



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
101 MARIETTA STREET, N.W.  
ATLANTA, GEORGIA 30323

Report Nos.: 50-413/88-29 and 50-414/88-29

Licensee: Duke Power Company  
422 South Church Street  
Charlotte, NC 28242

Docket Nos.: 50-413 and 50-414

License Nos.: NPF-35,  
NPF-52

Facility Name: Catawba 1 and 2

Inspection Conducted: August 1-5, 1988

Inspector: L. S. Mellen 8/31/88  
L. S. Mellen, Lead Inspector Date Signed

Accompanying Personnel: T. Cooper

Approved by: G. A. Belisle 8/31/88  
G. A. Belisle, Chief Date Signed  
Quality Programs Section  
Operations Branch  
Division of Reactor Safety

SUMMARY

Scope: This routine, unannounced inspection was conducted in the areas of the Catawba Safety Review Group (CSRG) activities and 10 CFR 21 reportability determinations. The inspection was conducted on-site and at the Duke Power Company general offices.

Results: One violation was identified related to the CSRG not meeting Technical Specification requirements.

Within the areas inspected, the following findings were identified:

- Failure to comply with Technical Specification requirements for CSRG functions, paragraph 2.a.
- A weakness (IFI) relative to lack of adequate procedural guidance in 10 CFR 21 reportability determinations, paragraph 3.

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## REPORT DETAILS

### 1. Persons Contacted

#### Licensee Employees

- L. Burba, Licensing Engineer
- \*M. Cote<sup>1</sup>, Compliance Engineer
- C. Criminger, CSRG Member
- H. Edwards, Design Engineer
- J. Fraedrich, former CSRG Member
- \*R. Futrell, Nuclear Safety Review Board (NSRB) Chairman
- W. Green, former CSRG Member
- \*R. Glover, Compliance Engineer
- R. Hall, NSRB Member
- M. Hone, former CSRG Member
- R. Kirk, CSRG Member
- M. LaForrest, former CSRG Member
- \*P. LeRoy, Licensing Engineer
- J. Lines, CSRG Member
- B. McNeill, CSRG Member
- D. Murdoc, NSRB Member
- S. Rose, Technical System Manager
- N. Rutherford, Technical System Manager
- L. Schlise, former CSRG Member
- H. Smith, former CSRG Member
- \*R. White, CSRG Chairman

#### NRC Resident Inspectors

- K. Van Doorn, Senior Resident Inspector
- \*M. Lesser, Resident Inspector

Other licensee employees contacted included engineers, technicians, licensing personnel, compliance personnel, security force members, and office personnel.

#### \*Attended exit Interview

### 2. CSRG Assessment

Technical Specifications Section 6.2.3, implements some requirements of NUREG 0737, Clarification of TMI Action Plan Requirements, and outlines requirements for CSRG activities. The inspectors reviewed CSRG actions taken to fulfill each requirement and discussed them with selected CSRG members, former CSRG members, and the NSRB and CSRG chairmen. The various areas covered by the requirements are outlined in the following four sections:

a. Technical Specification (TS) 6.2.3.1: FUNCTION

The Catawba Safety Review Group (CSRG) shall function to examine plant operating characteristics, NRC issuances, industry advisories, REPORTABLE EVENTS, and other sources which may indicate areas for improving plant safety. The CSRG shall make detailed recommendations for revised procedures, equipment modifications, or other means of improving plant safety to the Director, Nuclear Safety Review Board.

The inspector identified that all requirements of TS 6.2.3.1 were not being fulfilled by the CSRG. The functions that not were being performed by CSRG were being performed by other Duke Power organizations. While NRC issuances, industry advisories, and selected documents from other sources are reviewed by the various members of the CSRG, this review is not performed with the task of developing detailed recommendations for improving plant safety, as the TS Section requires. Discussions with the CSRG Chairman revealed that this function is coordinated by members of the Safety Assessment group in the General Office. The members of the CSRG are occasionally requested to verify the effectiveness of the implemented improvements, but this is not done on a routine basis.

The CSRG is required to perform reviews of plant operating characteristics. The in-plant reviews performed by the CSRG are considered to fulfill this requirement. The inspectors reviewed the monthly reports from January 1988 through June 1988 and found that during this period only one in-plant review was performed. The CSRG demonstrated that there are six in-plant reviews presently being performed, in response to findings at another site. The directions for this activity do not explicitly describe it as the medium under which the review of plant operating characteristics will be performed.

