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84 JUN 14 A10:07

June 8, 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: GAB/LEF/CFS
50-413/84-18

Dear Mr. O'Reilly:

Please find attached responses to Violation Nos. 413/84-18-01, 413/84-18-02, and 413/84-18-03 as identified in the above referenced inspection report. My letter of May 23, 1984 transmitted our response to Violation No. 413/84-18-04. Although it was not stated definitely in the response, we wish to make clear that Duke Power denies this violation. Please find attached a revised response to this violation. Duke Power Company does not consider any information contained in this inspection report to be proprietary.

Very truly yours,

H. B. Tucker

Hal B. Tucker

LTP/php

Attachment

cc: NRC Resident Inspector
Catawba Nuclear Station

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RESPONSE TO NRC
INSPECTION REPORT

The following comments and exceptions are in response to violations reported in NRC Report No.'s. 50-413/84-18 and 50-414/84-12.

Violation 1 (413/84-18-02)

"Measures had not been established to assure adequate control of packaging, storage, and handling activities. Lack of procedures and instructions resulted in improper packaging and storage of 11 printed circuit boards and storage of several different items in the same shelves. Storage of items in a random fashion, without proper planning and instructions, could result in physical damage, distortion, and improper handling of delicate or precision machine parts."

References:

(a) ANSI/ASME N45.2.2-1978

(b) Material Handling Procedure 5.1 (Rev. 6)

(c) Administrative Policy Manual for Nuclear Stations

(d) Material Handling Procedure 2.1 (Rev. 3)

(e) Material Handling Procedure 3.1 (Rev. 3)

Response:

Duke denies the violation. Reference (a) Sections 2.1 and 2.2, requires planning to take into account the need for procedures, and instructions shall be generated, used, and maintained in accordance with this standard. The Catawba Nuclear Station Materials Manual has been developed, containing appropriate procedures and instructions, and implemented, to assure adequate control of receiving, storage and handling of materials, parts, and components.

The eleven (11) printed circuit boards cited were staged in the QA Hold Area, along with several other items, after being returned by an I&E Technician. The requirements of reference (b) Section 6.0, stipulates that unused materials should be returned to the QA Hold Area for reinspection by QA. The QA Hold Area is, by our interpretation, used for receipt and inspection in accordance with reference (c) Section 2.4.5, and reference (d), and should not be construed as final storage, identified under reference (c) Section 2.4.7.

Equipment, components, and parts are stored in specific locations based on size, delicacy, configuration, ease of access, and many other factors based on experience with same and equal items, good materials practices, and in accordance with reference (c) Section 2.4.7 and reference (e).

Comments:

Our Materials personnel are instructed to prevent damage to all equipment, not just that sensitive to environmental conditions, effects of acceleration forces (dropping, banging, throwing), physical damage, etc. We do agree that circuit boards and other electronic components should not be stored in plastic bags without protective packaging, and do not subscribe to that practice. However, items in a staging area, awaiting receipt, inspection, and processing, should not be construed as "in storage". Our Materials personnel have been instructed to exercise more care and better judgment in staging items for both QA and Non-QA receipt inspections.

Violation 2: (413/84-18-01)

"Paragraph 4.2 of Catawba Material Handling procedure (MHP) 6.2, Repaired/ Salvaged Items, Revision 1, the responsible supervisor had not placed a yellow non-serviceable tag on a Brooks Rotometer and three valves which had been removed from service and returned to the storeroom for repair. Also, these items had not been stored in an appropriate segregated area."

References:

(a) ANSI/ASME N45.2.2 1978 Duke Power Company Material Handling Procedure 6.2

Explanation of Violation 2

1. Duke agrees with the violation.

2. The Shop Supervisor failed to tag items before returning them to storeroom. Reference (a) was not followed by the Shop Supervisor or Materials personnel.

3. Materials personnel have been instructed on reference (a) and the items described in Violation 2 have been properly tagged and segregated.

4. Measures have been taken to instruct all Materials personnel on reference (a) to ensure this procedure is adhered to in the future.

5. This action item will be fully implemented by June 1, 1984.

Violation 3.a: (413/84-18-03)

"The licensee's preventive maintenance programs do not include all safety related structures, systems and components turned over for operational control."

