

Yellow

JUL 18 1984

Duke Power Company  
ATTN: Mr. H. B. Tucker, Vice President  
Nuclear Production Department  
422 South Church Street  
Charlotte, NC 28242

Gentlemen:

SUBJECT: REPORT NOS. 50-413/84-18 AND 50-414/84-12

This refers to your responses of May 23 and June 8, 1984, to our Notice of Violation issued on April 19, 1984, concerning activities conducted under NRC Construction Permit Nos. CPPR-116 and CPPR-117.

We examined your responses to Violations 2 and 5 and conclude that they meet the requirements of 10 CFR 2.201. We will examine the implementation of your corrective actions during future inspections.

Your response denied Violations 1 and 3. We have reviewed these responses and concluded for the reasons presented in the enclosure to this letter that the violation occurred as stated in the Notice of Violation. Therefore, in accordance with the requirements of 10 CFR 2.201, and within 20 days of the date of this letter, please resubmit your responses to these Violations.

Your response also denied Violation 4. Based upon the clarification provided in your May 23, 1984, response and in a telephone discussion between Duke Corporate personnel and NRC Region II personnel on June 25, 1984, we agree with your denial. NRC Region II records have been revised to reflect withdrawal of this violation.

Should you have any questions concerning this letter, we would be happy to meet with you and discuss the matter further.

Sincerely,

ORIGINAL SIGNED BY  
ROBERT D. MARTIN *[Signature]*

James P. O'Reilly  
Regional Administrator

Enclosure:  
Staff Evaluation of  
Licensee Responses

cc w/encl:  
R. L. Dick, Vice President - Construction  
J. W. Hampton, Station Manager

bcc: (See page 2)

8409240116 840831  
PDR ADDCK 05000413  
PDR

bcc w/encl:  
NRC Resident Inspector  
G. Johnson, ELD  
Document Control Desk  
State of North Carolina  
J. Milhoan, IE

RII <i>[Signature]</i> GABelisle:ht 7/5/84	RII <i>[Signature]</i> CMUpright 7/5/84	RII <i>[Signature]</i> AFGibson 7/3/84	RII <i>[Signature]</i> JAOlshinski 7/3/84	RII <i>[Signature]</i> JMPuckett 7/3/84	RII <i>[Signature]</i> HCDance 7/3/84	RII <i>[Signature]</i> RCLewis 7/3/84
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ENCLOSURE

STAFF EVALUATION OF LICENSEE RESPONSES  
DATED MAY 23 AND JUNE 8, 1984

A. Denial of Violation 1

You make the following statements in your denial:

"The Catawba Nuclear Station Materials Manual has been developed...and is being implemented to ensure adequate control of...and components."

"The eleven (11) printed circuit boards cited were staged in the QA Hold Area...and should not be construed as final storage, identified under reference (c) Section 2.4.7."

"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 judgement in staging items for both QA and non-QA receipt inspections."

Your QA program (references b, c, d, and e of your denial letter) must provide measures to assure that proper packaging, handling, and storage practices are developed and implemented to protect items from environmental or physical damage. These practices (procedures) must be developed and implemented as specified in paragraphs 2.1 and 2.2 of ANSI N45.2.2-1978. Paragraph 1.2 of ANSI N45.2.2-1978 assigns responsibility to any individual or organization that participates in packaging, shipping, receiving, storage, and handling of items. This paragraph also states that these requirements are intended to assure that the quality of items is not degraded as a result of packaging, shipping, receiving, storage, and handling practices and techniques.

Duke Power Company is responsible for protection of reactor plant equipment as soon as it arrives on site until the item is removed from the site. This includes staging areas, shops, etc., in transit between all areas, not just while the equipment is in "final storage". Inspections by the licensee are also required by ANSI Standards to assure that all items are properly handled and protected during all phases of plant activity. The printed circuit boards were intended to be a typical example and should be considered an indication of a much broader problem.