Detailed procedural guidance for the performance of the assigned responsibilities is not available to the members of the CSRG. This reduces the consistency and continuity of the performance of these functions by the various members, past and present, of the CSRG. The CSRG Chairman agreed with this assessment and stated that improvements in this area would be developed.

The failure of the CSRG to perform all of it's required duties related to all functions outlined in the site Technical Specifications is considered violation 413,414/88-29-01.

b. TS 6.2.3.2: COMPOSITION

The CSRG shall be composed of a chairman and at least four dedicated, full-time qualified individuals located onsite.

The CSRG is composed of the chairman and six members of the plant staff who rotate into this position for a twelve month period.

The inspectors reviewed the training program for the CSRG members and while it appears to be a detailed program, the time that can be dedicated to the training program is minimal, caused by the short time that the various members are present in the group and the large work load that must be completed by this group. The short tenure period for the rotating members of the CSRG also results in the CSRG chairman spending a large amount of his time in the training of the new members, as they rotate into the assignments in the CSRG.

c. TS 6.2.3.3: RESPONSIBILITIES

The CSRG shall be responsible for maintaining surveillance of plant activities to provide independent verification that these activities are performed correctly and that human errors are reduced as much as practical.

The inspectors reviewed the list of completed tasks for the last six months and noted that only one in-plant review was included on the list. The CSRG is aware of this, in light of the findings at another site, and were able to demonstrate an increase in the number of in-plant reviews currently being performed.

The CSRG has assigned a member to review the number of events caused by human error and develop recommendations to reduce the number of future events. This is a recently developed project, however, and no results were demonstrable.

d. TS 6.2.3.4: RECORDS

Records of activities performed by the CSRG shall be prepared, maintained, and forwarded each calendar month to the Director, Nuclear Safety Review Board.

The inspectors reviewed approximately 15 of the most recent investigation reports generated by the CSRG and noted that they were detailed and complete. Interviews were conducted with the majority of the present CSRG members and with several past CSRG members and reviewed several draft reports and determined that the plant staff did not exert undue influence on the CSRG on the content of the report. Changes to the draft reports generated by plant staff were clarifications or corrections of incorrect information and were not used to change the content of the report.

3. 10 CFR 21 Determinations

The inspectors interviewed members of Catswba Site Compliance, General Office Nuclear Licensing, and General Office Design Engineering to determine the effectiveness, process, and philosophy in reporting defects under 10 CFR 21.

An example of the process used in a 10 CFR 21 determination was reviewed, involving the shuttle valves used on the emergency diesel generators (EDGs). General Office Design Engineering performed an evaluation on December 7, 1987, which determined that the continual problems with the EDGs caused by the use of these valves was reportable under 10 CFR 21. On December 23, 1987, General Office Nuclear Licensing issued a memorandum stating that the initial determination from Design Engineering was incorrect and that Licensing's initial determination was that the item was not reportable under 10 CFR 21 requirements. On March 9, 1988, the Licensing group issued a final determination that the item was not reportable, using the reasoning that the misapplication of the shuttle valve did not constitute a defect and that it resulted in a reliability concern and not an operability concern, even though the use of the shuttle valve resulted in intermittent trips of the EDGs. This determination was made based on operability determinations performed by the site Compliance group.

The inspectors reviewed the Design Engineering procedure and the Station Directive which provides the directions for performing an evaluation for 10 CFR 21 reporting. Design Engineering Procedure, PR-203, Problem Investigation Reports, Revision 4 provides detailed directions for the Design Engineer who is performing 10 CFR 21 evaluations. Station Directive 2.8.1, Problem Investigation Process and Regulatory Reporting, Revision 9 does not provide detailed directions for performing evaluations. The inspectors noted that the procedures do not assign the responsibility of 10 CFR 21 determinations and reporting to any one group other than Nuclear Production.

This lack of detailed directions for performing 10 CFR 21 evaluations in Nuclear Production procedures and the lack of procedural guidance for the responsibility of performing these evaluations is considered a weakness and is identified as Inspector Followup Item 413,414/88-29-02.

Within this area, no violations or deviations were identified.

#### 4. Exit Interview (30703)

The inspection scope and findings were summarized on August 5, 1988, with those persons indicated in paragraph 1 above. The inspectors described the areas inspected and discussed the inspection findings listed below. The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspectors during the inspection. Dissenting comments were not received from the licensee.

<u>Item Number</u>	<u>Description and Reference</u>
413, 414/88-29-01	Violation - Failure to comply with Technical Specification requirements for CRGR functions, paragraph 2.a.
413, 414/88-29-02	IFI - lack of adequate procedure guidance in 10 CFR 21 reportability determinations, paragraph 3.