

Yellow

JUL 25 1988

Docket Nos. 50-413, 50-414
50-269, 50-270, 50-287
License Nos. NPF-35, NPF-52
DPR-38, DPR-47, DPR-55

Duke Power Company
ATTN: Mr. H. B. Tucker, Vice President
Nuclear Production Department
422 South Church Street
Charlotte, NC 28242

Gentlemen:

SUBJECT: ENFORCEMENT CONFERENCE SUMMARY
(NRC INSPECTION REPORT NOS. 50-413/88-07, 50-414/88-07,
50-269/88-03, 50-270/88-03 AND 50-287/88-03)

This letter refers to the Enforcement Conference held at our request on July 1, 1988. This meeting concerned activities for your Oconee and Catawba Nuclear facilities. The issues discussed at this conference related to environmental qualification of electrical equipment. A list of attendees, a summary, and a copy of your handout are enclosed. We are continuing our review of these issues to determine the appropriate enforcement action.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

Should you have any questions concerning this letter, please contact us.

Sincerely,

J. Nelson Grace
Regional Administrator

Enclosures:

- 1. List of Attendees
- 2. Enforcement Conference Summary
- 3. Handout

cc w/encls:

- J. B. Owen, Station Manager
- M. S. Tuckman, Station Manager

bcc w/encls: (See Page 2)

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PDR ADOCK 05000269
P PNU

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11201

Duke Power Company

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bcc w/encs:

- N. Jabbour, NRR
- NRC Resident Inspector - Oconee
- NRC Resident Inspector - Catawba
- DRS, Technical Assistant
- H. Pastis, NRR
- J. Lieberman, DOE
- G. R. Jenkins, EICS
- W. Potapovs, NRR/RVIB
- D. Wilson, NRR/RVIB
- Document Control Desk
- State of South Carolina
- State of North Carolina

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 07/13/88

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 TEConlon
 07/13/88

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 AHerdt
 07/13/88

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 AGibson
 07/15/88

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 TPeebles
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 JReyes
 07/20/88

RII
[Signature]
 GJenkins
 07/18/88

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~~MErnst~~
~~07/18/88~~

ENCLOSURE 1

List of Attendees
Enforcement Conference July 1, 1988

<u>Name</u>	<u>Title</u>	<u>Organization</u>
J. N. Grace	Regional Administrator	RII
H. B. Tucker	Vice President, Nuclear Production	DPC
L. Reyes	Director, Div. of Reactor Projects	RII
E. W. Merschoff	Dep. Director, Div. of Reactor Safety	RII
A. R. Herdt	Chief, Engineering Branch, DRS	RII
B. Uryc	Senior Enforcement Specialist	RII
P. K. VanDoorn	Senior Resident Inspector, Catawba	NRC
T. A. Peebles	Acting Branch Chief	RII
K. N. Jabbour	Project Manager, Catawba	NRR
A. B. Ruff	Electrical Engineer, PSS, DRS	RII
N. Merriweather	Electrical Inspector, PSS, DRS	RII
R. C. Wilson	Engineer	NRR
R. M. Glover	Catawba Compliance Engineer	DPC
J. E. Thomas	Senior Engineer	DPC
T. B. Owen	Station Manager, Catawba	DPC
M. S. Tuckman	Station Manager, Oconee	DPC
R. Neigerfind	EQ Engineer, Catawba	DPC
B. Smith	Senior Engineer	DPC
P. Guill	Licensing Engineer	DPC
P. LeRoy	Licensing Engineer	DPC
R. L. Dobson	Principal Engineer, Design Engr.	DPC
B. Bonser	Project Engineer	RII
J. F. Brown	Site Representative	NCEMC
D. M. Cameron	Site Representative	NCMPA-1
D. G. Browne	Co-Owner Liaison	DPC
T. E. Conlon	Chief, Plant Systems Section, EB:DRS	RII
J. Lee	Safety Analysis Engineer, Design Engr.	DPC
W. E. McAlister	Support Engineer, Oconee	DPC
D. E. Taylor	Projects Support Engineer, Oconee	DPC

ENCLOSURE 2

Oconee and Catawba
Enforcement Conference Summary

The licensee discussed the concerns listed in the environmental qualification inspection reports for electrical equipment. Duke Power Co. (DPC) considers that none of the violations identified in the Oconee and Catawba NRC reports warrant escalated enforcement and that the two items discussed below should not be violations.

