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## DUKE POWER

January 6, 1994

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

Subject: Catawba Nuclear Station

Dockets Nos. 50-413 and 50-414

Supplemental Response

Notice of Violation No. 50-413, 414/93-26

Attached is supplemental information concerning our Reply to Notice of Violation 50-413, 414/93-26. In a telephone conversation on December 15, 1993, between M. Lesser of your staff and Z. Taylor, Catawba Nuclear Station agreed to supplement the response regarding Catawba's policy for scheduling work activities on an operable train of safety related equipment while the opposite train is inoperable, provided the work does not effect operability. This verbal agreement was documented in your letter dated December 16, 1993.

If there are any additional concerns or questions regarding this matter, please feel free to contact Zach Taylor at (803) 831-3212.

Very truly yours,

D. L. Rehn

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XC: S. D. Ebneter

Regional Administrator, Region II

R. E. Martin, NRR

R. J. Freudenberger Senior Resident Inspector

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## DUKE POWER COMPANY CATAWBA NUCLEAR STATION SUPPLEMENTAL RESPONSE TO VIOLATION 413,414/93-26-02 WORK SCHEDULING PHILOSOPHY

It would be under very unusual circumstances that tasks would be scheduled on the operable train of a system while its redundant train is inoperable. Catawba's Work Control group typically rotates "same-train" tasks on a weekly basis when these trains are scheduled to be removed from service. In other words, weeks are categorized by "A Train", "B Train", and "No Train" (Example: Auxiliary Feedwater Turbine-Driven Pump related tasks; usually only a few days at the end of an "A" or "B" train week).

However, while Technical Specifications requires a particular system's train to be operable as well as its related support equipment available of performing their functions, it does not prevent the removal from service of unrelated same train equipment. In this case, work was permitted in cabinets which contained components associated with various systems (cabinet components are same train). For example, it is possible that the Waste Liquid System (WL) "A Train" components might share a common electrical cabinet with the operable Control Room Ventilation System (VC) "A Train" components, along with components from several other "A Train" systems. The scheduling of work on WL System "A Train" equipment not required for operability in the common electrical cabinet is permissible, provided it does not impact VC "A Train" operability.

It is felt that the corrective actions outlined in the initial response relative to proper self-checking/independent verification will avoid recurrence, as opposed to additional restrictions on the scheduling of work activities.