

DUKE POWER COMPANY

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HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

June 29, 1984

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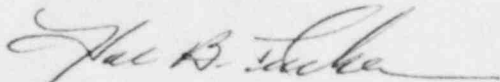
Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30303

Re: RII:BTD
50-413/84-45

Dear Mr. O'Reilly:

Please find attached responses to Deviation No. 413/84-45-01 and Violation No. 413/84-45-02 as identified in the above referenced inspection report. Duke Power Company does not consider any information contained in this inspection report to be proprietary.

Very truly yours,



Hal. B. Tucker

LTP/rhs

Attachment

cc: NRC Resident Inspector
Catawba Nuclear Station

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DUKE POWER COMPANY
CATAWBA NUCLEAR STATION

VIOLATION: No. 413/84-45-02

10 CFR 50 Appendix B, Criterion V states, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances, and shall be accomplished in accordance with these instructions, procedures, or drawings.

Contrary to the above, the licensee did not establish specific plant procedures or instructions governing their Cold License Certification Observation training.

Response:

1. Duke admits the violation as stated.
2. The reason the violation occurred was failure to translate the broad program requirements into sufficient detail instruction, to assure training was consistent and properly documented.
3. Corrective steps which have been taken include:
 - (a) An independent audit was performed on Cold License Group 1 by Duke's Operations General Office staff. This audit was completed on June 1, 1984. An audit is presently being performed on Cold License Group 2 and will be completed by July 5, 1984
 - (b) All discrepancies as a result of the audits will be resolved by July 5, 1984.
 - (c) "Task Training Cold License Preparation" documents formal guidance for present task lists.
 - (d) Individuals involved have been instructed on the importance of proper documentation and performance of tasks.
4. Formal procedures are being developed and will be in place prior to beginning Hot License training. These procedures should prevent recurrence.
5. Full compliance will be achieved prior to beginning Hot License training.

DUKE POWER COMPANY
CATAWBA NUCLEAR STATION

DEVIATION: No. 413/84-45-01

Catawba Nuclear Station Final Safety Analysis Report Section 13.2.2.2.2(k) states, in part, that the Cold Certification Observation Check List provides structured guidance for required observation tasks.

Cold License Certification Program description, Duke Power File No. OS-943/OPS-NRC, presented to and accepted by the NRC in October 1977, states, in part, that the Cold Certification Observation task date shall be the date the task is signed off as being observed.

Contrary to the above, in two instances, the Cold Certification Observation Check Lists were incorrectly documented as completed.

Response:

1. Duke admits the deviation as stated.
2. The reason for the deviation was a failure to establish and implement a formal procedure governing the conduct of Cold License Certification Observation training.
3. Corrective steps which have been taken include:
 - (a) An independent audit was performed on Cold License Group 1 by Duke's Operations General Office staff. This audit was completed on June 1, 1984. The results of this independent audit indicated that the two individuals in question had completed the task list, however, they were incorrectly documented as the above deviation states. An audit is presently being performed on Cold License Group 2 and will be completed by July 5, 1984.
 - (b) All discrepancies identified as a result of the audits will be resolved by July 5, 1984.
 - (c) Individuals involved have been instructed on the importance of proper documentation and performance of tasks.
 - (d) "Task Training Cold License Preparation" documents formal guidance for present task lists.
4. Formal procedures are being developed and will be in place prior to beginning Hot License training. These procedures should prevent recurrence.
5. Full compliance will be achieved prior to beginning Hot License training.