- a. Oconee report, Item 88-03-04, Similarity Analysis for Oconee Installed Cables to Test Cables was not Adequately Established. DPC considers that their equipment qualification document packages (EQDPs) were adequate, auditable and that the installed cables were adequately identified so that they were traceable to purchase orders, specifications and EQDPs. This traceability and documentation showed that installed cables were the same or similar to the tested cables. The EQDPs were similar and/or the same as those for Catawba and/or McGuire.
- b. Catawba report, Item 88-07-06, The Cover Gasket on a Namco Limit Switch (LS) was Missing at One End. DPC states that this LS is not an EQ item and that it is included on the EQ master list to ensure that maintenance to the more conservative EQ requirements is applied to all class IE LS in the containment.

DPC stated that a detailed write up of their position and presentation, including appropriate documentation, would be submitted to the NRC within 30 days.

**ENFORCEMENT CONFERENCE AGENDA
DUKE POWER COMPANY
OCONEE NUCLEAR STATION
9:30 A.M., JULY 1, 1988
NRC/REGION II HEADQUARTERS BUILDING
ATLANTA, GEORGIA
ENVIRONMENTAL QUALIFICATION OF EQUIPMENT**

OPENING REMARKS

Hal Tucker

STATION EQ PROGRAM

Mike Tuckman

**DESCRIPTION and ANALYSIS
of INSPECTION FINDINGS**

**Jim Thomas
Bob Smith**

Inadequate Maintenance Procedures

Operability Evaluation of Problem Investigation
Report (PIR) (Unresolved Item)

Reactor Building Level Transmitter's Oil Level
Not at Top of Instrument Termination Junction Box

Installed Cable Similarity to Tested Vendor Specimens

High Range Radiation Monitors

**OVERALL ASSESSMENT OF OCONEE
INSPECTION RESULTS**

Jim Thomas

88-03-01 : Inadequate Maintenance Procedures

- **Duke concurs with the inspection report that the overall EQ maintenance program is acceptable and that the program is changing and improving.**
- **The inspection noted areas of concern requiring further clarification/ enhancement of maintenance procedures.**
- **None of the identified inadequacies resulted in unqualifiable equipment.**
- **All procedures concerning the inspection findings have been supplemented to provide the required clarifications.**

88-03-01 :

- ***It is Duke Power Company's position that this violation falls under Paragraph III of the enclosure to Generic letter 88-07(i.e., not sufficiently significant to be considered for escalation, and should be considered a severity level IV or V).***

**88-03-02 : Operability Evaluation Concerning
Problem Investigation Report
(PIR) 87-0231
(Unresolved Item)**

- **This item relates to an installation deviation discovered by Duke, evaluated as operable and documented under PIR 87-0231.**
- **During a review of PIR 87-0231 the inspector noted that the Operability Evaluation did not consider terminal block leakage currents caused by surface moisture film.**
- **It should be noted the original evaluation did include an analysis considering condensation and its effects. .**
- **Additional information was provided following the inspection demonstrating that leakage currents caused by surface moisture films are not a failure mechanism for the Ocone application.**
- **The installation was qualified and the file will be updated to clarify that leakage currents are insignificant.**

