DUKE POWER COMPANIANTA FORGIA P.O. BOX 33189 CHARLOTTE, N.C. 28242

HAL B. TUCKER VICE PRESIDENT NUCLEAR PRODUCTION

July 22, 1983 83 AUG | All: 13

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Mr. James P. O'Reilly, Regional Administrator U. S. Nuclear Regulatory Commission Region II 101 Marietta Street, NW, Suite 2900 Atlanta, Georgia 30303

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

Re: RII: GM 50-369/83-16, 50-370/83-23

Dear Mr. O'Reilly:

As requested by Mr. T. E. Conlon of your staff in a conference call held on July 11, 1983, please find attached a supplemental response to Violation 369/ 83-16-02, Part B.

Very truly yours,

H.B. Tuchen 1 to

Hal B. Tucker

WHM/php

Attachment

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PDR

cc: Mr. W. T. Orders NRC Resident Inspector McGuire Nuclear Station

Supplemental Response to Violation 50-369/83-16-02, Part B

 Duke Power Company does not agree that a violation occurred as a result of the use of "sample basis" on Form M-41B, Serial Number 2. Forms M-41B are generated as required by Quality Assurance Procedure M-41. Quality Assurance Technical Support personnel use form M-41B to direct required inspections in the electrical area. The term "sample basis" on M-41B, Serial Number 2 was not written to indicate a statistical sampling plan in accordance with N45.2. The inspections on Form M-41-B, Serial Number 2, provide a monitoring of erection and fabrication processes. To avoid any future confusion, M-41B Serial Number 2 will be changed to delete the term "sample".

The QC inspectors are trained, tested and certified in accordance with a documented program which assures their knowledge of the appropriate inspection methods and procedures. They are specifically trained in QA Procedure M-41 and Forms M-41B. The site QA group reviews all QA Condition 1 work activities and they (along with QC Supervisors) state on the process control record what inspections are required for that activity. This review assures that necessary QC inspections are specified. During the erection and fabrication process of electrical equipment, the QC inspectors monitor the work activities as specified on the process control record to assure erection and fabrication standards are being followed by the craft personnel. At the completion of all QA Condition 1 work, there is a final QC inspector is required to sign for the completion of inspections. This signature documents inspection completion in accordance with referenced drawings, specifications, and inspection documents. The inspection records then receive a final QA review and signature.

Deficiencies discovered by QC inspectors are documented according to QA Procedure R-2, "Identification and Resolution of Discrepancies". When nonconformances are identified, QA Procedure Q-1, "Control of Nonconforming Items", is followed. All QA and QC personnel are trained in the use of Procedures R-2 and Q-1. In addition to the QC inspection effort, there is a QA surveillance program that monitors, on a selected basis, work activities in the field. This surveillance program provides a second level QA examination to ongoing work.

- 2. N/A
- 3. No corrective steps were deemed necessary.
- No further actions are considered necessary; however, as indicated above, Form M-41B, Serial Number 2 will be changed to clarify language. This change will be completed by August 30, 1983.
- 5. McGuire Nuclear Station will be in full compliance upon completion of item 4 above.