

DUKE POWER COMPANY

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HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

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January 24, 1985

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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: PHS/PKV
50-413/84-104
50-414/84-46

Dear Mr. O'Reilly:

Please find attached a response to Violation No. 413/84-104-01; 414/84-46-01 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
Hal B. Tucker

LTP/mjf

Attachment

cc: NRC Resident Inspector
Catawba Nuclear Station

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DUKE POWER COMPANY
CATAWBA NUCLEAR STATION
VIOLATION 413/84-104-01, 414/94-46-01

10CFR50, Appendix B, Criterion V and Criterion VIII, as implemented by Duke Power Company (DPC) Topical Report DUKE-1-A, Section 17.1.5.2 and 17.2.8 respectively requires that work performed on safety-related items be accomplished in accordance with the requirements of established procedures and requires measures to be established to identify and control materials to prevent use of incorrect materials. Construction Procedure CP-479, Rev. 8, Control of Surface Applied Materials prohibits use of teflon tape on stainless steel or in radiation areas. The DPC Station Power Chemistry Materials Guide also prohibits use of teflon tape on stainless steel or in radiation areas.

Contrary to the above, the requirements for use of teflon tape were not followed in that:

- a. Work was not performed in accordance with CP-479 in that teflon tape was utilized by construction personnel in various areas of the plant which are potential radiation areas and on stainless steel. Examples are the 2B Safety Injection Pump heat exchanger and stainless steel tail pieces at valves 2NR102, 2NV138, 2WE021, 2KF102 and 2KC040.
- b. Appropriate measures were not established for operations personnel implementing the restrictions on use of teflon tape contained in the Station Power Chemistry Materials Guide resulting in use of teflon tape on stainless steel in various potential radiation areas of the plant. Examples of Unit 1 areas where teflon tape has been used are the auxiliary building, mechanical penetration rooms, electrical penetration rooms and containment.

This is a Severity Level IV violation (Supplements I and II).

Response to Part (A)

1. Duke Power admits the violation as stated.
2. The reasons for the violation are: 1) "grafoil" tape, which is Construction's only approved substitute for teflon tape, is more difficult to work with and does not seal as well as teflon; and, 2) Construction Procedure CP-479 does not clearly identify which areas of the plant are potential radiation areas.
3. Nonconforming Item Report #19284 has been generated to resolve this problem. Preliminary results from Design indicate that our present requirements are overly conservative and that the restrictions for the use of teflon tape can be significantly reduced.
4. Once Design Engineering's evaluation is complete, the Power Chemistry Materials Guide and CP-479 will be revised and training performed accordingly.
5. Full compliance will be achieved by March 15, 1985.

Response to Part (B)

1. Duke Power admits the violation.
2. The violation occurred because Nuclear Production personnel did not review the Power Chemistry Materials Guide for restrictions on use of teflon tape prior to installing the tape in containment and the auxiliary building.
3. All teflon tape had been removed from containment. Approximately 200 vents and drains in the Auxiliary Building still have teflon tape on them. Since, preliminary results from Design Engineering indicate that the restrictions for use of teflon tape can be significantly reduced, leaving the teflon tape intact poses no safety problems for the near future. All tape installed by Nuclear Production in the Auxiliary Building will be removed by March 1, 1985.
4. Operators who would install teflon tape will be instructed on the restrictions involved regarding use of teflon tape.
5. Operators will be instructed and the tape installed by Nuclear Production in the Auxiliary Building will be removed by March 1, 1985. Catawba will be in compliance at this time.