**88-03-03 : (Also used as example in
Violation 88-03-01)**

**Reactor Building Level
Transmitter Oil Level Not to Top
of Junction Box**

- **During the walkdown the inspector noted that the oil level in the Reactor Building level transmitter junction box was not to the top and not in the "as-tested" configuration.**
- **The oil level had been lowered during a maintenance activity after initial installation and was not fully refilled.**
- **The junction box is gasketed and the cable entrance is sealed.**
- **Duke demonstrated during the inspection the condition was qualifiable for this application.**
- **Duke evaluation was found acceptable.**
- **Procedure revised to require verification of proper oil level each refueling outage.**

88-03-03 :

- ***It is Duke Power Company's position that this violation falls under Paragraph III of the enclosure to Generic letter 88-07(i.e., not sufficiently significant to be considered for escalation, and should be considered a severity level IV or V).***

**88-03-04 : Similarity Analysis for Installed
Cable to Tested Vendor Specimens**

- **Section 13.c(9) of the inspection report states, "None of the cable files reviewed included similarity analysis addressing installed equipment and tested vendor specimens. Additionally, most of the files did not specifically identify or describe plant installed equipment".**
- **As noted in the inspection report, Duke does take exception to the violation as stated.**
- **The installed cable insulation and jacket materials are specifically identified on the title page of all cable equipment qualification documentation packages(EQDP).**
- **All cable EQDP's identify the installed cable configurations via the Duke Power cable mark number.**
- **This number delineated the cable configuration by identifying the number of conductors or pairs, conductor AWG size, voltage rating, and other construction information.**

88-03-04

- **Through the cable mark number, along with purchase requisitions provided during the inspection, the cable thickness(voltage rating) can be determined.**
- **Although the purchase requisitions are not part of the EQDP, the cable mark numbers are referenced in the EQDP and on the appropriate purchase requisition.**
- **Vendors certify that cable procured on an applicable purchase order is environmentally qualified per the applicable test report. This certification also confirms the installed cable is identical to the tested cable.**
- **The vendor certification is included in the EQDP for each cable type.**
- **It should also be noted, as stated in the inspection report, traceability and qualification was demonstrated during the inspection.**

88-03-04

- ***It is Duke Power Company's position that the cable EQDP's were adequate .***
- ***Duke considers the EQDP's to be auditable.***
- ***Clarifications have been added to the EQDP's to simplify auditability.***

88-03-05

- ***It is Duke Power Company's position that this item is a documentation/auditability violation and falls under Paragraph III of the enclosure to Generic Letter 88-07(i.e., not sufficiently significant to be considered for escalation, and should be considered a severity level IV or V).***

88-03-05 :

- **Duke made decision(August 8, 1983) to replace all connectors and junction box with Duke qualified cable, Duke qualified splices, and Duke qualified potting**
- **Victoreen reviewed and provided on site assistance during initial installation(August 9, 1983)**
- **Qualification reports on file during audit for all segments of Duke modification**
- **Victoreen EQ report had not been addended to reference Duke reports**
- **Duke drawings reflected the installed Duke design**
- **Duke configuration is fully qualified**
- **Victoreen EQ files have been supplemented for clarification**

**88-03-05 : Inadequate Documentation of
Installed Configuration for the
Victoreen High Range Radiation
Monitors**

- **Victoreen Configuration**
 - **Detector with integral male connector**
 - **Pigtail with female connector (pigtail coax soldered to back of female and potted, covered by braided hose with swagelok)**
 - **Junction box**
 - **Field cable with penetration connector**
- **Duke experienced operational problems with Victoreen connectors and junction box**

OCONEE INSPECTION OVERVIEW

88-03-01 : Inadequate Maintenance Procedures

- **Overall Program Adequate**
- **Clarifications/Enhancements of Procedures Incorporated**

88-03-02 : Operability Evaluation of PIR

- **Duke Identified Discrepancy**
- **Operability Considered Acceptable by Duke**
- **Supplemental Information Demonstrates Inspection Concerns (leakage currents) Insignificant for Oconee Application**

