

Duke Power Company
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DUKE POWER

June 1, 1992

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Catawba Nuclear Station
Docket Nos. 50-413 and 50-414
Reply to a Notice of Violation
NRC Inspection Report 50-413/22-09 and 50-414/92-09

Attached is Duke Power's response to the two (2) Level IV violations cited in the Notice of Violation by subject Inspection Report dated May 4, 1992.

The two (2) violations involved lack of procedural compliance which had the potential to lead to personnel overexposure and the spread of contamination, as well as inadequate communication and inattention to detail leading to a system alignment deficiency in the Nuclear Service Water System.

Very truly yours,

A handwritten signature in cursive script that reads "M.S. Tuckman".

M.S. Tuckman

Attachments

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9206110070 920601
PDR ADDCK 05000413
Q PDR

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Handwritten initials "JED" in a large, bold, slanted font, with a vertical line to the right.

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xc: S.D. Ebnetter
Regional Administrator, Region II

R.E. Martin, ONRR

W.T. Orders
Senior Resident Inspector

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bxc: R.L. Gill
R.O. Sharpe
M.E. Patrick
A.V. Carr
NCMPA-1
NCEMC
SREC
PMPA
Group File: CN-815.01 (92-09)
Document Control: 815.01

DUKE POWER COMPANY
REPLY TO A NOTICE OF VIOLATION
413,414/92-09-01

3. On April 1, 1992, during the performance of PT/O/A/4400/01I and PT/O/A/4400/01M, Safety personnel failed to weigh the fire extinguisher in Room 217 of the Auxiliary Building even though a marker was used to initial and date the inspection tag.

This is a Severity Level IV violation.

RESPONSE:

1. Reason For Violation

Both Safety technicians failed to proceed to the nearest whole body monitor upon exiting a RCZ due to inadequate proficiency/lack of attention to detail regarding Station Directive 3.8.3 (Contamination Prevention, Control, and Decontamination Responsibilities). Also, while one of the Safety technicians was performing a hand frisk of hand-held equipment utilized inside the RCZ, he was distracted by an alarm on a nearby whole body monitor. This contributed to unintentionally performing an inadequate frisk of the hand held items.

The Standing Radiation Work Permit (SRWP) was not read as required because the Safety technician, planning to enter the RCZ, assumed that the dress requirements were the same as the previous month's inspection. The other Safety technician, not planning to enter the RCZ, assumed that his peer had properly read and understood the SRWP.

Both Safety technicians were not conscientious to following procedures regarding the proper wrapping and bagging of potentially contaminated equipment, upon exiting the RCZ (Station Directive 3.8.8, Radiological Work Practices, Section 4.2.2).

The fire extinguisher in Room 217 was not weighed per PT/O/A/4400/01I (Annual Maintenance and Inspection of Portable Fire Extinguishers) because the Safety technician performing the inspection perceived that weighing the extinguisher could cause an airborne contamination problem. Plans were to weigh the fire extinguisher following a discussion with Radiation Protection personnel regarding the potential for airborne contamination.

DUKE POWER COMPANY
REPLY TO A NOTICE OF VIOLATION
413,414/92-09-01

Technical Specification 6.8.1 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, including:

Station Directive (SD) 3.8.3, Contamination Prevention, Control, and Decontamination Responsibilities, Section 4.4, requires personnel exiting contaminated Radiation Control Zones (RCZ) perform hand and foot contamination check with a hand held frisker prior to leaving the local area and then proceed to the contaminated side of the change room to perform a whole body survey.

Station Directive 3.8.8, Radiological Work Practices, Section 2.1.3, requires all employees to be responsible for reading and complying with posted Standing Radiation Work Permits (SRWP). In addition, Section 4.4.2, instructs personnel who have been in a contaminated RCZ to wipe materials upon exiting to prevent the spread of contamination.

Procedures PT/O/A/4400/01I, Annual Maintenance and Inspection of Portable Fire Extinguishers, and PT/O/A/4400/01M, Monthly Visual inspection of Fire Hose Stations, require, in the Limits and Precautions sections, that plant fire extinguishers be weighed to ensure their reliable performance.

Contrary to the above:

1. On April 1, 1992, two Safety personnel failed to perform a hand and foot frisk or whole body survey upon exiting a contaminated RCZ. This contributed to one of the individuals exiting the Radiation Control Area with an undetected hot particle on his skin resulting in a calculated overexposure of 29.9 Rem.
2. On April 1, 1992, two Safety personnel entered a contaminated RCZ without reading or complying with the associated SRWP and upon exiting the RCZ, failed to properly bag material being removed. This had the potential to contribute to the spread of contamination.

