DUKE POWER COMPANY
P.O. BOX 33189
CHARLOTTE, N.C. 28242

HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

TELEPHONE
(704) 373-4531

February 10, 1988

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Subject: Catawba Nuclear Station
Docket Nos. 50-413 and 50-414
IE Report 50-413/87-42
RII:CHB

Gentlemen:

Please find attached a response to Violation 413, 414/87-42-02 as identified in the subject Inspection Report.

Very truly yours,

Hal B. Tucker

Hal B. Tucker

LTB/20/jgc

Attachment

xc: Dr. J. Nelson Grace, Regional Administrator
U.S. Nuclear Regulatory Commission
Region II
101 Marietta St., NW, Suite 2900
Atlanta, Georgia 30323

Mr. P.K. Van Doorn
NRC Resident Inspector
Catawba Nuclear Station

IE01
1/1

DUKE POWER COMPANY
REPLY TO A NOTICE OF VIOLATION
413, 414/87-42-02

Technical Specification 4.8.1.1.3 requires that all diesel generator failures, valid or non-valid, be reported in a Special Report to the Commission pursuant to Specification 6.9.2 within 30 days.

Technical Specification 6.8.1 requires that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A to Regulatory Guide 1.33, Revision 2.

Operations Management Procedure 2-28, Revision 11, Diesel Generator Logbook, section 3.3 requires that each diesel generator start attempt be classified as either a Valid Success, Valid Failure, Invalid Test or Invalid Failure.

Contrary to the above, on November 13, 1987, the licensee failed to properly classify start attempt number 548 on Diesel Generator 1A as an Invalid Failure and therefore failed to report the event to the Commission in a Special Report within 30 days.

RESPONSE:

1. Admission or Denial of Violation
   Duke Power Company admits the violation.

2. Reasons for Violation if Admitted
   A. The initial assessment of the 1A Diesel Generator trip following start number 548 concluded that the failure of the P-3 shuttle valve had most likely resulted from recently performed maintenance on the pneumatic control system. This maintenance was performed during the EOC-2 scheduled teardown and inspection of 1A Diesel Generator. This particular start was being performed for maintenance as part of the break in runs for the diesel after the teardown and inspection. The Diesel Generator at this point had not been declared operable by Operations personnel following the tear down and inspection. Based on the information that was available at that time and since the diesel had not yet been declared operable, it was decided that this trip could be classified as an invalid test and be within the guidelines of OMP 2-18. Subsequent problems with the 1B Diesel Generator similar to 1A problem led to a more extensive review of the P-3 shuttle valve design. Based on this review and extensive

troubleshooting, it was determined that this component had a lower than desirable reliability. At this point, a thorough review was conducted. This led to a different component (OR-GATE) being tested. The extensive testing proved the new component (OR-GATE) to be superior to the previous component (P-3 Shuttle Valve). At this point it was decided to replace the P-3 Shuttle Valve with the OR-GATE in all four of the Diesel Generators at Catawba. Since the replacement with the OR-GATE, Catawba Unit 1 and 2 has experienced no failures of the diesels during the starts. Discussions with the NRC Resident Inspector during the first week of December 1987 resulted in the classification of start number 548 as an invalid test being questioned. The classification was again reviewed by Operations using the information obtained from the problems on 1B diesel engine. Additionally, a more thorough review of the specific maintenance on 1A Diesel Engine Pneumatic Control System revealed no specific maintenance had been performed on the P-3 shuttle valve prior to start number 548. On December 8, 1987 the start number 548 was reclassified as an invalid failure.

The cause of this violation can be attributed to Personnel error because the initial investigation was not thorough enough, and another review of the 1A diesel trip was not conducted after a similar failure on 1B diesel occurred.

B. The Notice of Violation, paragraph 4, states that Duke Power Company failed to notify the NRC of the D/G invalid failure by Special Report within 30 days as required by TS 6.9.2.

We feel this is in error in that the determination of reportability (proper classification of the start attempt) was on December 8, 1987, and the Special Report was submitted on January 7, 1988.

Our interpretation of the 30 day reporting requirements is that the "clock" starts upon the determination that a reportable event has occurred. The D/G start attempt was not classified as an invalid failure until December 8, 1987. At that time, we began the 30 day "clock" for reporting requirements, and thus, submitted the Special Report on January 7, 1988.

3. Corrective Actions Taken and Results Achieved
1A Diesel Generator failure following start number 548 has been properly reported.

Invalid failure classification requirements of Regulatory Guide 1.108 Rev. 1, Periodic Testing of Diesel Generator Units as Onsite Electric Power Systems at Nuclear Plants, have not been interpreted correctly by station personnel. Discussions with the NRC Resident Inspector and information provided by the NRC Resident Inspector has resulted in OMP 2-28 being revised to reflect the current interpretation of the requirements.

4. Corrective Actions to be Taken to avoid further Violations
All subsequent diesel generator failures will be investigated and reported by the station Safety Review Group (SRG). This will result in a greater degree of independence in the evaluation process, and improve the quality of the reports.

5. Date of Full Compliance
Duke Power Company is now in full compliance.