

ENCLOSURE 1

NOTICE OF VIOLATION

Duke Power Company
Catawba Unit 2

Docket No. 50-414
License No. NPF-52

During an NRC inspection conducted on May 8, 1994 - June 11, 1994, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Technical Specification 6.8.1, Procedures and Programs, requires, in part, that written procedures be established, implemented and maintained covering the activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, which includes licensee procedures controlling operation and maintenance of safety-related systems.

Operations Procedure OP/2/A/6150/06, Draining the Reactor Coolant System (RCS), Enclosure 4.1, Initial Draining of the NC System, requires that the RCS (via the Pressurizer Relief Tank) be vented to the Containment Auxiliary Carbon Filter Units for radioactive gas cleanup and be depressurized prior to opening an unfiltered pressurizer vent path directly to containment via valve 2NC-300.

Maintenance Procedure MP/0/A/7600/103, Fisher/Posi-Seal Butterfly Valve Disassembly and Reassembly, Sections 11.1 and 11.7, includes instructions for the removal and reinstallation of the actuator for valve 2RN-C04.

Instrument Procedure IP/0/A/3230/07, Procedure for Movable Incore Detector Thimble Retraction and Insertion, Section 10.3.7.D, requires installation of an O-ring in the incore detector thimble low pressure seal.

Operations Procedure OP/2/A/6350/02M, Drain and Fill of the Diesel Generator Cooling Water System, Enclosure 4.1, Draining and Filling the 2A KD System, outlines the steps necessary for draining the 2A Diesel Generator KD System. Steps 2.3 and 2.4 of this enclosure require the KD keepwarm pump and heaters to be electrically isolated prior to draining the system.

Contrary to the above requirements:

- A. On May 6, 1994, a non-licensed operator failed to properly implement OP/2/A/6150/06, Enclosure 4.1, by failing to verify that the Reactor Coolant System was depressurized (via Pressurizer Relief Tank pressure indication in the Control Room) prior to opening valve 2NC-300. Since the Pressurizer Relief Tank was slightly pressurized, this caused the release of unfiltered radioactive gas from the Reactor Coolant System into containment, resulting in an automatic Containment Purge Supply and Exhaust System isolation and containment evacuation alarm.

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- B. On May 9, 1994, maintenance personnel failed to implement an existing procedure which was applicable to the activity. MF/O/A/7600/103, Fisher/Posi-Seal Butterfly Valve Disassembly and Reassembly, Sections 11.1 and 11.7, were not utilized for the removal and reinstallation of the actuator on valve 2RN-C04, resulting in improper installation of the actuator.
- C. On May 9, 1994, maintenance personnel failed to properly implement procedure IP/O/A/3230/07, Procedure for Movable Incore Detector Thimble Retraction and Insertion. The procedure specified that O-rings be used for the low pressure seals. Split rings were improperly installed, resulting in leakage of the seals upon initial fill of the refueling cavity.
- D. On May 11, 1994, maintenance personnel failed to implement OP/2/A/6350/02M, Enclosure 4.1, for draining the 2A Diesel Generator KD System resulting in the KD keepwarm pump and heaters remaining energized and in operation after the system was drained. The continued operation of these components was potentially damaging to them.
- E. On May 13, 1994, operations personnel failed to establish an adequate procedure for draining the Cold Leg Accumulators to the liquid waste system. Detailed instructions included in the Operations Work List were utilized as procedure steps which resulted in improper sequencing of the evolution, rapid filling of the Reactor Coolant Drain Tank, and the overflow of a small quantity of water to the containment floor. Increased radiation levels resulted in an automatic Containment Purge Supply and Exhaust System isolation and containment evacuation alarm.

This is a Severity Level IV Violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Duke Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or demand for information may be issued so as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Atlanta, Georgia
this 8th day of July 1994