DMB

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April 9, 1986

Dr. J. Nelson Grace, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Subject: RII:SJV
Catawba Nuclear Station
50-414/86-08

Dear Dr. Grace:

Please find attached a response to Violation No. 414/86-08-02, as identified in the subject Inspection Report.

Very truly yours,

Hal B. Tucker

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LTP:slb

Attachment

cc: NRC Resident Inspector
Catawba Nuclear Station

IE01

Violation:

Criterion V of Appendix B to 10 CFR Part 50, as implemented by FSAR Chapter 17, Section 17.1.5 states: "Activities affecting quality shall be accomplished in accordance with the instructions, procedures, or drawings."

The following procedural requirements apply to the Catawba 2 pipe support and restraint installation and inspection:

1. Construction Procedure CP-115 requires that anchor bolt washers be in full contact with baseplates.

2. Construction Procedure CP-635 requires that all non-NF welds be identified and listed on CP-635A forms and indicated on hanger sketches.

3. Final walkdown document (M-51C) requires QA sign-off.

Contrary to the above, procedures for the installation, inspection, and documentation for pipe supports/restraints have not been met in that,

1. On support 2-R-CA-1645, the southeast anchor bolt has a gap of 1/8-inch because the washer is contacting a hanger weld.

2. On support 2-R-CA-1645, and on hanger 2-R-NV-1083 the non-NF welds were not identified per CP-635.

3. Final walkdown documentation for hangers no. 2-R-NS-1119 and 2-R-CA-1021 were not signed by QA.

Response:

Duke Power Company denies the alleged violation. Each example cited in the notice of violation is addressed below:

1. This concern was documented on non-conforming item report QCK-1A CN-381. Support 2-R-CA-1645 was evaluated by Design and determined to be operable as is. Repairs have been made for long term effects and to increase safety margin. This situation is similar to a problem referenced in the "Quality Assurance Assessment of Construction Adequacy, IE Bulletins 79-02 and 79-14". This assessment determined this type of deviation was not significant and may exist even after detailed inspections are performed, and that when found each deviation should be evaluated and corrected. Based on this assessment and required action, we feel that each deviation when discovered should not constitute a violation.

2. These concerns were documented on QCK-1A-CN-383. The situation on 2-R-CA-1645 was that there were three non-NF weld symbols shown on sheet 1 of the hanger sketch, however, two of the welds run together to form one continuous weld.

The welding inspector involved considered the two welds that run together to be one weld, and numbered and inspected it as such. This method was acceptable per CP-22 and was therefore in accordance with the program. This should not be considered a violation.

There were two discrepancies cited on hanger 2-R-NV-1083:

a) The first discrepancy cited was that non-NF weld locations were not numbered on the hanger sketch per CP-635. Our practice is that non-NF weld locations are numbered by the inspector on the current sketch at the time of inspection for the purpose of documenting the inspections. If later revisions are issued, Construction Technical Support and QA review the revisions for determination of additional work and inspections. If the later revisions do not require additional work or inspections, the revisions are placed in the hanger package and there is no need to transfer any inspection information to the later revisions. The revision with the documented inspections remains in the hanger package. In the specific case of hanger 2-R-NV-1083, the hanger was erected and inspected to sketch revision D2 and the M-51C sketch. Each non-NF weld location was numbered on sketch revision D2. Revision D3 was issued to reflect the as-built condition after the erection and inspections were completed. Since sketch revision D3 did not require any rework or inspections, there was no need to again number the non-NF welds locations on this revision.

b) The second discrepancy cited was that non-NF welds that had been deleted due to redesign were not correctly identified or deleted on Form CP-635A. Our investigation indicates that no welds were deleted. Therefore, no discrepancy existed.

In summary, the above work meets our procedures and should not be considered a violation.

3. These concerns were documented on QCK-1A CN-383. The final QA review and signature is to provide additional assurance that the inspections required by the QA program have been performed. In the cases cited, the omission of the signatures at final QA review had no effect on quality as evidenced by the following facts:

a) QA procedures require the final walkdown inspections to be performed and documented.

b) The inspections had been performed and the forms had been signed by a QC inspector at least two weeks before the final QA review of the packages.

c) We have performed a review of a random sample of one hundred hanger packages and found no missing M-51C's or missing QA final review sign offs.

We consider the omission of these signatures to be a minor personnel error not significant enough to warrant a violation.