



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
101 MARIETTA ST., N.W., SUITE 3100  
ATLANTA, GEORGIA 30303

TIC

OCT 16 1980

In Reply Refer To:

RII:VLB

50-369/80-08

50-370/80-05

50-413/80-09

50-414/80-09

50-491/80-07

50-492/80-06

50-493/80-06

Duke Power Company

ATTN: W. O. Parker, Jr.

Vice President, Steam Production

P. O. Box 2178

Charlotte, NC 28242

Gentlemen:

Thank you for your letter of August 15, 1980 informing us of steps you have taken to correct the items of noncompliance concerning activities under NRC Construction Permit Nos. CPPR-83, CPPR-84, CPPR-116, CPPR-117, CPPR-167, CPPR-168, and CPPR-169, brought to your attention in our letter of July 18, 1980.

We have examined your corrective actions and plans as detailed in your letter of response and which were discussed in a telephone conversation between W. H. Bradley of your staff and T. E. Conlon on September 18, 1980. As a result of this conversation it was agreed that:

- a. We concur with your response to Infraction 369/80-08-02; 370/80-05-02; 413, 414/80-09-02; 491/80-07-02; 492, 493/80-06-02, "Procedures Implementing ANSI N45.2.9 for the Corporate Records Vault".

The infraction as stated was incorrect and should have been stated as you note: "The existing acknowledged procedures fail to require or take credit for meeting all the requirements of ANSI N45.2.9."

No additional response is required regarding this matter.

- b. We do not concur with your response statement relative to Infraction 369/80-08-01; 370/80-05-01; 413, 414/80-09-01; 491/80-07-01; 492, 493/80-06-01, "Temporary Record Storage Facilities in the Engineering and Services Division and Design Engineering Department Fail to Meet the Fire Protection Requirements of ANSI N45.2.9-1979".

Your response is inadequate in that it does not fully describe the actual circumstances at the time of the inspection; therefore, certain corrective actions as stated are not acceptable. During the inspection, DPC emphatically stated they were not taking credit for duplicate records because they were not sure that they could demonstrate adequacy. Your response statement infers that you are now taking credit for the alternative system.

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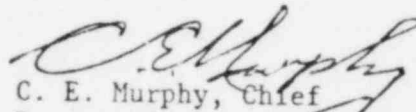
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Additionally, we can not accept your position that design calculations will be maintained in work areas until related calculations are completed. The Commission's position is that when design output documents (reference ANSI N45.2.11-1974) are completed they must be collected, stored, and maintained in accordance with requirements of ANSI N45.2.9 (reference Section 10, ANSI N45.2.11-1974). If you elect to implement the accepted alternative provisions of ANSI N45.2.9, you must address separation criteria for the duplicate records.

- c. The Notice of Violation transmitted to you on July 18, 1980, remains unchanged regarding the above matters. Section 2.201 requires you to submit to this office a written statement or explanation in reply including: (1) corrective steps which have been taken by you and the results achieved; (2) corrective steps which will be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. We understand that you will supplement your response of July 18, 1980. Your written statement of explanation should be submitted to this office within 20 days of your receipt of this letter.

We appreciate your cooperation with us.

Sincerely,



C. E. Murphy, Chief  
Reactor Construction and Engineering  
Support Branch

cc: J. W. Hampton, Station Manager  
D. G. Beam, Project Manager  
L. C. Dail, Vice President  
Design Engineering  
J. T. Moore, Project Manager  
M. D. McIntosh, Plant Manager  
J. C. Rogers, Project Manager