88-03-03 : Reactor Building Level Transmitters Oil Level

- **Qualification Demonstrated During Inspection**
- **Maintenance Procedure Clarified**

OVERVIEW (CONTINUED)

88-03-04 : Cable Similarity

- **Duke Position that Files are Complete**
- **Clarifications Provided During Inspection Confirmed Qualification and Auditability**

88-03-05 : High Range Radiation Monitors

- **Installed Configuration Qualified**
- **File Supplemented to Clarify Vendor Scope of Qualification**

DUKE ASSESSMENT OF INSPECTION

FINDINGS

- ***Duke concurs with the inspection report that Duke has implemented a program to meet the requirements of 10CFR50.49 for the Oconee Nuclear Station.***

- ***Duke concurs with the inspection report that Oconee Nuclear Station has an acceptable EQ maintenance program.***

- ***The maintenance discrepancies identified in the inspection have been reviewed and procedures enhancements incorporated.***

- ***Based on the extent and depth of the inspection, the Duke assessment is that there are no programmatic problems with the EQ program.***

- ***Limited Number of Findings***

- ***Lack of Safety Significance of violations identified during the inspection (no equipment modifications required)***

ASSESSMENT(CONTINUED)

- ***Duke does not consider any of the deficiencies discovered during the inspection sufficiently significant to be considered for escalated enforcement, individually or collectively.***

- * ***No Programmatic Problems***

- * ***Limited Findings Affecting Limited Systems***

- * ***No Equipment Modifications Required (All equipment qualified or qualifiable)***

**ENFORCEMENT CONFERENCE AGENDA
DUKE POWER COMPANY
CATAWBA NUCLEAR STATION
JULY 1, 1988
NRC/REGION II HEADQUARTERS BUILDING
ATLANTA, GEORGIA
ENVIRONMENTAL QUALIFICATION OF EQUIPMENT**

**DESCRIPTION and ANALYSIS
of INSPECTION FINDINGS**

**Jim Thomas
Bob Smith**

EQ Files Support of Four-to-One Electrical
Tape Splice Used on Hydrogen Recombiners

RCS (NC) wide Range RTD's not Installed in
Accordance with the Tested Configuration

Limitorque Motor Operated Valves in the
Containment Air Return and Hydrogen Skimmer
(VX) System

Joy Reliance Fan Motors Without Breather-Drains

EQ Files Support of Minco RTDs

Namco Limit Switch Improper Installation

Limitorque Operators Without T-Drains Installed

T-Drains Not Installed at Low Point(Unresolved Item)

AGENDA(CONTINUED)

STATION EQ PROGRAM

**Tony Owen/Ralph
Neigenfind**

Administrative Controls

Implementation and Training

Program Enhancements

**OVERALL ASSESSMENT OF CATAWBA
INSPECTION RESULTS**

Jim Thomas

CLOSING REMARKS

Hal Tucker

**88-07-01 : Inadequate Documentation of
Qualification of Splices for
Hydrogen Recombiners**

- **As discussed in the inspection report, qualification was demonstrated during the inspection.**
- **Splice is consistent with manufacturers recommendation and Duke design documentation.**
- **The documentation which demonstrates qualification of the tape splices was on file but was not specifically referenced in the Hydrogen Recombiner EQ Package.**
- **As demonstrated during the inspection, the tape splices are qualified for this application and Duke has placed on file an EQ package which specifically addresses the recombiner splices. This document ties together the test reports which were presented to the inspectors during the inspection.**

88-07-01

- ***It is Duke Power Company's position that this finding falls under Section III of the enclosure to Generic Letter 88-07 (i.e., not sufficiently significant to merit escalated enforcement)***
- ***In that qualification was demonstrated during the inspection, the item should be considered severity level IV or severity level V.***

**88-07-02 : RCS Wide Range RTDs not
Installed in accordance with
Tested Configuration.**

- Licensee identified violation, reported by LER, and corrected prior to inspection.
- During an inspection of Raychem splices by Design Engineering, the NEMA 4 junction box for the RTD/cable splice was questioned in regard to meeting the vendor requirement for a "sealed" box.
- The condition was evaluated by Design Engineering to be operable, but a modification was made to pot the entire junction box to minimize moisture induced leakage current effects on instrument accuracy.
- In the process of finalizing the modification, an installation error was detected.