References:

(a) Appendix A to Regulatory Guide 1.33, paragraph 9.b, states, "preventive maintenance schedules should be developed to specify lubrication schedules, inspections of equipment, replacement of such items as filters and strainers, and inspection or replacement of parts that have a specific lifetime such as wear rings."

(b) ANSI N18.7-1976/ANS 3.2, Section 5.2.7.1, fourth paragraph, states "a preventive maintenance program including procedures as appropriate for safety-related structures, systems and components shall be established and maintained which prescribes the frequency and type of maintenance to be performed. A preliminary program based on service conditions and experience with comparable equipment should be developed prior to fuel loading. The program should be revised and updated as experience is gained with the equipment."

Exception to Violation 3.a:

Duke denies this part of the violation. We can neither find nor interpret anything in references (a) or (b) that states or implies a requirement for all safety related structures, systems and components to be placed and maintained in a preventive maintenance program. Reference (b) does state that a preliminary program should be developed, prior to fuel load, based on existing service conditions and experience with comparable equipment.

Our interpretation of references (a) and (b) is; a preliminary preventive maintenance program has been developed and implemented based on manufacturers recommendations, good maintenance practices, and service conditions. Those items of equipment, either safety related or non-safety related, that meet the criteria of Section 3.3 of our Administrative Policy manual for Nuclear Stations, requirements for establishing a Preventive Maintenance Program, Section 5.2.7.1 fourth paragraph of ANSI N18.7-1976/ANS 3.2, Catawba Nuclear Station Directive 3.3.3 and Maintenance Management Procedure 3.0, revision 9, are continually being evaluated by Catawba Nuclear Station for the Station Preventive Maintenance Program. Equipment and components are added and removed in an orderly manner by reviewing, analyzing, and evaluating service conditions, repair history, and past experience consistent with good maintenance practices.

Violation 3.b:

"The Station Lubrication Program is not being implemented relative to the Safety Injection System (NI). This system was turned over for operational control on August 27, 1982. Lubrication is required for the Safety Injection Pump motors semi-annually, pumps annually, and pump motor couplings semi-annually. Maintenance was performed January 27 and February 8, 1983. Additional maintenance has not been performed as of the date of this inspection. This example is not intended to be all inclusive."

References:

(a) Catawba Nuclear Station Directive 3.3.6 Revision 1, Section 2.2. Normal plant operation requires equipment to be inspected for proper lubrication at intervals necessary to reduce premature wear and system failure.

(b) Catawba Maintenance Management Procedure 3.2 Section 2.0 states: This procedure applies to lubricating station equipment identified by Station Directive 3.3.6. Equipment that is in operation or run on a regular frequency, is lubricated either under this procedure or the Station PM Program. Manufacturer's manuals are the basic references for type and frequency of lubrication. The Station Lubrication manual contains guidelines for lubricating equipment.

(c) Work Requests 0038020PS, 0039270PS

(d) Work Requests 000929PRF, 000609MNT, 0080000PS.

Exception to Violation 3.b:

Duke denies this part of the violation. The Safety Injection System was turned over to Nuclear Production from Construction in two (2) parts. Part 1 on August 27, 1982 (as noted in the violation) and Part 2 on January 24, 1983 as "provisional" turnovers. Both of these turnover packages had a total of sixty-seven (67) electrical and mechanical exceptions. Exception number six (6) dated November 24, 1982 stated that final alignment of the Safety Injection (SI) pumps had not been done, but would be completed at a later date. Based on this exception, Nuclear Production Operations took "operational" control of the Pumps as follows; PUA on January 28, 1983 and PUB on February 8, 1983, not on August 27, 1982 as stated in the violation. On February 9, 1983 our performance section recorded baseline data on the two pumps.

In accordance with references (a), (b), and (c), plant equipment that is in operation, or run on a regular frequency, should be lubricated. This equipment was neither operated nor run often enough to require lubrication. Over lubrication has been demonstrated, utilizing past experience, to be more detrimental than under lubrication. Additionally, service conditions based on run time and use did not warrant lubrication.

In accordance with reference (d), maintenance had been performed on these pumps, motors, couplings. On August 31, 1983 and November 10, 1983 PUA had maintenance performed. On January 19, 1984 PUB also had maintenance performed on it.

Revised Response to Violation 413/84-18-04

1. Duke Power Company denies the Violation.

2. Justification for Denial

   (as stated in Part A and B of original response)

3. We are in full compliance.