DUKE POWER COMPANY

POWER PUTIDING A. GEORGIA

422 SOUTH CHURCH STRIET, CHARLOTTE, N. C. 28242

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June 1, 1981

WILLIAM O. PARKER, JR. VICE PRESIDENT STEAM PRODUCTION

TELEPHONE: AREA 704 373-1083

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

Re: RII: EHG 50-413/80-17 50-414/80-17

Dear Mr. O'Reilly:

Plesse find attached final response to Infraction No. 413-4-4/80-17-01 which was identified in the above referenced Inspection Report.

I declare under penalty of perjury that the statements set forth herein are true and correct to the best of my knowledge.

Very truly yours,

William o. Parker, Jr. by PHB William O. Parker, Jr.

RWO/djs Attachment

cc: NRC - Catawba Resident Inspector

- During inspection conducted July 21 25, 1980, five welds on socket welded flanges were identified as being undersized. These welds were identified to DPC personnel, and it was confirmed that they were undersized due to slight concavity and local irregularities.
- 2. The socket welded flanges had been previously accepted by QC welding inspectors. It is significant to note that Duke Power Company chooses to fabricate all socket welded flanges per L-200 which meets the ASME Code and is more stringent than ANSI B31.1. ANSI requires a fillet weld leg length of 1.09t as opposed to the 1.4t required by ASME. The size weld is a function of pipe wall thickness and often results in odd sizes (i.e., 0.186", 0.305"). It is makes measurement difficult considering the geometry involved and resulted in estimations of weld leg size being made by the inspectors.
- 3. A) All welding inspectors have been retrained in accordance with Welding Program Process Specification L-200 "Gas Tungsten Arc Welding" and Quality Assurance Porcedure L-80 "Visual Workmanship Standards for Welds".

Construction Procedure #427 "Hold Faints and Process Control Requirements for ASME Class A, B, and C Welds" was issued on July 25, 1980, which provides additional information to the welding inspector to aid in determining weld leg length for socket welded flanges.

B) A program was developed whereby all socket welded flanges for ASME (Duke Class A, B, and C) and ANSI B31.1 (Duke Class E and F) welded prior to August 27, 1980, were identified. Upon review of the program printout, which listed socket welded flanges by weld number, Duke Class, size and schedule, the decision was made to reinspect all welds listed with repairs to be made as necessary.

Results of reinspection found that 301 (approx. 17% of the total welds reinspected) welds were undersized. Repair process control forms were issued for all welds found to be undersized.

- To prevent further violations, welding inspectors have been retrained in the requirements of L-200 and L-80. Construction Procedure #427 was developed and implemented.
- Reinspection is complete and all repairs have been made. Full compliance was achieved by June 1, 1981.