

**DUKE POWER COMPANY**

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June 7, 1983

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

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

Dear Mr. O'Reilly:

Please find attached a response to violation 50-369/83-16-02 which was identified in IE Inspection Report 50-369/83-16, 50-370/83-23. Duke Power Company does not consider any information contained in this report to be proprietary.

Very truly yours,

*Hal B. Tucker*

Hal B. Tucker

*by RAB*

WHM/php

Attachment (1)

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

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USNRC REGION I  
ATLANTA, GEORGIA

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Duke Power Company  
McGuire Nuclear Station  
Response to Violation 50-369/83-16-02

Violation 50-369/83-16-02, Severity Level IV:

10 CFR 50, Appendix B, Criterion 2 as implemented by Duke Power Company Topical Report, Duke-1-A, Section 17.2.2 requires that activities affecting quality be controlled to assure that proper tools, documents and verification by inspection be accomplished.

Contrary to the above, on March 15 and 16, 1983 licensee activities requiring quality control were not implemented by the electrical technicians performing safety-related modifications in that:

- a. The electricians stripped insulation from Class 1E wiring with pocket knives. No appropriate tools for stripping electrical insulation have been specified nor were used.
- b. The electrical inspection procedure, M-41B serial number 2, used by the electricians does not define a "sample basis" relative to quality verification inspection of electrical terminations.
- c. The electricians wiring the main control console were using a controlled electrical tabulation document, MC1711-10 containing superseded documentation.

Response to Part a:

1. McGuire Nuclear Station agrees that one or more electricians were observed stripping Class 1E wire with a pocket knife; however, we do not agree that this constitutes a violation. The station, with support from Design Engineering Electrical Division, recognizes that proper utilization of a pocket knife for stripping wire, i.e., "pencil" in lieu of "ringing", is an acceptable practice which has caused no known operational problems or failures. The acceptable pocket knife stripping method is to penetrate the wire insulation at an acute angle similar to sharpening a pencil, hence, "pencil", and not penetrating the wire insulation at a ninety degree angle in a ring around the wire, hence, "ringing".

Various random tests have produced results that indicate pocket knife pencil has done less conductor damage than any other method of wire stripping.

Other appropriate tools for stripping electrical insulation, such as wire strippers, are issued as part of the electrician's tool pouch or at the electrician's request and are expected to be used as applicable.

2. N/A
3. No corrective steps were deemed necessary.
4. To further assure that acceptable techniques continue to be utilized, electricians at McGuire will again be apprised of the acceptable wire stripping techniques by August 1983. This information will include proper techniques for use of pocket knives and other wire stripping tools.
5. McGuire Nuclear Station is presently in full compliance.

Response to Part b:

1. Duke Power Company Quality Assurance Department denies that a violation has occurred in this area.

The term "sample basis" on Form M41B serial number 2 simply means that the inspector is to do enough inspections of work items to assure that the work is being done correctly. This work is repetitive and does not demand 100 percent inspection, but inspections are definitely required in varying amounts to suit the specific case at hand.

The inspectors are trained, tested and certified based on a documented program which assures their knowledge of the appropriate inspection methods and procedures. They are specifically trained in procedure M41. Based on this training and their experience, the inspectors make a determination of the amount of work items to inspect, so in this context "sample basis" is defined. Additionally, controls are established to provide QA/QC review of work activities (requiring QA/QC involvement) to assure QA cognizance of work in progress. This review assures necessary QC inspections have been performed for all work.

2. N/A
3. No corrective steps were deemed necessary.
4. No further actions are considered necessary.
5. McGuire Nuclear Station is presently in full compliance.

Response to Part c:

1. McGuire Nuclear Station agrees that the electricians were using a controlled document containing superseded documentation.
2. This violation occurred due to improper distribution of documents from document control.

3. Appropriate measures have been taken to correct this situation by issuing a Duke Power Non-Conforming Item Report which required a procedure change to eliminate improper distribution of documents.
4. In order to avoid further violations, the new procedure will be utilized to assure proper distribution of documents.
5. McGuire Nuclear Station is presently in full compliance.