

DUKE POWER COMPANY

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15 JAN 1984
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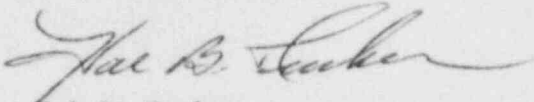
Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Re: RII:WPA
50-413/84-100

Dear Mr. O'Reilly:

Please find attached a response to Violation No. 413/84-100-01 as identified in the above referenced inspection report. Duke Power Company does not consider any information contained in this inspection report to be proprietary.

Very truly yours,



Hal B. Tucker

LTP/ibh

Attachment

cc: NRC Resident Inspector
Catawba Nuclear Station

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VIOLATION

10CFR50, Appendix B, Criterion V, requires that activities affecting quality be prescribed by documented instructions, procedures or drawings . . . and shall be accomplished in accordance with these instructions, procedures and drawings. DPC pipe support/restraint drawings 1-R-ND-1052, Revision 5; 1-R-ND-0265, Revision 3; 1-R-ND-0506, Revision 3; DPC Construction Procedure CP-385; and QA Procedure M-51 provide installation and inspection requirements for pipe support/restraint numbers 1-R-ND-0152, 1-R-ND-0265 and 1-R-ND-0506.

Contrary to the above, 12 noncompliances with procedure and drawing requirements were identified on pipe support/restraint 1-R-ND-0506, two noncompliances were identified on 1-R-ND-0265 and one noncompliance was noted on 1-R-ND-0152. 1-R-ND-0506 had been inspected and accepted by both Construction and Nuclear Production QC. 1-R-ND-0265 and 1-R-ND-0152 had been inspected and accepted by Construction QC.

RESPONSE

1. Duke Power Company admits the violation.
2. Cause of Violation

This violation can be categorized as 1) anticipated minor human errors associated with the number and complexity of inspections and 2) the failure to remove travel stops from spring cans. Eight of the noncompliances can be attributed to the Construction phase and are discussed in a letter to J P O'Reilly dated November 20, 1984 referencing Catawba Nuclear Station, Docket #50-413. The remainder of the noncompliance can be attributed to operation and/or maintenance or modification after construction.

3. Action

As a result of the inspector's audit, Nonconforming Item Reports (NCIR) CN-181, CN-192, and CN-193 were generated. All discrepancies identified as a result of the inspector's audit and Duke Power's follow-up audits are documented by these NCIR's. With the exception of travel stops not being removed from spring cans, all discrepancies were determined to be minor in nature and require no corrective action. As for the travel stop problem, a sample from all QA supports identified that only two other supports (both QA Condition 4) had travel stops still in place. Therefore, all accessible QA Condition 4 supports where spring cans were employed were rechecked. No other discrepancies were identified. In none of the three cases would the piping system fail to perform its intended function due to the remaining travel stops.

4. Corrective Action

As discussed above, all discrepancies, with the exception of the remaining travel stops, are minor in nature. It has also been shown that the remaining travel stops were an isolated incident in which no loss of intended function of the piping system would result. Therefore, no breakdown in the QA program is indicated by these findings.

To minimize recurrence of this problem Quality Assurance procedure F-13, Construction Procedure CP-424, Maintenance Procedure MP/O/A/7650/59 and MP/O/A/7650/53 and Maintenance Management Procedure 1.0 will be revised to ensure proper inspection of piping supports and any supports affected by modifications to supports. In addition, a new Construction Procedure CP-864 is being developed to minimize the type of nonconformances identified by the NCIR's.

5. Status

The new Construction Procedure and other procedure revisions referenced above will be implemented by February 15, 1985, Catawba Nuclear Station will be in full compliance at that time.