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RA-19-0357

10 CFR 2.201

September 12, 2019

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: Duke Energy Carolinas, LLC
Catawba Nuclear Station, Unit 1
Docket No. 50-413
Reply to a Notice of Violation - NRC Inspection Report 05000413/2019002-04

References: 1. NRC Letter to Duke Energy Carolinas, LLC, Catawba – NRC Integrated Inspection Report 05000413/2019002, 05000414/2019002, 07200045/2019002, and Notice of Violation, dated August 14, 2019 (ADAMS Accession No. ML19226A096)

2. Duke Energy letter to NRC, LER 2019-002-00 for Catawba Nuclear Station, Unit 1, Condition Prohibited by Technical Specifications due to Auxiliary Feedwater Sump Pump Conditions, dated June 10, 2019 (ADAMS Accession No. ML19161A254)

The enclosure to this letter provides Duke Energy's reply to the Notice of Violation contained in the enclosure to Reference 1 letter (05000413/2019002-04), dated August 14, 2019. The Notice of Violation was associated with a Licensee Event Report (LER) that Duke Energy submitted on June 10, 2019 (Reference 2), that the licensee failed to accurately state that the auxiliary feedwater sump pump condition that occurred on January 19, 2019, represented an event or condition that could have prevented fulfillment of a safety function.

There are no regulatory commitments contained in this submittal. If you have any questions regarding this submittal, please contact M.B. Hare at (803) 701-2218.

Sincerely,

Tom Simril
Vice President, Catawba Nuclear Station

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1.0 Restatement of the Violation

10 CFR 50.9(a), states that "Information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material aspects."

Contrary to the above, on June 10, 2019, the licensee failed to provide complete and accurate information in Licensee Event Report (LER) 05000413/2019-002-00, "Condition Prohibited by Technical Specifications due to Auxiliary Feedwater Sump Pump Conditions." Specifically, the LER failed to accurately state that the auxiliary feedwater sump pump condition that occurred on January 19, 2019, represented an event or condition that could have prevented fulfillment of a safety function, as required by 10 CFR 50.73(a)(2)(v)(A), (B), and (D). This information is material to the NRC because it is used to determine compliance with reportability requirements, and is used in NRC regulatory oversight functions, including licensee performance assessment, and inspection.

This is a Severity Level IV violation (NRC Enforcement Policy Section 6.9).

2.0 Reason for the Violation

The reason for the violation is that the licensee did not recognize the condition that occurred on January 19, 2019, represented an event or condition that could have prevented fulfillment of a safety function, as required by 10 CFR 50.73(a)(2)(v)(A), (B), and (D).

On January 19, 2019, during the performance of a planned activity for an approved test procedure enclosure, the Turbine Drive (TD) Auxiliary Feedwater (AFW) pump #1 was declared inoperable due to both TDAFW #1 sump pumps discharge valves being closed. Additionally, both the 1A and 1B Motor Driven Auxiliary Feedwater (MDAFW) sump pump discharge valves were closed for their respective pump. These pumps are all located in the same room (AFW pump room) in the Auxiliary Building.

A new Auxiliary Building flooding calculation was completed and has shown that, in the event of a feedwater line break in the interior doghouse coincident with a loss of offsite power, the AFW pump room would eventually fill with water and flood out the MDAFW pump in 11.7 hours with no available sump pumps and no other actions to mitigate the flooding.

The non-functional 1A and 1B MDAFW sump pumps should have also been evaluated for impact on the MDAFWs operability, while taking into consideration the now recognized support function. Given the new information, the MDAFW should have been declared inoperable for the times that their corresponding sump pumps were out of service. This condition was reported in Catawba LER 19-002-00 as a condition prohibited by Technical Specification (TS) given the MDAFWs were inoperable for a period longer than the allowed completion time of TS Limiting Condition for Operation (LCO) 3.7.5, Condition B and C.

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As supported by the discussion in Section C.10 of IMC 0326, the support function impact on the operability of the MDAFWs was framed in the context of the 11.7 hours leading up to the flooding of the AFW pump pits. The event on January 19, 2019, where all AFW sump pumps were concurrently determined to be non-functional spanned a time of 53 minutes (as indicated by door records with auxiliary operators entering and leaving the pump room). During this time, four auxiliary operators were stationed in the AFW Pump room while administering a planned activity using an approved test procedure. In the event of a feedwater line break in the interior doghouse, Operators could have backed out of the test procedure and restored functionality of the sump pumps long before the 11.7 hours required for the AFW pump room to fill with water and flood out the AFW pumps. For this reason, it was believed that the condition that occurred on January 19, 2019, did not represent a loss of safety function for the Auxiliary Feedwater System as defined by 10 CFR 50.73(a)(2)(v)(A), (B) or (D).

Catawba understands that, even while the MDAFWs remained 'available' to perform their TS Safety Function, the condition of the TDAFW #1 inoperability, and the 1A and 1B MDAFW sump pumps discharge valves simultaneously being closed, represents a condition of inoperability for the auxiliary feedwater system. As further discussed in 10 CFR 50.73(a)(2)(vi), redundant equipment in the same system may only be credited in the context of this reporting criteria when both "operable and available" to perform the required safety function. Therefore, the LER that was submitted on June 10, 2019, should have also been reported as a loss of safety function.

3.0 Corrective Steps That Have Been Taken and the Results Achieved

In response to this violation, the identified condition was entered into Duke Energy's corrective action program.

The test procedure has been revised to only be performed in a mode of applicability in which AFW is not required for Operability.

A lessons learned communication has been distributed to site stakeholders in Regulatory Affairs, Operations, and Engineering on reportability requirements regarding 10 CFR 50.73(a)(2)(v)(A), (B), and (D).

Duke Energy submitted LER 2019-002-01 on September 11, 2019, to indicate the loss of safety function of the Auxiliary Feedwater System on January 19, 2019. This action was taken to restore compliance.

4.0 Corrective Steps That Will Be Taken

Training will be performed for site stakeholders in Regulatory Affairs, Operations, and Engineering on reportability requirements regarding 10 CFR 50.73(a)(2)(v)(A), (B), and (D).

5.0 The Date When Full Compliance Will Be Achieved

Full compliance was achieved on September 11, 2019, when Duke Energy submitted LER 2019-002-01.