- **An unqualified condition had resulted from misinterpretation of notes on drawings during initial installation.**
- **Duke standard practice is to add flex conduit for additional mechanical protection if vendor supplied cable is not armored.**
- **RTDs are provided with braid, not armor.**
- **Craft had inadvertently removed underlying bellows in attempt to replace braid with flex conduit.**
- **As noted in the inspection report, the fix is fully qualified and no finding was identified for the EQ package.**
- **It is Duke Power Company's position that the original installation was unqualified.**
- **The condition was identified, reported, and corrected by Duke prior to the inspection.**

- **Duke does not consider this item to meet the criteria (Generic Letter 88-07, Section II) for "clearly knew or clearly should have known"**

- **In that regard, this specific equipment was evaluated during the March 6-8, 1984 NRC EQ audit of Catawba (prior to receipt of Unit 1 fuel load license).**
 - * **The installation deficiency was very difficult to detect, even by experienced walkdown personnel!**

 - * **As documented in the Catawba SER, this equipment was specifically inspected to verify the installation was consistent with the qualification documentation.**

 - * **The installation deficiency was not detected, even though it was a specific objective of the walkdown.**

88-07-03 : Incorrect Valves Supplied by Vendor(VX System)

- **This condition was discovered by Duke in 1984 during the construction phase.**
- **Operators supplied by the vendor were not in compliance with the Duke specification although all related vendor supplied paperwork indicated compliance. Vendor committed to provide replacement valves.**
- **Duke evaluated the valves for upper containment application and concluded the valves to be acceptable.**
- **During a January, 1986, inspection concerning lubrication, the completeness of the Duke evaluation was questioned in regard to lubrication. Justification for the lubrication adequacy was provided to supplement the EQ file to demonstrate qualification.**
- **Replacement valves received from vendor were installed in Unit 1 in February, 1986 (1st refueling outage). The Unit 2 valves were replaced before initial criticality.**

88-07-03

- **Duke did not interpret the April 17, 1986 NRC Report No.50-413/86-05(lubrication audit) to indicate that the supplemental EQ information for the previous installation was insufficient. No further action was taken concerning the EQ file for the previous installation.**
- **Follow-up review of the superseded EQ file during February, 1988 EQ audit resulted in additional questions concerning the need for subcomponents to be specifically addressed in the file.**
- **Supplemental information addressing the additional questions demonstrates the operators were qualified for the required environmental conditions.**

88-07-03

- ***It is Duke Power Company's position that this violation is strictly a documentation concern. This violation falls under Paragraph III of Generic letter 88-07(i.e., not sufficiently significant to be considered for escalation, and would be considered a severity level IV or V).***

88-07-04 : Fan Motor Breather-Drains

- **The breather-drains on the originally supplied fan assemblies were installed by Joy prior to shipping.**
- **Two (2) spare motors were ordered by Duke from Joy in 1981.**
- **The Hydrogen Skimmer Fan assemblies were returned to Joy for repair in 1985.**
- **Duke returned the 1981 procured motors to Joy as the replacement motors to be assembled on the repaired fans.**
- **The repaired fan assemblies were shipped back to Duke without installed breather-drains.**

88-07-04 :

- **During the walkdown, the inspector noted breather-drains missing.**
- **Evaluation demonstrating qualification without breather-drains was presented during the inspection.**
- **A formal calculation demonstrating qualification was provided to the NRC.**
- **Installation drawings have been revised to include specific reference to install breather-drains for conservatism.**

