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DUKE POWER

December 19, 1990

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

Subject: Catawba Nuclear Station, Units 1 and 2
Docket Nos. 50-413 and 50-414
NRC Inspection Report No. 50-413, 414/89-09
Inspector Follow-up Items
Request for Commitment Date Extension

Gentlemen:

Inspection Report 50-413, 414/89-09 identified several Inspector Follow-up Items (IFI) involving weaknesses in the maintenance of plant emergency and abnormal procedures. Mr. H. B. Tucker's letter dated October 10, 1989 provided our reply to these items. Attached are revised responses to specified Inspector Follow-up Items in Inspection Report 89-09.

A full review and reissue of the emergency and abnormal procedures was to be completed on December 31, 1990. Due to reductions in available resources and the interjection of other required work activities, the review and reissue process will take another five months to complete. The weakness involving labeling of the steam generator steam pressure meters has not been fully resolved due to a relabeling error that will require correction during the next refueling outage.

Portions of the Inspector Follow-up Items have been completed. All IFI weaknesses related to the EP/AP Writer's Guide have been addressed in the reissue of this document on May 31, 1990. With the exception of one meter (1SMP-5160, S/G 1C SM Press), all Control Room steam generator steam pressure gauges were relabeled during respective unit refueling outages to show the proper red range markings.

An extension of the commitment date to the end of U1E0C5, (currently scheduled for June 1991), is requested.

Very truly yours,

M. S. Tuckman, Vice President
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REPLY TO A WEAKNESS (IFI)
D-413,414/89-09-11

There are many significant deviations between the EOPs and the PSTG (Plant Specific Technical Guidelines) where there should be none. This is primarily due to changes being made in the EOPs before being made in the guidance document (PSTG). (Paragraph 3 and Appendix B).

RESPONSE:

1. Corrective Action Taken and Results Achieved

A plan has been agreed upon between the Safety Analysis section and the station Document Development section to review all the comments in Appendix B listed as PSTG Deviations. The result of this review will be a change to either document so that the difference in guidance is eliminated. Technical Verification of the EOPs, a required step in the Verification and Validation program, will serve as the process by which this plan will be implemented. The Safety Analysis section performs the Technical Verification process. All of the identified deficiencies will be corrected through this review process by the end of U1EOC5.

2. Corrective Action to be Taken to Avoid Further Incidents

The Technical Verification process is designed to provide a means by which changes made to the EOPs are verified to be technically correct. Verification of technical correctness may lead to a modification of the PSTG, with appropriate justification, or a rejection of the EOP change as written. This process provides a functional means to ensure the EOPs accurately and consistently reflect the guidance in PSTG. Sufficient resources and timely efforts will be committed to this process to avoid future inconsistencies between EOPs and PSTG.

3. Date of Full Compliance

Duke Power will be in full compliance by the end of U1EOC5.

DUKE POWER COMPANY

REPLY TO A WEAKNESS (IFI)
50-413,414/89-09-12

Many technical and human factor discrepancies were identified in the EOPs. Each one is listed (Paragraph 3.b and Appendix B).

RESPONSE:

1. Corrective Action Taken and Results Achieved

- A. A formal process for the inclusion or dismissal of the items listed in Appendix B into the EOPs has been planned, but not implemented. Consideration will be given to each item based on the benefit realized to make the procedure more user friendly or technically correct. To ensure those items deemed beneficial are incorporated into the procedure properly and consistently, the actual rewrite of the EOPs will follow the publishing of the revised EP/AP Writer's Guide.
- B. AOPs are currently under revision to upgrade them to the current standard for EOPs. The AOP revision took priority over the EOPs based on the request of licensed operators and the inspection team's recommendation. Complete revision of the AOPs to address the items identified by the inspection team will be accomplished after the publishing of the revised EP/AP Writer's Guide.
- C. Discrepancies between PSTG and EOPs will be resolved in the process of Technical Verification of EOPs during the revision to address inspection team concerns.

2. Corrective Action to be Taken to Avoid Further Incidents

- A. Revising of the EP/AP Writer's Guide will establish a new standard for future EOP/AOP development. The methods for maintaining the standard are already established and well documented by the Verification and Validation (V&V) processes as described in Operations Management Procedures.
- B. AOPs, which were not formally subjected to the V&V process in previous revisions, will be scrutinized under V&V criteria in subsequent revisions.

3. Date of Full Compliance

Duke Power will be in full compliance by the end of U1EOC5.

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REPLY TO A WEAKNESS (IFI)
50-413,414/89-09-13

Many labeling discrepancies between EOPs and panel indication were identified. Each one is listed (paragraph 3.c and Appendix D).

RESPONSE:

1. Corrective Action Taken and Results Achieved

- A. Consideration of the labeling discrepancies noted in Appendix D will be accomplished during the revision of the EP/AP Writer's Guide. Control board/panel labeling is not necessarily the nomenclature by which the operator identifies his indication/controls. Based on training and day to day operation, a functional nomenclature has evolved. Guidance provided to the procedure writer in the EP/AP Writer's Guide must allow enough flexibility so that nomenclature familiar to the operator can be used.
- B. Consideration of the labeling discrepancies will also include proposals to change control board/panel labeling so as to more functionally describe the indication/control items.

