

ENCLOSURE

NOTICE OF VIOLATION

Duke Power Company
Catawba 1

Docket No. 50-413
License No. CPPR-116

The following violations were identified during an inspection conducted on February 21 - March 2, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. 10 CFR 50, Appendix B, Criterion XIII as implemented by the licensee's accepted quality assurance program (Duke 1-A, Amendment 6) requires that measures be established to control handling and storage of material and equipment. The QA program conforms to Regulatory Guide 1.38 and endorses ANSI N45.2.2-1972, Packaging, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants. Sections 2, 6, and 7 of this standard require that design specifications and drawings be reviewed and that written procedures be prepared to control storage and handling activities.

Contrary to the above, 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 machined parts.

This is a Severity Level IV Violation (Supplement II).

2. 10 CFR 50, Appendix B, Criterion V as implemented by the licensee's accepted quality assurance program (Duke 1-A, Amendment 6) requires that activities affecting quality be accomplished in accordance with written procedures. The QA program conforms to Regulatory Guide 1.38 and endorses ANSI N45.2.2-1972, Packaging, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants. Section 3.3.2 of this standard requires that nonconforming items shall be identified and segregated to prevent inadvertent use.

Contrary to the above, and to paragraph 4.2 of 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.

This is a Severity Level IV Violation (Supplement II).

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3. 10 CFR 50, Appendix B, Criterion II as implemented by the licensee's accepted quality assurance program (Duke-1-A, Amendment 6) requires that activities affecting quality shall be accomplished under suitably controlled conditions. The QA program conforms to Regulatory Guide 1.33, Revision 2, which endorses ANSI N18.7-1976/ANS 3.2, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants. Section 5.2.7.1 of this standard requires that a preventive maintenance program for safety-related structures, systems, and components shall be established and maintained.

Contrary to the above, activities affecting quality are not being performed under suitably controlled conditions in that:

- a. The licensee's preventive maintenance programs do not include all safety related structures, systems, and components turned over for operational control.
- b. The station lubrication program is not being implemented relative to the Safety Injection System (SI). 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.

This is a Severity Level IV Violation (Supplement II).

4. 10 CFR 50, Appendix B, Criterion XVI as implemented by the licensee's quality assurance program (Duke 1-A, Amendment 6) requires that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material, and equipment, and nonconformances are promptly identified and corrected. The identification of the significant condition adverse to quality, the cause of the condition, and the corrective action taken shall be documented and reported to appropriate levels of management. The QA program conforms to Regulatory Guide 1.64, Revision 2, and endorses ANSI N45.2.11-1974, Quality Assurance Requirements for the Design of Nuclear Power Plants. Section 9, of this standard requires that corrective action for significant or recurring deficiencies shall include determining the cause and instituting appropriate changes in the design process and the quality assurance program to prevent similar deficiencies. This section further requires that a procedure shall be employed for providing such corrective action.

Contrary to the above, the Nuclear Station Modification (NSM) request initiated to correct a design nonconformance in Unit 1 Auxiliary Feedwater system discovered during functional testing is being processed such that:

- a. The controlling procedure for design nonconformances PR-202, which delineates the method by which a design nonconformance is identified, reported, evaluated, and resolved is not being implemented. The

non-application of PR-202 to NSM request initiated to correct the AFW system design nonconformance is permitted by PR-160. This procedure is the controlling document for NSMs and delineates the method for processing, controlling, approving, and clearing NSMs within Design Engineering. Paragraph 1.2, the last sentence of procedure PR-160, states as a recommendation, the need for NSMs initiated to correct a deficiency to be accompanied by a design nonconformance report.

- b. The NSM was initiated to correct a design nonconformance in the Auxiliary Feedwater System, a QA Condition 1 system, and must be evaluated for significance and reportability.

This is a Severity Level IV Violation (Supplement II).

5. 10 CFR 50, Appendix B, Criterion VI as implemented by the licensee's quality assurance program (Duke 1-A, Amendment 6) requires that measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is being performed. The QA program conforms to Regulatory Guide 1.64, Revision 2, and endorses ANSI N45.2.11-1974, Quality Assurance Requirements for the Design of Nuclear Power Plants. Section 4.3 of this standard requires that procedures shall be established for preparation and control of drawings.

Contrary to the above, procedural measures do not provide for recall of drawings made obsolete by voided variation notices. Variation Notice Serial Number 41747 was prepared to add vent and drain valves and to relocate one vent valve on Unit 2, Auxiliary Feedwater System Flow Diagram, Drawing Numbers CN 2592-1.0 and CN 2592-1.1. This Variation Notice was approved on November 14, 1983, and subsequently voided. Controlled copies of the above drawings indicate in the revision block that the drawings were revised by Variation Notice 41747. The controlling procedure, PR-201, for processing variation notices is inadequate in that it does not address recall of drawings made obsolete by voided Variation Notices.

This is a Severity Level V Violation (Supplement II).

Pursuant to 10 CFR 2.201, you are required to submit to this office within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved.

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Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

Date: APR 19 1984