88-07-04

- ***It is Duke Power Company's position that this violation falls under Paragraph III of Generic Letter 88-07(i.e., not sufficiently significant to merit escalated enforcement, and would be considered a severity level IV or V).***

**88-07-05 : MINCO RTDs - Termination
Submergence**

- **Inspector unable to physically examine the termination of the RTDs due to time restraint.**
- **Duke provided documentation demonstrating sufficient length of mineral insulated cable had been ordered with RTD to accommodate termination above flood level.**
- **Inspector expressed concern that he had observed installations at other utilities with cable coiled at termination box.**
- **During the inspection, the inspector indicated that information had been provided by another utility and, based on the inspector's knowledge of this application, the configuration should be qualifiable even if submerged.**
- **Duke walked down RTDs subsequent to inspection in response to inspectors concern.**

88-07-05 :

- **Duke notified NRC of walkdown results that some terminations were below flood level.**
- **Duke also provided the NRC with documentation and test performance data demonstrating the RTD terminations were qualifiable for submergence.**
- **Inspector found the method of qualification acceptable.**

88-07-05

- ***It is Duke Power Company's position that this documentation deficiency falls under Paragraph III of the enclosure to Generic Letter 88-07(i.e.- EQ violation not sufficiently significant to merit escalated enforcement, and would be considered a severity level IV or V).***

88-07-06 : NAMCO Limit Switch Cover Gasket

- **During the Unit 2 walkdown, a cover gasket was noted to be improperly installed(no other limit switches were found with installation deviations during the inspection).**
- **Evaluation of the function of the limit switch indicated the switch was not required to be on the Master List.**
- **The switches are included for maintenance consistency and conservatism.**
- **An inspection of accessible Unit 1 and 2 inside containment NAMCO limit switches and all Unit 2 switches required for control functions has been completed. None of these other switches were found with installation deviations.**

88-07-06 :

- **All remaining inside containment NAMCO limit switches will be inspected at next outage of sufficient duration.**
- **An inspection of the outside containment NAMCO limit switches has also been completed and although some problems were found and corrected, these switches were not required to be on the Master List. The NRC was notified by courtesy call.**
- **Installation procedures have been refined/revised to preclude a recurrence of this situation.**
- **This item was specifically addressed during subsequent station technician EQ training.**

88-07-06

- ***It is Duke Power Company's position that this violation falls under Paragraph IV.B of Generic Letter 88-07(i.e., Duke demonstrated at the time of the inspection that this switch was not required to be on the EQ list and therefore should not be considered for enforcement action).***

88-07-07 : Limitorque T-drains

- **As documented in the inspection report, there was an extensive review of the Limitorque EQ files with no deficiencies found.**
- **The only item of concern that was determined during the inspection of the actuators was the possibility of the T-drains being plugged with paint.**
- **The principal purposes for use of T-drains are, 1) to provide drainage of internal actuator condensation; and 2) to serve as the primary vehicle for internal-to-external pressure equalization.**
- **Duke provided an analysis as to the functional operability of those actuators found without T-drains or with T-drains painted over.**
- **It was demonstrated by the analysis that clogged or missing T-drains on the affected actuators did not compromise safety for the period this situation existed.**

88-07-07

- **The corrective actions outlined in the analysis have been completed:**
 - * **The Construction & Maintenance Department has retrained painters**
 - * **Station Instrumentation and Electrical procedures have been revised to clarify T-drain installation requirements**
 - * **Formal T-drain specific training for appropriate personnel has been completed**

88-07-07

- ***It is Duke Power Company's position that this violation falls under Paragraph III of the enclosure to Generic Letter 88-07(i.e., EQ violation not sufficiently significant to merit escalated enforcement, and would be considered a severity level IV or V).***