2. Corrective Action to be Taken to Avoid Further Incidents

- A. Revising the EP/AP Writer's Guide to establish a standard for referring to indications/and controls and maintaining the standard by the Verification and Validation processes will provide a method of quality control for the EOPs and AOPs.
- B. Control Board/panel nomenclature is a controlled item. To change this nomenclature requires approval of management at various levels based on plant configuration control. This process is considered adequate and will not require modification to make changes, deemed necessary, based on this inspection.

3. Date of Full Compliance

Duke Power will be in full compliance with our commitment to consider the labeling concerns listed in Appendix D by June 1, 1990. Based on the EP/AP Writer's Guide, those concerns involving only a procedure revision will be completed by the end of U1EOC5. For those items of concern requiring Control Board/panel labeling modification, the full compliance date will coincide with the end of the respective unit refueling outage in 1991; 1EOC5 and 2EOC4.

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REPLY TO A WEAKNESS
50-413,414/89-09-14

There is a discrepancy between the EOPs and the S/G pressure meter in the control room (paragraph 3.d and Appendix B item 1.g).

RESPONSE:

1. Corrective Actions Taken and Results Achieved

The marking of the S/G steam pressure gauges has been addressed by origination of work requests 43212OPS and 51172OPS (Unit 2 and Unit 1 respectively). The ranges, which depict abnormal conditions of normal at power operation, have been specified. The corrective action will redesignate the lower red range on each S/G pressure meter starting at 725 psig (Low S/G Steam Pressure SI setpoint) and ending at 0 PSIG on the scale. This work requires removal of the meter from the control board and thus has not been completed with the units at operating temperature and pressure.

2. Corrective Actions to be Taken to Avoid Further Incidents

The red range marking of control panel meters is a functional process and considered an operator aid, when performed correctly. Individual responsibility for this process has been reassigned to better utilize our personnel resources and assure the process functions as intended.

3. Date of Full Compliance

Duke Power will be in full compliance by the end of U1EOC5.

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REPLY TO A WEAKNESS (IFI)
50-413,414/89-09-15

Many writer's guide discrepancies were identified in the EOPs. Each one is listed (paragraph 3.c and appendix C).

RESPONSE:

1. Corrective Action Taken and Results Achieved

- A. A decision has been made to revise the EP/AP Writer's Guide. Based on the comments of the inspection team, it is evident that more detailed guidance should be provided to the EOP and AOP writer.
- B. Many of the discrepancies noted in Appendices B, C and D can only be addressed after decisive guidance is established in the EP/AP Writer's Guide. Thus revisions to the EOPs and AOPs will be made based on the revised EP/AP Writer's Guide and comments deemed appropriate from reports 50-413,414/89-09.

2. Corrective Actions to be Taken to Avoid Further Incidents

- A. The current processes of Verification and Validation (V&V) provide an efficient and adequate means of assuring EOPs conform to written guidance. No corrective action is necessary.
- B. AOPs will be subjected to the V&V processes to assure conformity with written guidance and compatibility with operational experience.

3. Date of Full Compliance

Duke Power will be in full compliance with regard to the EP/AP Writer's Guide by June 1, 1990 and, with regard to the revised EOPs and AOPs, by the end of U1EOC5.

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REPLY TO A WEAKNESS (IFI)
50-413,414/89-09-17

Deficiencies were identified in simulator effectiveness in training on EOPs (paragraph 3.d).

RESPONSE:

1. Corrective Action Taken and Results Achieved

- A. The concurrent use of AOPs is justifiable based on the quantity and control of resources available during a multi-failure scenario. By conscientious decision the Shift Supervisor may use more than one AOP at a time. This is allowed since the AOPs are written to provide various options to stabilize the plant after a particular malfunction. We do not consider this a deficiency.
- B. The EOP/AOP filing methods will be reviewed to determine whether an identification and retrieval problem exists for Control Room personnel. The deficiency noted was based on the observation of a staff person's performance. Appropriate corrective action will be taken, if required.
- C. Entry conditions for EOP/AOPs will be reviewed in conjunction with the review of procedures for other deficiencies noted in this report. The EOP/AOPs will be revised as deemed necessary.

2. Corrective Actions to be Taken to Avoid Further Incidents

- A. Discrepancies discussed in Item 1, with exception of l.c., are not expected to recur. Thus surveillance programs, to monitor for the repetition of the discrepancy, are not required.
- B. The EP/AP Writer's Guide and the Verification and Validation processes will ensure that future revisions to EOP/AOP entry conditions are written to an established standard.

3. Date of Full Compliance:

Duke Power will be in full compliance for the following corrective actions as listed:

- . EOP/AOP filing method review - January 2, 1990
- . EOP/AOP entry condition review - U1EOC5 and U2EOC4