

NOV 01 1984

ENCLOSURE 1

NOTICE OF VIOLATION

Duke Power Company
Catawba

Docket No. 50-413
License No. NPF-24

The following violations were identified during an inspection conducted on August 26 - September 25, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. Technical Specification 6.8.1 requires that written procedures shall be implemented. Performance Test PT/1/A/4200/10A, Residual Heat Removal (RHR) Pump 1A, step 12.20.3 requires that if inservice test quantities fall within the required action range of the acceptance criteria that the control room SRO and the test supervisor be notified of pump inoperability.

Contrary to the above, the RHR pump test was performed per procedure PT/1/A/4200/10A on September 8, 1984 and the test data fell within the required action range. The test technician failed to recognize this discrepancy and the pump was not declared inoperable until September 18, 1984.

This is a severity Level IV violation (Supplement I).

2. Technical Specification 6.8.1 requires that written procedures shall be implemented and maintained covering the activities of procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Per Appendix A of Regulatory Guide 1.33, administrative procedures are required for equipment control. Operations Management Procedure 2-9, Revision 8, Administration and Control of Keys, requires the following:

- a. Paragraph 3.2 requires access to site keys to be under direct control of the Shift Supervisor or his designee and also requires the key locker to be kept locked at all times.
- b. Paragraph 6.4.B requires that, for long term removal keys, the reason for removal be logged in the Key Log and Master Key Index.
- c. Paragraph 7.1.D requires all keys to be logged out in the Key Log when removed from the key locker.

Contrary to the above, on September 13, 1984, key control was not performed in accordance with procedure requirements, in that:

- a. The key locker was left unlocked and unattended.

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- b. Reasons for long term removal of keys were not logged in either the Key Log or Master Key Index.
- c. Key No. 695 was not in the key locker and was not logged out on either the Key Log or Master Key Index. Kirk keys were not logged out on the Key Log. Examples are Nos. 690, 692, 693, 694, 697, 699, 703, and 704.

This is a Severity Level IV violation (Supplement I).

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.

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: NOV 01 1984