

DUKE POWER COMPANY  
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HAL B. TUCKER  
VICE PRESIDENT  
NUCLEAR PRODUCTION

TELEPHONE  
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January 14, 1983

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

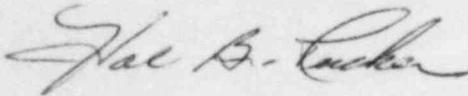
Re: RII:PKV  
50-413/82-21  
50-414/82-19

Dear Mr. O'Reilly:

Please find attached a response to Violation No. 413/82-21-03, 414/82-19-01. 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

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DUKE POWER COMPANY  
CATAWBA NUCLEAR STATION

VIOLATION:

10 CFR 50, Appendix B, Criterion V, as implemented by Topcial Report Duke 1-A, Section 17, paragraph 17.1.5 requires that activities affecting quality be accomplished in accordance with established procedures. Duke Power Company QA procedure Q1, Rev. 15 and 16, requires that nonconforming item evaluations be clear and complete and that nonconforming items be evaluated by appropriate personnel to determine if the condition is repetitive to the extent corrective action should be implemented.

Contrary to the above, activities affecting quality were not performed in accordance with established procedures in that nonconforming item report (NCI) evaluations did not conform to procedure requirements as follows:

1. NCI 13,632 - Evaluation dated February 26, 1982 was inadequate in that the NCI identifying a problem of steel embedments with missing studs failed to consider a similar problem experienced in other applications, thereby omitting the possibility of recurrent problems. The evaluation stated that "this condition is rare" and "It is not felt that this condition is repetitive enough to warrant corrective action."
2. NCI 12,337 - Evaluation dated April 30, 1982 was incomplete in that it did not clearly document evaluation of all possiblities of stress corrosion cracking in piping system flow sections and the evaluation did not document consideration of welding residual stresses.
3. NCI 14,086 - Evaluation dated April 27, 1982, which addressed defects caused by construction personnel, was inappropriately performed by Design Engineering personnel and the evaluation erroneously stated that the defects described by the NCI were not repetitive.
4. NCI 14,261 - Evaluation date April 26, 1982, which addressed a nonconforming condition caused by construction personnel, was inappropriately performed by Design Engineering personnel and the evaluation erroneously stated that the condition was not repetitive to the extent requiring corrective action.

Response:

1. Duke admits this violation as stated.
2. The reason for the violation is that there has been some misunderstanding, as to the degree of documentation and evaluation required, in deterring the "root cause" or "corrective action" of NCI's.
3. An NCI Evaluation Team has been formed to review all NCI's and identify areas of concern to Duke Department management. The Evaluation Team assures a thorough and accurate disposition of NCI reports by verifying that procedure requirements for evaluating an NCI are understood, root causes are identified and appropriate corrective action is taken, on each NCI report. NCI reports, judged deficient by the Evaluation Team, are returned to the responsible individuals and reworked until the Evaluation Team is satisfied.

4. The NCI Evaluation Team will continue to review NCI's and train individuals involved in resolving NCI's.
5. Full compliance has been achieved as of this date, January 14, 1983.