



DUKE POWER

May 21, 1991

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

Subject: Catawba Nuclear Station, Units 1 and 2
Systematic Assessment Of Licensee Performance
NRC Inspection Report Nos. 50-413/91-05, 50-414/91-05

Gentlemen,

Mr. Stewart D. Ebnetter's letter dated April 15, 1991 transmitted the initial SALP report for Catawba Nuclear Station for the period November 1, 1989 through February 2, 1991. The report was discussed with Duke Power representatives during a meeting held on April 23, 1991.

Generally, I am in agreement with the NRC Staff's assessment of Catawba's performance over the 15 months which the SALP report addresses. The plant did have a four month period during the initial phase of the evaluation period in which plant operations did not meet Duke Power management expectations. Immediate corrective actions were taken which improved overall plant performance, and I am confident it will continue to improve. As discussed in the SALP report, the improvements initiated by Duke Power were also evident to the SALP board members.

During the SALP meeting on April 23, 1991, I expressed my concern that the "2" rating in the Safety Assessment/Quality Verification (SA/QV) category did not accurately represent the performance of the plant and the supporting organizations. It is my belief that a "2 Improving" more accurately describes the company's performance in this area as discussed below.

Many of the programs implemented by Duke Power in the SA/QV category are generic within the Nuclear Production Department. The SA/QV programs are the same for all three Duke Power Nuclear Stations, the General Office Licensing activities are handled in a generic manner, and the Safety Review Group activities at the three stations are very similar. The McGuire Nuclear Station received a Superior rating in the SA/QV category which attests to the quality of these various programs.

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I recognize that Catawba had some performance problems at the beginning of the SALP period, and that these problems may have been avoided if the corrective actions resulting from the events were initiated earlier. It should not be discounted, however, that the tremendous improvements in station performance were a direct result of a thorough assessment of the station activities. These improvements were recognized by the SALP board and contributed to the overall "2" rating in Plant Operations, as well as a "1" in Security which was previously a "2 Declining". Once again, these changes were a result of a thorough self assessment of the station activities and the implementation of numerous programs designed to improve performance. It is evident to me that the station's self assessment continuously improved over the SALP period and was effective in identifying the root cause of the station's previous poor performance.

The overall station's performance has also improved. Many initiatives were taken to close out the backlog of regulatory issues on Catawba's docket. Numerous License Amendments over 2 years old were withdrawn. Additional analyses were performed to resolve the Main Steam Line Break inside containment issue, and additional demonstration runs of the steam Generator Tube Rupture scenario were committed to in order to reach closure with the NRC Staff on this issue. Management attention has also resulted in improved communications with the Staff.

Based upon the considerations detailed above, I request that the Safety Assurance/Quality Verification rating be revised to reflect a "2 Improving" level of performance.

Very truly yours,



Hal B. Tucker

MHH/SALP

xc: S. D. Ebnetter
Regional Administrator, Region II

R. E. Martin, ONRR

W. T. Orders
Senior Resident Inspector