DUKE POWER COMPANY
REPLY TO A NOTICE OF VIOLATION
413,414/95-09-01

2. Corrective Actions Taken and Results Achieved

On April 8, 1992, and May 13, 1992, both Safety technicians completed additional General Employee Training (Unescorted Access) on radiation protection to enhance their awareness of radiological work practices.

On April 2, 1992, all Safety Department personnel received training on Station Directives 3.3.3 (Contamination Prevention, Control, and Decontamination Responsibilities), 3.8.8 (Radiological Work Practices), and participated in a group discussion regarding proper procedural adherence.

On April 3, 1992, the subject fire extinguisher in Room 217 which was not initially weighed per PT/O/A/4400/01I on April 1, 1992, was found to be contaminated by Radiation Protection personnel and was decontaminated. On April 6, 1992, this extinguisher was weighed per PT/O/A/4400/01I and was verified to meet the acceptance criteria as specified by the procedure.

On May 20, 1992, a small article monitor (SAM) was placed in service at the Materials Access Point (MAP) which will automatically monitor hand held items for contamination prior to exit.

3. Corrective Actions to be Taken to Avoid Further Violations

The Safety Group is scheduled to receive annual crew demonstration on radiation protection practices utilizing a mock-up which reflects actual plant conditions. Scheduled training dates are June 16 and June 23, 1992.

Additional emphasis on contamination issues will be provided to station personnel during annual radiation protection training. The initial completion of this training for all station personnel is scheduled to be completed by November 1, 1993.

4. Date of Full Compliance

Duke Power will be in full compliance on June 23, 1992.

DUKE POWER COMPANY
REPLY TO A NOTICE OF VIOLATION
413/414, 92-09-03

Technical Specification 6.8.1 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, including:

Operations Management Procedure (OMP) 2-18, Tagout Removal and Restoration (R&R) Procedure, Section 3.2, requires that the R&R record sheets shall be used by operations personnel to provide information to be used to ensure plant conditions are maintained as necessary to safely perform work.

Operations Management Procedure (OMP) 1-8, Authority and Responsibilities of Licensed Reactor Operators and Licensed Senior Reactor Operators, requires that the Control Room SRO keep himself and his staff informed of all evolutions that may affect the operation of the plant.

Contrary to the above:

1. On March 17, 1992, R&R 02-556, the block tagout for controlling maintenance activities on the Nuclear Service Water (RN) System, was inadequate in that it failed to provide steps or cautions to ensure proper RN valve alignments were performed. This resulted in the operation of the 2A RN Pump without adequate minimum flow protection.
2. On March 17, 1992, the Control Room SRO failed to follow OMP 1-8, in that he did not adequately inform his staff of the necessary plant alignment to support a plant evolution involving the RN System that led to the 2A RN Pump not having adequate minimum flow protection.

DUKE POWER COMPANY
REPLY TO A NOTICE OF VIOLATION
413/414, 92-09-03

RESPONSE:

1. Reason For Violation

This incident is attributable to Management Deficiency.

One Management Deficiency existed due to the lack of a task specific document. During this evolution, three separate work documents were used to perform this task.

Two other Management Deficiencies existed due to less than adequate verbal instructions and insufficient supervision.

The Shift Supervisor did not communicate the complete work package with all shift personnel, therefore, the information available to the shift was in several fragments. Also, the Control Room SRO and Shift Supervisor were occupied with a large number of TSAIL (Technical Specification Action Item Log) entries required for this evolution, therefore, they were not available to the control room staff to assist in the work activity.

2. Corrective Actions Taken and Results Achieved

Operations Management issued a communication package directing shift management to include all shift personnel in job briefings for major work activities. Also, Operations Management spoke with each shift concerning this incident to reinforce management's expectations for thorough communications and the role/responsibilities of the Control Room SRO. The communication package and shift briefings were completed April 28, 1992.

Since the communication packages have been put in place and the shift briefings have been held, no additional problems with this type of evolution have been noted.

DUKE POWER COMPANY
REPLY TO A NOTICE OF VIOLATION
413/414, 92-09-03

3. Corrective Actions to be Taken to Avoid Further Violations

- a) Operations will revise OP/0/A/6400/06C to incorporate the required equipment isolation/alignments necessary for this activity by August 1, 1992.
- b) Effective June 1, 1992, it will be standard practice to develop tailgate packages for major work activities that outline the scope of work, required procedure alignments, affected Technical Specifications and other special precautions needed.

4. Date of Full Compliance

Duke Power will be in full compliance August 1, 1992.