

ENCLOSURE

NOTICE OF VIOLATION

Duke Power Company
Catawba 1 & 2

Docket Nos. 50-413 and 50-414
License Nos. CPPR-116 and CPPR-117

The following violation was identified during an inspection conducted on December 1 - 25, 1983. The Severity Level was assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

10 CFR 50, Appendix B, Criterion IX, as implemented by the licensee's accepted QA Topic Report, Duke-1-A (Amendment 6), paragraph 17.2.9, requires that measures be established to assure that special processes, including welding, heat treating, and nondestructive testing, are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other requirements.

Table 17.0-1 of the Duke Power Company QA Topical Report, Duke-1-A (Amendment 6), commits to Regulatory Guide 1.58, Revision 1 which endorses ANSI 45.2.6-1978 for both construction and operation of the plant. Furthermore, it states that Duke nondestructive examination personnel will meet the qualification requirements described in SNT-TC-1A-1975 and SNT-TC-1A-1980 documentation. Procedures QA-140, "Quality Assurance Inspector Training", Revision 7 and NDE-B, "Training Qualification and Certification of NDE Personnel", Revision 6 are used for indoctrination and training of NDE personnel, and are designed to implement applicable qualification requirements.

Contrary to the above, procedures QA-140, Revision 7 and NDE-B, Revision 6 were found not to be in compliance with Regulatory Guide 1.58, Revision 1, the applicable standard, and SNT documentation for qualification of personnel as indicated in the following examples:

1. Procedure QA-140 per Section 5.3.1 permits assigning a person as a Level II inspector having only 12 months experience compared to the three year related experience requirement as stated in ANSI N45-2.6-1978, paragraph 3.5.2(2).
2. Procedure QA-140, paragraph 5.3.3 allows equivalent experience for a Level III inspector in manufacturing, construction, installation or operational activities. ANSI N45.2.6-1978, paragraph 3.5.3 addresses experience in equivalent inspection, to be in examination or testing activities. Hence, the former specification is more broad in scope and is not identified in the accepted QA program as an alternative to the ANSI standard requirement.

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3. Procedure NDE-B does not address practical demonstration of proficiency for a Level III inspector or provide basis for waiver of this examination; SNT-TC-1A-1975, paragraph 8.5.3 requires proficiency of a Level III inspector to be demonstrated.

This is a Severity Level IV Violation (Supplement II).

Pursuant to 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved.

Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

Date FEB 24 1984