

DUKE POWER COMPANY

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VICE PRESIDENT
NUCLEAR PRODUCTION

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January 27, 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. 50-413/83-50-02 as identified in the above referenced inspection report. Due to schedular problems a response to Violation No. 50-413/83-50-01 is still being finalized but will be provided by February 17, 1984. Duke Power Company does not consider any information contained in this inspection report to be proprietary.

Very truly yours,

Hal B Tucker
HTB

Hal B. Tucker

LTP/php

Attachment

cc: NRC Resident Inspector
Catawba Nuclear Station

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CATAWBA NUCLEAR STATION

Violation:

10 CFE 50, Appendix B, Criterion V as implemented by Duke Power Company Topical Report "Duke-1-A" Section 17.2.5, require activities affecting quality be accomplished in accordance with procedures.

Contrary to the above, activities affecting quality were not accomplished in accordance with procedures in that, Station Directive, 4.4.3, Temporary Station Modifications, requires that when a temporary modification is performed, documentation of this modification be provided which identifies the reason for this change, effects on system operation, independent verification of the installation, and approval of the modification by designated personnel. A temporary modification was performed on pressurizer heater fuses on or about November 26, 1983, and the requirements of this procedure were not adhered to.

Response:

1. Duke denies the violation as stated.
2. Duke Power's interpretation of "Activities Affecting Quality" in 10CFR50, Appendix B, Criterion V are activities concerning safety-related systems. The pressurizer heater system is non-safety-related. Furthermore, the fuses referenced in the violation are not pressurizer heater fuses. The fuses modified (1-2 amps) supply power to fans which cool the Silicon Control Rectifier Cabinets, through which power is supplied, through pressurizer heater fuses (500 amps), to the heater bundles.
3. The following is a summary of events pertaining to why Station Directive 4.4.3 was not strictly adhered to:

The initial troubleshooting was performed the night of November 25, 1983, under Work Request 1224 Prf. The technicians and Relief Supervisor involved determined that the One (1) amp fuses in the fan power circuit were undersized and replaced them with Two (2) amp fuses and attached a note to the Work Request for the next shift to complete the necessary paper work to complete the Modification. Due to the priority work going on and Relief Supervision in place of the IAE Shift Supervisors, the Work Request and note were not noticed until November 28. Further review was conducted on November 29 and Work Request 1353 IAE was issued on November 30 to make the 2 amp fuses a Temporary Modification until drawing CNM-1399.08-08 could be revised to reflect the 2 amp fuses as being the permanent fuses.

The pressurizer heaters have several safety features in the power and control circuits including the pressurizer heater fuses (500 Amp), temperature switches on the SCRs which will trip the control circuits, and flow switches on the fans which cool the SCRs, which will also trip the control circuits. None of these safety features were degraded due to putting the 2 amp fuses in place of the 1 amp fuses.

Station Directive 4.4.3 was not strictly adhered to in this instance. It was IAE's interpretation that the 2 amp fuses could be left in under troubleshooting and would have to be removed or made permanent prior to the Work Request being approved and closed out, which was done. Under Section 4.2 of the Directive, subsection 4.2.1.5 allows changes made under a Work Request in progress, which do not affect another operating system, to remain in place but must be removed prior to the Work Request being signed off by the accepting operational control.

To Summarize, IAE did not fully comply with Station Directive 4.4.3 and will receive further instruction on it, but this instance did not involve "Activities Affecting Quality" and did not degrade any safety features of the pressurizer heater system.

4. IAE personnel have received further instructions on Station Directive 4.4.3, Temporary Station Modifications.
5. Duke is in full compliance with the referenced document sections.