Official

December 28, 1987

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

Gentlemen:

SUBJECT: NRC INSPECTION REPORT NOS. 50-413/87-13 AND 50-414/87-13

Your letter of September 4, 1987, provided comments on the subject inspection report. The NRC staff's evaluation of your comments is provided in the enclosure to this letter.

Should you have any questions concerning this letter, please contact us.

Sincerely,

(Original signed by C. A. Julian)

Caudle A. Julian, Chief
Operations Branch
Division of Reactor Safety

Enclosure:
Staff's Assessment of Licensee's Response

cc w/encl:
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bcc w/encl:
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RII	RII	RII	RII
LWatson:bm	MShymlock	CJulian	T Peebles 12/28/87
12/17/87	12/24/87	12/28/87	

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ENCLOSURE

STAFF'S ASSESSMENT OF LICENSEE'S RESPONSE

1. Section 6. The comment was that two changes made to the emergency procedures were not exceptions to the safety significant deviation list. The NRC staff finds that Section 6 of NRC Inspection Report 327, 328/87-13 was inappropriately worded in that the changes made by the licensee should not have been characterized as "exceptions" to the deviations approved by the NRC. As stated in the report, the NRC reviewed these items and found that adequate safety evaluations had been written for the changes. Also, as stated in the report, no deviations from commitments were identified.

2. Section 7.a.2.a. The licensee's comment indicated that these inspection report findings were not appropriate since the comments were related to plant-specific information in the Emergency Procedure Guidelines (EPGs). The plant staff informed the NRC during the inspection that the EPGs and Emergency Procedures (EPs) were written at the same time by the corporate staff and the plant staff, respectively, and therefore, the EPGs were not necessarily used as a guideline for the EPs, but rather the technical review against the EPG was accomplished in some cases after the EP was drafted. The comments in this section were intended to provide the licensee with feedback on areas where the inspectors believed the EPGs should be revised to include important technical information that was included in the EP. The procedure sections discussed in the report may also contain plant specific procedure numbers or specific methods, however, the staff believes that the comments are a part of the basic technical accident mitigation guidance and therefore the staff recommends that the comments be included in the EPGs. The licensee had also indicated that the EPGs were used as a generic document for other sites, therefore, the licensee should also consider changing the EPGs for those comments which could affect the technical adequacy of procedures at other sites where these comments may not be picked up in the site review.

3. Section 7.a.2.a.(8). The comment indicated that the action/expected response of "Maintain SG NR level approximately 38%" and the response not obtained in step 6.c which directs the operator to "Control CA flow as necessary," had been combined in the EP. The NRC staff finds that this comment is correct and withdraws finding 7.a.2.a.(8).

4. Section 7.a.2.c.(3). The comment involves EP/1/A/5000/1C, High Energy Line Break Inside Containment. If the operator fails to have an indication of an increase in containment sump level (Step 4.c), the licensee maintained that the operator should evaluate the conditions on a situation specific basis prior to entering EP/1/A/5000/1C6, LOCA Outside Containment. The NRC staff believes that referencing 1C6, as is currently done in 1C, introduces unnecessary confusion. Entering 1C6 would allow the proper diagnostics to be performed to determine if the LOCA was outside containment, instead of stopping the operator at this point to perform an evaluation with no guidance or requiring the operator to perform the procedures simultaneously.

During discussions at the site with the Supervising Design Engineer, the licensee indicated that they concurred with this comment and would change the procedure. In that the licensee has changed their position and since the current wording depends heavily on appropriate operator training, the staff will evaluate operator knowledge and training on these conditions during the next inspection.

5. Section 7.a.2.c.(6). The comment indicated that steps 10-13 of EP/1/A/5000/1C, High Energy Line Break Inside Containment, form a three way diagnostic branch to the appropriate SI termination procedure. The comment further indicated that Step 13 of this procedure is "merely one of three possible procedure exits after satisfaction of the SI termination criteria in Step 9."

   Step 9 is a diagnostic step for SI termination. Step 13 states: "To terminate S/I:... Go to EP/1/A/5000/1C1." The staff was concerned that separation of the steps, considering that Step 13 was not a direct "Go to" statement, would introduce confusion. The Westinghouse ERG E1, Loss of Reactor or Secondary Coolant, background document indicates that these steps should be placed in sequence and phrases the step equivalent to Step 13 as a direct "Go to" statement. The Catawba EPG also phrases the step as a direct "Go to" statement. The NRC staff discussed this concern with the licensee and recommended that the licensee eliminate the phrase "To terminate SI" (which implies that additional operator evaluations are needed) from Step 13 and make this statement an emphatic "Go to" statement.

   The NRC staff also recommended that intervening diagnostic steps be evaluated to confirm proper placement in the procedure. The diagnostic for a steam generator tube rupture (SGTR) appeared to be inappropriately placed in Step 10 in that Step 9 Response Not Obtained could result in exit to EP/1/A/5000/1C2, Post LOCA Cooldown and Depressurization, prior to the check for a tube rupture. This scenario appears to result in cooldown via EP/1/A/5000/1C2 instead of via EP/1/A/5000/1E3, SGTR with Continuous NC System Leakage: Subcooled Recovery. The NRC staff discussed this item with the licensee in a phone call on December 15, 1987, to clarify these concerns. The licensee agreed to review the sequence of the intervening steps. The NRC staff will review the resolution of this concern during future inspections.