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

80 DEC 16 A 8:5

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

December 12, 1980

TELEPHONE AREA 704
373-4083

Mr. James P. O'Reilly, Director
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Re: RII:WPK
50-413/80-29
50-414/80-29

Dear Mr. O'Reilly:

Please find attached a response to Infraction No. 413-414/80-29-01 and Deficiency No. 413-414/80-29-03 which were identified in the above referenced 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 [illegible]

RWO:scs

cc: NRC Resident Inspector
Catawba Nuclear Station

DUKE POWER COMPANY
CATAWBA NUCLEAR STATION

Response to Infraction No. 413-414/80-29-01 and
Deficiency No. 413-414/80-29-03

Infraction

As required by 10CFR 50, Appendix B, Criterion XIII and implemented by Duke Power Company (DPC) Topical Report "DUKE 1-A", Section 17, Paragraph 17.1.13 "Measures shall be established to control the handling, storage . . . and preservation of material and equipment . . . to prevent damage . . ." Duke Quality Assurance Program Procedure P-3, Revision 12 "Storage Inspection," Paragraph 4.1.1 requires storage to be in accordance with ANSI N45.2.2. ANSI N45.2.-1972, "Packaging, Shipping and Handling of Items for Nuclear Power Plants (During the Construction Phase)", Paragraph 6.3.3 states "Hazardous chemicals, paints, solvents and other materials of a like nature shall be stored in well ventilation areas which are not in close proximity to important nuclear items."

Contrary to the above, on October 15, 1980 the following examples were noted:

1. An outboard motor boat with attached tank containing gasoline was stored in close proximity to safety-related motor-operated valves.

2. Six aerosol cans of flammable liquid penetrant cleaner were stored adjacent to nuclear steam supply system components.

Response

An outboard motor boat with attached tank was stored in a warehouse which contained safety-related motor-operated valves. A small quantity of gasoline (less than one quart) was inadvertently left in the tank. To correct the situation, the boat and motor have been removed from the warehouse.

The six aerosol cans of flammable liquid penetrant cleaner were nonconforming items stored in an area designated for nonconforming items which was adjacent to nuclear steam supply system components. The cans of liquid penetrant cleaner were removed and stored in a paint storage facility. A fireproof cabinet is being purchased to use for storage of nonconforming liquid penetrant cleaner; however, in the interim, such material will be stored in a paint storage facility.

Warehouse personnel have been advised not to store hazardous chemicals, paints, solvents and other materials of a like nature in close proximity to important nuclear items. These actions were completed prior to November 1, 1980.

Deficiency

As required by 10CFR 50, Appendix B, Criterion XVII and as implemented by Duke Power Company (DPC) Topical Report "DUKE 1-A" Section 17 paragraph 17.1.17 "---Records shall be maintained to furnish evidence of activities affecting quality---." Paragraph QW-201.2 of ASME Section IX requires that the specific facts involved in qualifying a weld procedure specification (WPS) be recorded in a procedure qualification record (PQR).

Contrary to the above, on October 16, 1980 a specific code required fact (essential variable - Preheat Temperature - QW-406.1) was listed as a range on PQR No. L110A, that was not representative of the actual testing conditions.

Response

Although specific facts were not recorded in PQR L-110A, the essential variable of Section IX, QW-406.1, has not been violated. Our Field Weld Data Sheet written under this PQR, L-554, specifies a preheat of "60-120°F if below 32°F" for materials less than 3/4" thick. A decrease of 100°F from the upper limit of 120°F specified on the PQR would be covered by the note on the FWDS. No welding is allowed on material with a temperature below 32°F.

All Duke Power construction sites have agreed to record actual preheat temperatures on future PQR's.