**88-07-08 : T-Drains on Limitorque Operator
not Installed at Low Point
(Unresolved Item)**

- **During the walkdown the inspector noted that the T-drains on operator 2NI-122B were not installed at the low point.**
- **Limitorque Qualification Report B0058 states that the operator was tested "in the worst possible position"(i.e., limit switch compartment up and the motor horizontal) and considers operators qualified for all orientations.**
- **Limitorque provides no restrictions on operator orientation other than to minimize motor down positions.**
- **The Nuclear Utility Group on Equipment Qualification (NUGEQ) Limitorque Clarification Report provides guidance for installation of T-drains for motors whose principal axis is vertical.**
- **2NI-122B met all of the required guidelines and is therefore in an environmentally qualified configuration.**

OVERVIEW

88-07-01: Hydrogen Recombiner Tape Splice

- **Installed Configuration Qualified**
- **Issue more related to auditability**

88-07-02 : RCS Wide Range RTDs

- **Installation Error**
- **Misinterpretation of Drawings**
- **Discovered and Reported by Duke**
- **Immediate Corrective Action
(Unit shutdown)**

88-07-03 : VX Motor Operated Valves

- **Previous Installation Configuration
was Qualified**
- **Completeness of File Issue**
- **Equipment Replaced for
Conservatism**
- **Replacement Operators are Fully
Qualified**

DUKE ASSESSMENT OF INSPECTION **FINDINGS**

- ***Duke concurs with the inspection report that Duke has implemented a program to meet the requirements of 10CFR50.49 for the Catawba Nuclear Station.***
- ***Duke concurs with the inspection report that an acceptable EQ maintenance program is in effect and maintaining equipment in a qualified state.***
- ***The maintenance discrepancies identified in the inspection have been reviewed and training enhancements incorporated.***
- ***As discussed in the inspection report, Duke had previously identified the need for training enhancements. Enhancements being implemented during the inspection have been completed.***

OVERVIEW(CONTINUED)

88-07-04 : Fan Motor Breather-Drains

- **Equipment Qualifiable without Drains**
- **Vendor Maintenance Error**
- **Drains to be Installed for Conservatism**

88-07-05 : MINCO RTDs

- **Installed Configuration Qualified**
- **Design Oversight**

88-07-06 : NAMCO Limit Switch

- **Specific Equipment not Required**
- **Failure to Follow Construction Installation Procedure**
- **Subsequent Walkdowns Revealed No EQ Deficiencies**

88-07-07 : Limitorque T-drains

- **Qualification Not Compromised**
- **Lack of EQ Precautions in Painting Procedures**

88-07-08 : 2NI-122B T-drains

- **(Unresolved Item)**
- **Qualified Configuration**

ASSESSMENT(CONTINUED)

- ***Based on the extent and depth of the inspection, the Duke assessment is that there are no programmatic problems with the EQ program.***

- * ***Limited Number of Findings***

- * ***Lack of Safety Significance of violations identified during the inspection (no equipment modifications required)***

ASSESSMENT(CONTINUED)

- ***It is Duke's position that the EQ violation(RdF RTDs) identified by Duke prior to the inspection does not meet the "clearly knew" or "clearly should have known" criteria and therefore is not subject to enforcement action.***

- ***In addition, the following mitigating factors apply to the Rdf RTDs:***
 - (1) The violation was limited and affected only one (1) system***

 - (2) The violation was identified by Duke prior to the inspection***

 - (3) The violation was promptly reported by LER to the NRC***

 - (4) The violation was corrected and full compliance was achieved within a reasonable time(Unit shutdown for fix)***

 - (5) Duke had demonstrated best efforts to complete EQ within deadline***

ASSESSMENT(CONTINUED)

- ***Duke does not consider any of the deficiencies discovered during the inspection sufficiently significant to be considered for escalated enforcement, individually or collectively.***

- * ***No Programmatic Problems***

- * ***Limited Findings Affecting Limited Systems***

- * ***No Equipment Modifications Required***