

USNRC REGION II
ATLANTA, GEORGIA
DUKE POWER COMPANY
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CHARLOTTE, N.C. 28242

HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

TELEPHONE
(704) 373-4531

82 SEP 13 A10: 54
September 7, 1982

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

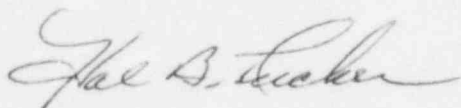
Re: RII:PKV
50-413/82-18
50-414/82-16

Dear Mr. O'Reilly:

Please find attached a response to Violation Nos. 413/82-18-01, 414/82-16-01 and 413/82-18-02, 414/82-16-02 as identified in the above referenced Inspection Report. Duke Power Company does not consider any information contained in this Inspection Report to be proprietary.

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,



Hal B. Tucker

RWO/php
Attachment

cc: Mr. P. K. Van Doorn
NRC Resident Inspector
Catawba Nuclear Station

Mr. Robert Guild, Esq.
Attorney-at-Law
314 Pall Mall
Columbia, South Carolina 29201

Palmetto Alliance
2135½ Devine Street
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DUKE POWER COMPANY
CATAWBA NUCLEAR STATION

Violation

10 CFR 50, Appendix B, Criterion V, as implemented by the QA Topical Report (DUKE-1) Section 17.1.5.2 requires that activities affecting quality be accomplished in accordance with prescribed instructions, procedures, or drawings. Construction Department Procedure H-7, Section 4.2, states that storage of Service Level I coating materials shall be in an enclosed warehouse with controlled temperature in order that the material temperature will not exceed the limits specified on the Product Data Sheets. Additionally, Construction Department Procedure Q-1 states that any person finding a nonconforming item (an item which does not conform with QA procedures) shall initiate form Q-1A, Nonconforming Item Report (NCI).

Contrary to the above, the Paint Storage Warehouse high-low daily temperature log entries were below the 35° minimum temperature for certain Service Level I coating materials on both 12/21/81 and 1/11/82. Nonconforming Item Reports were not initiated to evaluate the nonconformance in either instance.

Response

1. Duke Power admits the violation. The Paint Storage Warehouse high-low daily temperature readings were found to be below the 40° minimum temperature required by the ANSI "B" Storage Level. No nonconforming item had been initiated.
2. Required warehouse temperature ranges for storage inspections required by QA Procedure P-3 were 40°F to 125°F as stated in R. A. Morgan's attached memo. QA Procedure H-7 which covers control of coating material states the storage temperature should not exceed the limits specified on the Product Data Sheets which were less stringent than the 40°F minimum specified by R. A. Morgan's memo and the ANSI Storage Level "B" requirements.

The Materials person followed the less restrictive QAP H-7 requirements and was unaware that the readings violated QAP P-3 and that a nonconforming item should have been generated.

3. Nonconforming Item #15432 has been initiated. It identified the temperature and dates from the warehouse log that were below 40°F. The disposition will direct any remedial action on previously applied coatings.
4. The Materials personnel will be retrained on the storage requirements and QAP Q-1.

The Paint Storage Warehouse shall be upgraded to maintain a 40°F minimum temperature during the winter months.

5. Training in Item 4 will be completed by September 15, 1982. The Paint Storage Warehouse will be upgraded by October 15, 1982. The Nonconforming Item #15432 will be cleared by December 31, 1982.

Violation

10 CFR 50, Appendix B, Criterion V, as implemented by the QA Topical Report (DUKE-i) Section 17.1.5.2 requires that activities affecting quality be accomplished in accordance with prescribed instructions, procedures, or drawings. Procedure QA 300, Section 4.1, states that surveillance shall be conducted on each major work activity at least once each calendar quarter.

Contrary to the above, examination of Surveillance Checklists (Form QA-300A) for the years 1981 - 1982 in the civil work activity revealed that the required quarterly surveillance frequency was not met for the fourth quarter of 1981 and for the second quarter of 1982.

Response

1. Duke Power admits that Surveillance Checklist CEI-1 was not completed in the fourth quarter of 1981 and the second quarter of 1982.
2. This violation of QA300 occurred due to a scheduling error made in September 1981. An indication on the scheduling calendar meant to indicate a quarterly surveillance was misread to mean every other quarter.
3. A surveillance was performed using checklist CEI-1 in the Civil area in the first quarter of 1982. No deficiencies were identified during this surveillance. A new scheduling calendar has been produced which clearly shows the requirement for quarterly surveillance activity. A surveillance is planned for this area for the third quarter of 1982.
4. An organization change effective September 1, 1982 created the position of Surveillance Supervisor reporting to the Project Quality Assurance Manager. The increased control resulting from this change should preclude repetition of this type error.
5. Corrective action resulting in full compliance is complete.

ATTACHMENT 1

October 21, 1977

Memo to L R Davison

Re: A Level Storage
and Coatings Storage;
Weekly P-3C Inspections

During weekly P-3C inspections of storage areas, the following parameters shall be measured and recorded on the P-3C:

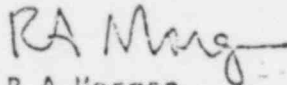
A Level Storage: Temperature and Humidity

Coatings Warehouses: Temperature

Any of these areas which fall outside of the following limits shall be immediately nonconformed with the entrance to the building (or part of building) tagged so that materials cannot be removed.

A Level Storage: Temperature: 50°F to 90°F
Humidity: 0% to 60%

Coatings warehouses: Temperature: 40°F to 125°F



R A Morgan
Senior Quality Assurance Engineer

cc: D G Beam
M. Manley
J W Willis
R P Ruth