality material utilized' but rather one of 'matching the documentation with the specific piping component." Documentation and materials handling procedures were in use throughout the entire erection phase of Oconee 1 supporting the above definition. Procedural effectiveness is established as only a small percentage of the total Unit 1 materials are not uniquely traceable.

From the beginning of Unit 1 piping procurement and erection, the following procedures have been used:

- a) Only A-106 Gr. B carbon steel and Types 304H and 316H stainless steel materials were purchased for safety-related systems. A minimum of Type 316H stainless steel piping material was required for the project; and for the materials in question, either stainless is adequate for the design conditions based on a review of allowable stress values and other variables. Thus, for this report, Types 316H and 304H stainless steels are considered equally acceptable.
- b) Materials for safety-related systems were received, identified, stored, and issued for erection in accordance with quality control procedures designed to assure that only specified materials were used.
- c) All piping materials purchased for safety-related systems had proper documentation when delivered to the jobsite and were so certified in the shipping papers. Documentation for all material has been received, processed, and approved in accordance with Duke's established criteria.

Based on the above, Duke reaffirms that to replace a material having assured quality with only an equal material having assured quality plus a unique Mill Test Report would not produce a more reliable system.

 As pointed out by Mr. Moseley, the use of "Justification Reasons # 3 and # 4" of Design Deviation Reports requires additional clarification. Justification Bason # 3 as written was used only if Justification Reason # 4 criteria was also met. Therefore, for clarification, Oconee 1. Documentation of Piping Materials AEC Division of Compliance (Letter of 10-1-71) Addenda # 1 Page 2

Reason # 3 is revised to read:

3. "Based on design makeup capacity, a postulated failure of the material component would not render the system inoperable for the safety function intended nor cause a release of radioactivity in excess of established criteria. Therefore, the material is acceptable without replacement."

Reason # 4 is retained as established since it applies only to systems that would be isolated for a materials failure and which are not required to operate in the event of a Loss of Coolant Accident.