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July 15, 1988

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

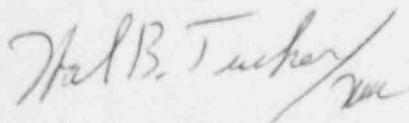
Subject: Catawba Nuclear Station, Units 1 and 2  
Docket Nos. 50-413 and 50-414  
NRC Inspection Reports Nos. 50-413, -414/88-18

Gentlemen:

Please find attached responses to the two Severity level IV violations transmitted by V. L. Brownlee's (NRC) letter dated June 17, 1988.

During the preparation of the response to this violation, a review of the other identified missed retests was conducted. While a common root cause for the missed retests could not be identified, certain program enhancements were recommended which should minimize the potential for missed retests. These enhancements are being evaluated for incorporation into station programs.

Very truly yours,



Hal B. Tucker

JGT/60/sbn

Attachment

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

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

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DUKE POWER COMPANY  
REPLY TO A NOTICE OF VIOLATION  
413, 414/88-18-01

10 CFR 50, Appendix B, Criterion XII as implemented by Quality Assurance Program (Duke 1-A, Amendment 11) Section 17.2.12 requires in part that measures be established to assure that instruments and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated and adjusted at specified periods to maintain accuracy within necessary limits.

Contrary to the above, the licensee failed to establish measures to assure that stopwatches used in activities affecting quality were properly controlled, calibrated and adjusted in that an uncontrolled personal wristwatch was used on May 18, 1988, to verify the motor operated damper (1ARF-D2) in the containment air return fan discharge line opened with a 10 +/- 1 second delay after a test signal. A program for calibrating stopwatches has not been established.

RESPONSE:

1. Admission or Denial of Violation

Duke Power Company admits the violation.

2. Reasons for Violation if Admitted

Management deficiency.

3. Corrective Actions Taken and Results Achieved

- a. All stopwatches that were used as uncontrolled test equipment were removed from site.
- b. New stopwatches that can be calibrated were bought and put in service immediately.
- c. Calibration schedule was established with the manufacturer.
- d. The individual was counselled about using a wristwatch as controlled test equipment.
- e. All supervisors were counselled at their weekly staff meeting about proper use of test equipment. They, in turn, took the message to their people.
- f. Other station groups have reviewed the use of stop watches in their areas. No corrective actions were required as a result of this review.

4. Corrective Actions to be Taken to Avoid Further Violations

Actions taken in Section 3 above ensure avoidance of further or further violations.

5. Date of Full Compliance

Duke Power Company is now in full compliance.

DUKE POWER COMPANY  
REPLY TO A NOTICE OF VIOLATION  
414/88-18-04

Technical Specification 6.8.1 requires that written procedures shall be established, implemented, and maintained covering applicable procedures recommended in Appendix A to Regulatory Guide 1.33, Revision 2, Station Directive 3.2.2, Development and Conduct of the Periodic Testing Program, section 8.0 requires that after a valve has undergone maintenance and prior to its return to service, it shall be tested as necessary to demonstrate that the parameters affected by the maintenance are within acceptable limits.

Contrary to the above, maintenance was performed on valve 2BB-61B on March 15, 1988, and the valve was returned to service without being tested to demonstrate that the parameters affected were within acceptable limits.

RESPONSE:

1. Admission or Denial of Violation

Duke Power Company admits the violation

2. Reasons for Violation if Admitted

This event was caused by a Personnel Error.

Station procedures require safety-related valves with stroke time requirements to be cycled and timed following maintenance. Accordingly, a valve is not considered to be operable following maintenance until this test has been successfully completed. To assure that LCO time and mode change requirements are met, these items are tracked in the Tech Spec Action Items Logbook (TSAIL).

Various indications are used to signal the SRO that approval to begin work may require a concurrent TSAIL entry. These include:

1. The application of the "TECH SPEC RELATED" stamp by the work request originator.
2. The emergency power designation (A or B) at the end of the valve number.
3. The PRF Retest designation by the planner.
4. The SRO's knowledge of the plant systems and applicable technical specifications.

An Operations staff individual originated and approved a work request to adjust the packing on 2BB61B, a containment isolation valve, yet failed to apply the "TECH SPEC RELATED" stamp or to include the train designation at the end of the valve number. The SRO who authorized work to begin failed to observe the PRF Retest designation and did not recognize the valve as a containment isolation valve. No TSAIL entry was made and the unit was subsequently restarted without the proper retest being performed.

3. Corrective Actions Taken and Resulted Achieved

Subsequent surveillance test results were reviewed, and confirmation made that 2BB61B had been capable of closing within its specified time requirement at all times.

4. Corrective Actions to be Taken to Avoid Further Violations

If effectively implemented, the corrective actions to a previous violation in 1986 should have prevented this occurrence. Management direction is being provided to all persons who approve work requests to assure that station procedures which address proper identification of retest requirements are being followed.

Program enhancements beyond the corrective actions specified in this response are being evaluated for incorporation into the station retest program. The enhancements being evaluated include a station retest manual and various types of training for involved personnel.

5. Date of Full Compliance

Duke Power will complete these actions by August 15, 1988.