DUKE POWER COMPANY
POWER BUILDING
422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28242

WILLIAM O. PARKER, JR.
VICE PRESIDENT
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TELEPHONE: AREA 704
373-4083

May 28, 1980

J. P. O'Reilly, Director
U.S. Nuclear Regulatory Commission
Region II
101 Marietta St., Suite 3100
Atlanta, GA 30303

RE: RII:GFM
50-413/80-05
50-414/80-05

Dear Mr. O'Reilly:

Please find attached a response to Deficiencies 50-413-414/80-05-03, -04 and -05 which were identified in the above referenced IE Inspection Report.

Duke Power Company does not consider any information contained in this inspection report to be proprietary.

Very truly yours,

William O. Parker, Jr. By MM

William O. Parker, Jr.

ROS/mp

Attachment
cc: Mr. G. F. Maxwell (NRC, Catawba Const.)

Catawba Installation Specification CNS-1390.01-00-0095 covering the tagging of safety-related electrical equipment will be issued by June 1, 1980.

Response to Deficiency 50-413-414/80-05-04

Deficiency

As required by Criterion V of Appendix B to 10 CFR 50, as implemented by Duke's Topical Report, paragraph 17.1.5, the corporate quality assurance program procedures specify the quantitative and qualitative criteria to assure satisfactory work performance and quality.

Contrary to the above, the procedure for qualification of site inspection personnel does not have provisions for allowing:

(1) Electrical inspection personnel to be visually examined to assure that they can distinguish between the various colors that inspections require.

(2) Level I inspectors to be designated as technical first line supervisors responsible for supervising and directing all of that particular inspection group's daily efforts.

Response

Procedure QA-140; Quality Control Inspector Training was issued on April 14, 1980, to control the training and certification of quality control inspectors. This procedure, which complements J-1, specifically addresses color perception tests as a prerequisite to certification. Additionally, the revised certification form, QA-140A, contains an entry block for this attribute.

The individual cited in the inspection report has met all requirements for Level II and has been so certified.

DUKE POWER COMPANY

CATAWBA NUCLEAR STATION

Response to Deficiency 50-413-414/80-05-03

Deficiency

As required by Criterion XVI of Appendix B to 10 CFR 50, as implemented by Duke's Topical Report, paragraph 17.1.16.2, nonconforming conditions shall be analyzed and appropriate corrective action taken to preclude repetition.

Contrary to the above, appropriate corrective action was not taken for site nonconformance reports numbered 5756 (closed September 5, 1979) and 6104 (closed November 29, 1979); as site drawings are still not being properly identified as nuclear safety related documents.

Response

In the course of the inspection, the inspector identified two drawings containing Class 1E cables which were not properly identified as "NUCLEAR SAFETY RELATED." Subsequent to the inspection a Nonconforming Item Report, Serial No. 8014, was issued and the subject drawings were re-issued on March 27, 1980, properly stamped "NUCLEAR SAFETY RFLATED."

The inspector also reviewed two additional Nonconforming Item Reports indicating similar problems with two other drawings. As follow up action to prevent the recurrence of this problem in the future, QA Procedure PR-130, Engineering Drawings, and PR-220, Nonconforming Item Reports, will be reviewed with all Design Engineering personnel in the regularly scheduled QA Review training program.

Additionally, Design Engineering has asked the Quality Assurance Department to conduct a review for the proper identification of engineering drawings. The results of this review will be used to determine if further corrective action is necessary.

Response to Deficiency 50-413-414/80-05-05

Deficiency

As required by Criterion III of Appendix B to 10 CFR 50, as implemented by Duke's Topical Report, paragraph 17.1.3, design engineering places emphasis on assuring conformance with standards and SAR design commitments.

Contrary to the above, design has failed to translate into drawings or specifications SAR requirements that all Class 1E equipment be distinctively identifiable to their respective safety trains.

Response

In accordance with the Catawba FSAR, Class 1E equipment is identified according to its particular safety train or channel by means of color coded tags. These tags are installed during construction in accordance with an installation specification.