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UNITED STATES ATOMIC ENERGY COMMISSION DIVISION OF COMPLIANCE REGION II - SUITE 818 230 PEACHTREE STREET, NORTHWEST ATLANTA, GEORGIA 30303

TELEPHONE: 4041 526-4503

January 21, 1972

In Reply Refer To: CO:II:CEM 50-269/71-8

> Duke Power Company Attn: Mr. A. C. Thies, Senior Vice President Production and Transmission Power Building 422 South Church Street Charlotte, North Carolina 28201

Gentlemen:

This refers to the inspection conducted by Mr. Murphy of this office and other Division of Compliance staff members on September 7-10, 1971, of activities authorized by AEC Construction Permit No. CPPR-33 and to the discussions of our findings held by Mr. Murphy with Mr. Smith and other members of your staff at the conclusion of the inspection.

Areas examined during this inspection included a review of the documentation of the results of preoperational tests, adequacy of plant security, management audits of construction activities, qualification and training of quality control personnel, installation of safety feature instrumentation, and equipment quality control records. Within these areas, the inspection consisted of interviews with plant personnel, selective examinations of procedures and representative records, and observations by the inspectors.

During this inspection, it was found that certain of your activities appeared to be in noncompliance with AEC requirements. These items and reference to pertinent requirements are listed in the enclosure to this letter. Please provide us within 30 days, in writing, with your comments concerning these items, any steps which have been or will be taken to correct them, any steps that have been or will be taken to prevent recurrence, and the date all corrective action or preventive measures were or will be completed.

It is our understanding that your plant security requirements will be strengthened to preclude the entry of unauthorized personnel to the plant area.

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Duke Power Company

During this inspection, the inspector requested to review the data relating to the calibration tests that had been conducted on the reactor coolant system flow sensing element and your evaluation of these tests. It is our understanding that you have not completed your review of these tests, but that data and your evaluation will be made available to the inspector during a subsequent inspection.

Concerning the qualifications and training of the site quality assurance personnel, it is our understanding that steps will be taken to assure that the personnel become familiar with applicable codes and regulations and that steps will also be taken to strengthen the quality assurance program.

Should you have any questions concerning this letter, you may communicate directly with this office.

Yery truly yours, Davis

Enclosure: Description of Items of Noncompliance ENCLOSURE DOCKET NO. 50-269

Certain activities under your license appear to be in noncompliance with license requirements as listed below:

 Criterion XVIII of Appendix B to 10 CFR 50, "Audits," requires, in part, that a comprehensive system of planned and periodic audits be carried out to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program. These audits shall be performed in accordance with written procedures by appropriately trained personnel.

Contrary to the above, in discussions with Messrs. Rogers and Bean, our inspector was advised that such audits had not been made of the construction aspects of the quality assurance program.

2. Criterion XI of Appendix B to 10 CFR 50, "Test Control," requires, in part, that test results be documented and evaluated to assure that test requirements have been satisfied.

The deficiency documentation required by Duke Power Company's testing program was not prepared to show that the specified inspection of the valve seats was not accomplished during the performance of the "Reactor Internals Vent Valve Inspection Test" (TP 1 A 200 1 1). Also, the omission of the inspection was not evaluated.

3. Criterion V of Appendix B to 10 CFR 50, "Document Control," requires, in part, that measures shall be established to control the issuance of documents, such as instructions and procedures, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed.

Contrary to the above, our inspector's examination of preoperational test records shows that tests were performed prior to approval of the test procedures; that test data were not recorded as prescribed by procedures; that changes to approved procedures were not performed in accordance with Duke Power Company's approved "Guide for Conducting the Oconee Initial Test Program"; and, that discrepancies were not identified. Specific examples of the above deficiencies are as follows:

a. Log entries and data sheets indicate a significant portion of the "Reference Vessel System Leak Test" (TP 1 B 150 9 3) and part of "Reactor Building Pressure Wide Range Instrument Calibration" (TP 1 B 150 1 E) were performed prior to approval of the respective test procedure.

- b. "Reactor Building Isolation Pneumatic Leak Test" (TP 1 A 150 6 2), Sections 10, 12.4, and calculation sheet specify that the temperature at the barometer be recorded and the corrected barometer reading be used on the calculation sheet. The data sheets examined by our inspector did not contain readings of the temperature at the barometer and the inspector was advised by the test coordinator that the uncorrected barometer reading was used in making leak rate calculations.
- c. "Reference Vessel System Leak Test" (TP 1 B 150 9 3), Section 10.3, requires that temperature and pressure data be recorded hourly. There was no documentation to indicate that this data had been recorded.
- d. Procedure changes indicated on the cover sheet of "Personnel and Emergency Lock Leak Rate Test" (TP 1 B 150 8 1) were not initialed to show approval and authorization of the changes. Two of the indicated changes were not made in the body of the procedure. In addition, the last four changes listed on the cover sheet of "Electrical Penetration O-Ring Seal Leak Test" (TP 1 A 150 5 1) were made after July 30, 1971, and predated to July 24, 1971, on the cover sheet.
- e. Some of the prerequisites for the "Reactor Internals Vent Valve Inspection Test" (TP 1 A 200 1 1) were revised during testing. Some test steps were conducted prior to the revisions. These test steps were not redone; therefore, the test as conducted was not in accordance with the approved procedure.

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