Since additional information was not provided to assure compliance with regulatory requirements, we consider the failure to provide adequate handling and storage procedures a violation of regulatory requirements.

## B. Denial of Violation 3.a

You make the following statement in your denial:

"We do not interpret references (a) [Appendix A to Regulatory Guide 1.33, paragraph 9.b] or (b) [ANSI N18.7-1976/ANS 3.2, Section 5.2.7.1, fourth paragraph] to imply a requirement for all safety-related structures, systems, and components to be placed and maintained in a preventive maintenance program." (The bracketed references were added by Region II for clarification.) "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."

Reference (b), first paragraph, states that a maintenance program shall be developed to maintain safety-related structures, systems, and components at the quality required for them to perform their intended functions. Reference (b), fourth paragraph, first sentence, states that 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. From these two statements, it is clearly delineated that not only must a program be established, but that a preventive maintenance program must be established for appropriate safety-related structures, systems, and components.

These programs must be fully implemented at NRC license issuance. A self-imposed more conservative requirement is stated in Duke Power Company QA Topical Report, Section 17.2.2, which requires that the Operational Quality Assurance Program be gradually expanded as necessary until full implementation at least ninety (90) days prior to fuel loading. Our evaluation concluded that the preventive maintenance program did not include appropriate safety-related structures, systems, and components that had been provisionally turned over for operational control, as evidenced by this violation. Very few safety-related structures, systems, and components had been evaluated for preventive maintenance even though some systems had been provisionally turned over as much as a year prior to the inspection date.

We conclude that the required preventive maintenance program has not been established.

## C. Denial of Violation 3.b

You make the following statement in your denial:

"In accordance with references (a) [Catawba Nuclear Station Directive 3.3.6, Revision 1], (b) [Catawba Maintenance Management Procedure 3.2], and (c) [Work Requests 003802 OPS, 003927 OPS] plant equipment that is in operation, or runs on a regular frequency, should be lubricated. (The bracketed references were added by Region II for clarification). This equipment was neither operated nor run often enough to require lubrication. Over lubrication has been demonstrated, utilizing past



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experience, to be more detrimental than under lubrication. Additionally, service conditions based on run time and use did not warrant lubrication."

While we agree that over lubrication can be detrimental, information was not presented that an engineering evaluation or other review had been performed to waive lubrication requirements. Reference (c) work request (WR) dates were identified in the Notice of Violation to indicate when the operations group recorded base line data for safety injection pumps A and B. WR 003802 OPS did perform required lubrication on pump A. WR 003927 OPS changed the oil in pump B reservoir, but overall preventive maintenance requirements were not addressed. Water was identified in the pump B oil and a sample was sent for analysis. However, an evaluation was not performed as to the possible detrimental effects to the pump due to water being present.

Your response also stated that maintenance had been performed in accordance with reference (d) under WRs 000929 PRF, 000609 MNT, and 008000 OPS. These WRs are not related to and do not involve preventive maintenance. The lack of safety injection pump lubrication is an indication of a possibly much broader problem involving the reliability of all safety-related components due to poor preventive maintenance practices.

In summary, we have concluded that the additional information provided in your response does not provide a basis for withdrawing this violation.

A meeting was conducted between Duke Power Company and Region II inspectors on June 19, 1984 during a routine inspection to discuss all aspects of these violations. Duke representatives were informed why the program was not comprehensive enough to meet current regulatory requirements for preventive maintenance. Measures must be established to cover the time frame from provisional turnover to operational acceptance relative to preventive maintenance. This system was not in place or being adequately addressed. The inspector clarified the need for a formal basis for waiving preventive maintenance requirements for the safety injection pumps operationally accepted (base line data taken) January 28 and February 8, 1983. Additional information could not be provided to assure that preventive maintenance was performed. An engineering evaluation was not performed to waive existing lubrication requirements. An evaluation was not performed to determine if the water found in the pump could cause permanent damage.

Based on these discussions, Duke representatives stated that this issue would be addressed in an amended response to the Region II Notice of Violation.