

Duke Power Company  
Nuclear Production Dept.  
P.O. Box 1907  
Charlotte, N.C. 28201-1907

M.S. TUCKMAN  
Vice President  
Nuclear Operations  
(704)373-3851



**DUKE POWER**

February 28, 1991

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, 414/90-32  
Violation 413, 414/90-32-01  
Reply to a Notice of Violation

Gentlemen:

Enclosed is the response to the Notice of Violation issued January 29, 1991 by Alan R. Herdt concerning failure to review procedures incorporated into the Performance Manual.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'M. S. Tuckman'.

M. S. Tuckman

WRC/220/lcs

xc: Mr. Stewart D. Ebner  
Regional Administrator, Region II  
U. S. Nuclear Regulatory Commission  
101 Marietta St., NW., Suite 2900  
Atlanta, Georgia 30323

Mr. W. T. Orders  
NRC Resident Inspector  
Catawba Nuclear Station

9103080145 910228  
PDR ADCK 05000413  
Q PDR

IE01  
11

DUKE POWER COMPANY  
REPLY TO NOTICE OF VIOLATION  
413, 414/90-32-01

Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained covering the activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978 including administrative procedures, test procedures and material control procedures.

Technical Specification 6.8.2 requires that each procedure required by Specification 6.8.1, and changes thereto, be reviewed and approved prior to implementation and periodically reviewed as set forth in administrative procedures.

Station Directive 4.2.1, Development, Approval and Use of Station Procedures, requires in Section 14.0, Periodic Review of Procedures, that comprehensive periodic reviews of all station procedures be performed, at intervals not to exceed 2 years for safety-related and not to exceed 5 years for non-safety related procedures.

Contrary to the above, the procedures incorporated in the Catawba Performance Section Manual, a document which embodies virtually all of the administrative procedures pertaining to the operation of the Performance Department, were not being reviewed on a periodic basis as required by Station Directive 4.2.1. This is considered a Violation of both Technical Specifications 6.8.1 and 6.8.2, and is applicable to both units.

RESPONSE:

1. Reasons for Violation

Performance personnel misinterpreted the classification of the procedures in the Catawba Performance Section Manual as "guidelines" and therefore considered them not to be subjected to the review requirements of Station Directive 4.2.1.

2. Corrective Actions Taken and Results Achieved

A January 17, 1991 Intrastation letter was sent to Performance Supervisors requesting they perform a review of specified procedures in the Performance Manual.

3. Corrective Actions to be Taken to Avoid Further Violations

Station Directive 4.2.1 is being revised to ensure that all safety-related Station Directives and those parts of section manuals which address Safety Related Functions require a maximum review period of two years. Non-safety related Documents will have a maximum review period of five years.

Station Directive 4.2.1 will be approved by 4/1/91. All Station Directives and Section Manuals will be reviewed and in compliance with this requirement by 12/1/91.

Performance personnel will review the Performance Section Manual and make revisions as required. The review and necessary revisions will be completed by 6/30/91.

Performance will add all Performance Section Manual Directives to the Performance Section's two year review procedure (PT/O/A/4000/01) to ensure that the two year review is completed as required by Station Directive 4.2.1. This change will be completed by 6/30/91.

4. Date of Full Compliance

Duke Power will be in full compliance by 12/1/91.