

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

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WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

September 30, 1981

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

Subject: McGuire Nuclear Station
Docket Nos. 50-369 and 50-370

Reference: RII:GAB
50-369/81-17
50-370/81-05

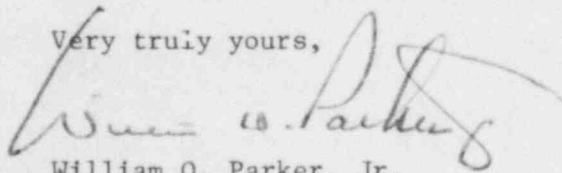
Dear Mr. O'Reilly:

In my August 20, 1981 letter transmitting Duke Power Company's response to violations identified in the subject inspection reports, it was indicated that information concerning the corrective steps which will be taken to avoid further violations (response element #4) for violation 50-369/81-17-02 would be supplied by September 30, 1981. Subsequent review has determined that no further corrective actions are required at this time. We will continue to monitor this area to determine if any actions are required in the future.

In addition, attached is a revised response to violation 50-369/81-17-03 requested by Mr. Paul Frederickson of your office, clarifying several concerns he expressed in telephone conversations with various Duke Power employees between September 15 and 23, 1981.

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.

PBN/smh

Attachment

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McGUIRE NUCLEAR STATION
REVISED RESPONSE TO IE INSPECTION REPORT 50-369/81-17 and 50-370/81-05

Violation 50-369/81-17-03, Severity Level V:

10 CFR 50, Appendix B Criterion V and the accepted QA Program, Section 17.2.5, required that activities affecting quality shall be prescribed by documented procedures and that these activities shall be accomplished in accordance with these procedures. The accepted QA Program Table 17.0.1 states that the licensee conforms to Regulatory Guide 1.39 (Revision 1) which endorses ANSI N45.2.3-1973. Station Directives 3.11.0, Housekeeping and Cleanliness, Revision 7 dated April 1981, implements the cleanliness and housekeeping program and states, in part, the following zone designations of Level III and IV: smoking or use of tobacco products is not permitted; level cleanliness signs shall be posted; garbage, trash, scraps, litter and other excess materials shall be collected, removed from the job site or disposed of in designated areas following acceptance practices; and that for a Level III zone a log shall be maintained at the entrance of the area to log personnel and materials in and out of the area.

Contrary to the above, activities affecting quality were not accomplished in accordance with the approved procedure in that the following items were identified during the inspector's tour of various plant areas on June 10-11, 1981.

1. Various Level IV cabinets (Cabinets #2, #5, #7, Common HVAC Panels) in the control room had cigarette butts, screws, wire scraps, tie wraps, plastic, and miscellaneous other pieces of material in the bottom of the cabinets.
2. In Cable Room 801 (Level IV) trash, wire brushes, cigarette butts, paper and extra cable were observed in several of the cable trays.
3. In the fuel pool area (Level IV) trash and cigarette butts were observed on the floor and loose material was being stored in the area. In addition, the pool was posted as a Level III area and a review of the log indicated that all material and personnel were not being logged in and out of the area.
4. Fire hoses designated 1RF168, 1RF167, 1RF 6, and 1RF163 were not properly stored in their containers in various plant area.
5. Work was being performed on Safety Injection Pump 1A and the pump and surrounding area had been designated as a Level III area. The area was not cleaned to level requirements prior to initiating work and the log did not contain an accounting of all material in the area designated; however, materials being used by the crafts performing the pump work was controlled properly.
6. Welding cables, temporary lines, and cables that had not been terminated were being supported by valves, valve handwheels and instrumentation in various plant areas.
7. Level III and IV areas are being posted, but certain areas did not meet the posting requirements specified in the Station Directive.

Response:

1. Duke Power Company admits to the violation.

2. This violation was caused by station personnel being unfamiliar with the constraints associated with working in housekeeping zones. Continued construction work in these areas also contributed to this violation.
3. Supervisors have been counseled on the need for compliance with housekeeping requirements and instructed to pass this concern to the individuals under their supervision. Although there is no training session for new employees specifically devoted to housekeeping, cleanliness levels are discussed in the health physics portion of the training, all work requests contain housekeeping provisions, and there is a station directive on housekeeping. Additionally, several tours of the facility were made by station management to heighten station personnel's awareness of cleanliness requirements and the need for enforcement. Station management, while always concerned with any housekeeping problems when routinely touring the plant made these special tours in an effort to impress upon the employees their concern with housekeeping and the importance management places in it. These special tours are not envisioned as a continuing practice, but would be repeated if housekeeping problems persist.

The specific examples cited above have been corrected.

4. A mechanism has been established which will require a cleanliness inspection by station Quality Assurance prior to accepting turnover from construction. This should eliminate many of the cleanliness problems encountered on Unit 1. In addition, Quality Assurance has a program for a systematic quality control inspection/audit to determine if measures being taken to control housekeeping problems are adequate. These measures include a systematic cleanup program with a contract cleaning service (K-MAC) which will continue beyond the construction phase of the plant, and inclusion of inspection/cleaning in preventative maintenance programs.

Duke Power Company believes these measures are adequate, and does not feel housekeeping will continue to be a major problem, especially with the construction effort winding down.

5. The station is presently in full compliance.