

DUKE POWER COMPANY

P.O. BOX 33189

CHARLOTTE, N.C. 28242

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October 31, 1985

TELEPHONE  
(704) 373-5531

HAL B. TUCKER  
VICE PRESIDENT  
NUCLEAR PRODUCTION

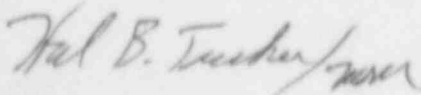
Dr. J. Nelson Grace, Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

Subject: Oconee Nuclear Station  
IE Inspection Report  
50-269/85-27  
50-270/85-27  
50-287/85-27

Dear Dr. Grace:

In response to your letter dated October 1, 1985 which transmitted the subject Inspection Report, the attached response to the cited items of non-compliance is provided.

Very truly yours,



Hal B. Tucker

PFG:slb

Attachment

cc: Mr. J. C. Bryant  
NRC Resident Inspector  
Oconee Nuclear Station

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## 1. Violation

10 CFR 50, Appendix B, Criterion V as implemented by Topical Report Duke 1-A Section 17.2.5 requires, in part, that activities affecting quality shall be accomplished in accordance with the requirements imposed by instructions, procedures, and drawings.

Transfer Requisition (TR) No. 852205 dated June 3, 1985, specified that filler metal must meet the requirements of ASME Section III, Subsection NB, Paragraph NB-2400. NB-2431(c) requires that weld test coupons be tested in the applicable post weld heat treated condition of the production weld.

Contrary to the above, on September 4, 1985, the inspector determined that filler metal received on TR-852205 had been receipt inspected, QA approved and issued to the field without meeting NB-2400 requirements, in that, no weld coupons had been tested in the heat treated condition. Moreover, this material had been used to fabricate certain welds requiring post weld heat treatment. A similar situation involving receipt and use of nonstress relieved material was identified on an earlier inspection and discussed with the licensee's representative who issued nonconforming item report O-730, dated February 3, 1982, to investigate and take appropriate corrective actions.

### Response

#### 1) Admission or denial of the alleged violation:

This violation is correct as stated.

#### 2) Reason for the violation:

This violation was a result of several personnel errors. Catawba Inventory Control erred by missing the special requirement that the welding material be impact tested and stress relieved as they prepared to ship the material to Oconee. These requirements did not mean anything to Catawba Inventory Control as they were more concerned with the welding material size and type. Catawba Projects QA, when completing the site sending C of C, stated that the material had been received and stored in accordance with the Projects QA Program, but failed to note the special requirements on the transfer requisition. When the welding material was received at Oconee, the receiving inspector only verified the presence of the site sending C of C as noted on the transfer requisition and did not check the material documentation against the special requirements of impact testing and stress relieved. The welding material was received and placed on the Released Welding Material Log, but was not listed as being impact tested and stressed relieved.

#### 3) Corrective steps which have been taken and the results achieved:

NCI O-1461 was issued on the receiving errors. The actual application of this filler material has been determined not to require stress relieving, and requisition 7310-852205 has been revised to remove the post weld heat treatment requirement.

All Released Welding Material Log entries were compared against their respective QA documentation packages to verify that those filler materials noted as being impact tested and stress relieved were properly noted on the log. Noted deficiencies from this review were identified on NCI No.'s 0-1495, 1496, 1532 and 1533. No field work is required. All log entries have been corrected.

4) Corrective steps which will be taken to avoid further violations:

All involved personnel are to be instructed to review transfer requisitions against the material requirements for the items being shipped and received as noted in the R-6A Significant Corrective Action Evaluation, for NCI 0-1461.

5) Date when full compliance will be achieved:

All corrective actions noted in (4) above are to be completed by December 1, 1985.

## 2. Violation

10 CFR 50.55a requires that structures shall be constructed to quality standards commensurate with the importance of the safety function to be performed. ASME Boiler and Pressure Vessel Code, Section IX, paragraph QW-407.2 requires weld procedure qualification tests be subjected to heat treatment essentially equivalent to that encountered in the heat treatment of production welds.

Contrary to this requirement, on September 4, 1985, main feedwater flow nozzle welds 1A, 1B, 1C, and 1D on ISOs 46 and 48, respectively, had been fabricated per Field Weld Data Sheet L-246, Rev. 2, which had been qualified to a weld procedure that did not require post weld heat treatment (PWHT).

This is a Severity Level IV violation (Supplement I).

### Response

- 1) Admission or denial of the alleged violation:

This violation is admitted as stated.

- 2) Reason for the violation if admitted:

This violation resulted from inadequate review of the selected weld procedures.

- 3) Corrective steps which have been taken and the results achieved:

The cited welds and procedures have been reviewed by Duke Design Engineering and Nuclear Production, and have been determined to be acceptable in meeting applicable codes. No re-work of the welds is required.

- 4) Corrective steps which will be taken to avoid further violations:

A weld documentation checklist will be developed to ensure proper review of weld cards and piping isometrics. Since the applicable weld procedure is specified on each weld card, future use of the checklist will assure that proper procedures are used for welding.

- 5) Date when full compliance will be achieved:

The checklist noted above will be implemented by January 2, 1986.

### 3. Violation

10 CFR 50, Appendix B, Criterion V as implemented by Topical Report Duke-1-A, Section 17.2.5 requires, in part, that activities affecting quality shall be accomplished in accordance with requirements imposed by instructions, procedures, and drawings.

Quality Control Procedure QCG-1 paragraph 4.4.1.c states, in part, that items shall be verbally released when the required QA documents are not present on site, but are located within the Duke system. Also, paragraph 4.5 of the same procedure states, in part, that items conditionally released shall be tagged with a "hold" tag and may be installed, but shall not be declared operable until the conditional release is cleared.

Contrary to the above, on September 6, 1985, the licensee failed to accomplish activities affecting quality in accordance with prescribed instructions, procedures, or drawings in that replacement Reactor Coolant Pump (RCP) studs were installed and Unit 2 reactor was returned to power prior to receiving final QA approval on the supplier's material quality records.

This is a Severity Level V violation (Supplement 1). This applies to Unit 2 only.

#### Response

- 1) Admission or denial of the alleged violation:

This violation is correct as stated.

- 2) Reason for the violation:

This violation was the result of a misunderstanding between Oconee QA and Vendors QA Division, resulting in personnel error. Site QA had received a verbal release on the studs and was not aware of any problems with the studs until April 17, 1985 at which time the QA Vendors Division notified Oconee QA of a possible paperwork problem. A misinterpretation of the procedural and Topical Report requirements, resulted in Unit 2 Start-Up without final written approval of the vendor documentation.

3) Corrective steps which have been taken and the results achieved:

Final approved QA documentation has been received from the QA Vendors Division and all items with the vendor, as documented on NCI 0-1234, have been corrected. An internal incident report has been written by the Oconee Safety Review Group (OSRG) citing personnel errors. All involved QA personnel have been counseled regarding their errors in this matter. Oconee QA and Vendors QA have met at Oconee concerning the actions that transpired leading up to and in correcting this incident. This interface meeting and counseling was beneficial in resolving the sequence of events and raising the awareness level of what the requirements are. Personnel errors involving site QA and Vendors Division Personnel have been adequately addressed.

4) Corrective steps which will be taken to avoid further violations:

Vendors QA will continue to monitor the vendor under their audit and surveillance program.

5) Date when full compliance will be achieved:

All corrective actions noted in (3) above were completed on September 3, 1985. The corrective action noted in (4) above is ongoing.