

Handwritten signature

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

A. C. THIES
VICE PRESIDENT
PRODUCTION AND OPERATION

P. O. Box 2178
28201

June 14, 1971

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

Dear Mr. Davis:

With reference to your letter of May 15, 1971 pointing out items of apparent non-conformance with Appendix B to 10 CFR 50, "Quality Assurance Program for Nuclear Power Plants," we would comment as follows:

We have carefully checked into the items of concern that your inspectors, Messrs. C. E. Murphy, R. F. Warnick, and H. L. Whitener had at the time of their May 4 through 7, 1971 visit with reference to the test procedures test results, and documentation thereof. Our personnel who were conducting the tests considered the changes that were made in the test procedures at the time of their being conducted to be of such nature that they did not require precise adherence to the "Guide for Conducting the Oconee Initial Test Program" or through possible oversight failed to document some detail. At any rate, we have made a concerted effort to review our use of the "Guide for Conducting the Oconee Initial Test Program" to tighten up overall control of the initial test program. We had considered this guide as a guide and not as a specific procedure that had to be followed in every minute detail; however, we will see that it is followed more closely in the future. Contacts have been made with the supervisory personnel at the station and these matters have been given additional emphasis with every man.

The documentation associated with Procedure TP-200-16, Reactor Coolant System Cleaning, has been thoroughly reviewed by members of the Oconee Operating Staff and the General Office Review Committee and these agree that the acceptance criteria has been satisfactorily met.

Item 2 of your letter dealt with criteria XVIII covering periodic audits that shall be carried out to verify compliance. We agree that our audits

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have not been completed, and we further agree that it would be beneficial to improve the speed with which this audit is provided. To implement this and to assure that the objectives of the test program are met and that proper documentation is provided, the program of audit has been initiated at the station level, at the Steam Production General Office level, and by the General Office Review Committee. Two men at the station not having direct responsibility for the testing program have been assigned specific responsibilities for auditing test results and documentation. In addition to this the Superintendent, the Assistant Superintendent, and the Group Heads are performing periodic audits as a part of their routine duties. A staff member of the Steam Production Department General Office is assigned the responsibility for visiting the station at approximately weekly intervals to perform further specific audits, and the General Office Review Committee is performing an audit when it meets on the site.

We certainly recognize the value of following the proper procedures, and we believe that the compliance visit and your questions have served the purpose of further emphasizing the importance of keeping our testing program on a thorough and orderly basis even from the beginning.

We believe that the actions that we have taken will answer the questions raised in your letter and will result in a stronger test program at Oconee.

Very truly yours,

A. C. Thies
A. C. Thies *ACT*

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