

DUKE POWER COMPANY

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HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

May 31, 1984

5 P12:34

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:SPB
50-413/84-35

Dear Mr. O'Reilly:

Please find attached a response to Violation No. 413/84-35-01, as identified in the above referenced Inspection Report. We apologize for the lateness of this response. We revised the response after it had initially been prepared, and concurrence of the groups involved further added to its delay. Duke Power Company does not consider any information contained in this inspection report to be proprietary.

Very truly yours,

Hal B. Tucker

Hal B. Tucker

LTP/php

Attachment

cc: NRC Resident Inspector
Catawba Nuclear Station

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Catawba Nuclear Station
Response to Violation No. 50-413/84-35-01

Violation:

10 CFR 50, Appendix B, Criterion V, as implemented by Topical Report Duke 1A (Rev. 6), Section 17, paragraph 17.2.5 and Administrative Policy Manual for Nuclear Stations, Sections 3.3, 4.1, and 4.7 require that activities affecting quality shall be accomplished in accordance with instructions, procedures or drawings.

Contrary to the above, between June 1983 and March 1984 activities affecting quality were not accomplished in accordance with the following procedural controls:

- (A) Station Directive 3.3.7, "Catawba Nuclear Station Work Request Preparation," Section 5.0
- (B) Station Directive 3.3.2, "Control of Maintenance Program," Section 2.0
- (C) "Catawba Nuclear Station Maintenance Procedure 1.0," Sections 2.0 and 4.0

These administrative controls were violated in that:

- (1) D/G control panel components identified as QA1, Nuclear Safety-Related were removed, repaired and reinstalled without an approved nuclear station work request on March 21, 1984.
- (2) QA/QC personnel were not involved in the evaluation identified in item (1) as required by established procedures.
- (3) Proper staff approval was not obtained prior to commencing required support under a manpower support nuclear station work request (NSWR #0236 PRF).

Response:

- (1) 1. Duke admits this part of the violation.
- 2. The reason for the violation was that the Instrument and Electrical (I&E) Technician and Supervisor did not obtain another work request for troubleshooting the valve, because the valve was not repaired or replaced but only cleaned and returned to service.
- 3. Corrective Action Taken:
 - (a) Subject valve was replaced under maintenance work request 1811 PRP.
 - (b) I&E Technicians and Supervisors have been instructed that no maintenance or troubleshooting can take place under a "support" work request.
- 4. Corrective Action outlined in (3) above should prevent recurrence.
- 5. Compliance has been achieved.

Response (cont'd)

- (2) 1. Duke admits this part of the violation.
2. The reason for the violation occurring was because of the improper use of the work request system as outlined in Part 1 of this response.

Had the technicians communicated properly with QA/QC personnel on the actual type of work being performed, then the appropriate inspections would have been conducted.

3. The work in question was reaccomplished under NSW 1811 PRF and had appropriate QA/QC personnel involvement.
4. The corrective action taken in Part 1 of this response should prevent occurrence.
5. Compliance has been achieved.
- (3) 1. Duke admits this part of the violation.

2. Station Directive 3.3.7 requires section head, superintendent or station manager approval for "Manpower Support" work requests. This is an administrative control to restrict commitment of manpower resources. The station directive is not clear in specifying the types of manpower support which can be authorized at various organizational levels.
3. Station Directive 3.3.7 will be reviewed and revised so that "Manpower Support" will be more clearly defined.
4. The revising of Station Directive 3.3.7 should prevent recurrence.
5. Station Directive 3.3.7 will be revised by June 29, 1984.