

**DUKE POWER COMPANY**

P.O. BOX 33189

CHARLOTTE, N.C. 28242

HAL B. TUCKER  
VICE PRESIDENT  
NUCLEAR PRODUCTION

TELEPHONE  
(704) 373-4531

February 17, 1984

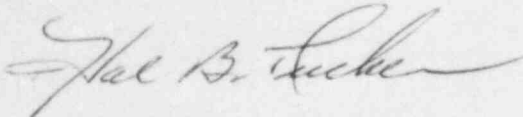
Mr. James P. O'Reilly, Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30303

Re: RII:NE  
50-413/83-50  
50-414/83-38

Dear Mr. O'Reilly:

Please find attached a response to Violation No. 50-413/83-50-01 as identified in the above referenced inspection report. Duke Power Company does not consider any information contained in this inspection report to be proprietary.

Very truly yours,



Hal B. Tucker

LTP/php

Attachment

cc: NRC Resident Inspector  
Catawba Nuclear Station

Mr. Robert Guild, Esq.  
Attorney-at-Law  
P. O. Box 12097  
Charleston, South Carolina 29412

Palmetto Alliance  
2135½ Devine Street  
Columbia, South Carolina 29205

8405300466 840502  
PDR ADOCK 05000413  
Q PDR

Duke Power Company  
Catawba Nuclear Station  
Response to Violation 50-413/83-50-01

Violation:

10 CFR 50, Appendix B, Criterion V as implemented by Duke Power Company QA Topical Report, Duke-1-A, Section 17.2.5 requires that documented instructions, procedures, or drawings include appropriate quantitative acceptance criteria for determining that important activities had been satisfactorily accomplished. Instrument calibration procedure IP/O/A/3600/02 is used for calibrating diesel generator fuel oil day tank level switches and provides assurance that minimum fuel oil quantity is available for use.

Contrary to the above, instrument calibration procedure IP/O/A/3600/02 dated January 31, 1983, was found to be inadequate in that it did not take into consideration the unusable amount of fuel oil in the bottom of the tank which must be compensated for when calibrating level setpoint. This error would have allowed the amount of fuel oil to be less than required for operations.

This violation is applicable to Unit 1 only.

Response:

- (1) We deny the portion of the NRC's stated violation pertaining to operations, but admit it is possible for the day tank to contain less than a one-hour supply without alerting the operators. The calculation which determined the setpoints for these switches was based on a commitment made to the NRC to maintain at least a one-hour supply of fuel in the day tank. It was intended that the low-low level alarm be calibrated to alert the operators that this limit was being approached. Design Engineering's calculation took credit for an unusable tank volume calculated to be 13.25 gallons which would supply the diesel for less than 100 seconds. Thus, at low-low level, the tank would have provided 58 minutes and 20 seconds' worth of fuel. This design feature would not have resulted in the amount of available fuel to be less than required for adequate operations.

It should also be noted that the level in this tank is maintained in an operating band which is at least 2 inches higher (i.e., 15.34 gallons minimum) than the low-low level setpoint.

- (2) This error resulted from an incomplete review of the tank design details.
- (3) The Design Engineering calculation has been revised and no longer takes credit for the unusable volume.
- (4) Other tank calculations were checked to determine if similar errors had been made and none was found. Therefore, we feel this is an isolated occurrence and further corrective action is not necessary.
- (5) The revised setpoint calculation for the Diesel Generator Fuel Oil Day Tank has been completed and appropriate information has been transmitted to the station. No further action is deemed necessary.