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May 20, 1988

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

Subject: RII/ST/MT  
Catawba Nuclear Station  
Docket Nos. 50-413 and 50-414  
IE Report 50-413,-414/88-05  
Violation 413/88-05-01

Dear Sir:

In response to questions raised during a telecon on May 16, 1988 with Region II Staff concerning the subject Violation, we are herewith submitting clarifying remarks which should supplement our original response of March 25, 1988.

Very truly yours,

*H. B. Tucker*  
Hal B. Tucker

LTB/18/sbn

Attachments

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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Violation 413/88-05-01

The following is provided in response to questions/concerns identified during our May 16, 1988 discussion of the initial response of March 25, 1988.

(1) Omission of Attachment 1 to initial response.

- Attachment 1 as referenced on page 4 of the initial response was omitted from the transmittal. This sheet titled "Rotork Movats Test Summary" was developed by station personnel to summarize the results of individual valve tests. As stated in the initial response, the completed forms intended distribution was to Duke Power Design Engineering and a station file. A copy of this form is included as attachment 1 to this transmittal.

(2) Verbal notification from work supervisor used to identify "not applicable" (N/A) steps.

- The specific wording used in this portion of the initial response (bottom p. 6 and top p. 7) seems to have caused some confusion concerning the work supervisor's method to communicate procedure steps as N/A. The intent was to identify the process governing steps which, for some reason, were not required and had neither a data or sign-off blank directly associated with the individual step(s). Each data and sign-off blank was completed with the appropriate data/sign-off, or if not applicable, was marked as N/A. The blanks for the steps identified by the work supervisor as not applicable to the test method being used were marked as such prior to field personnel receiving the work package. Any changes in job scope or conditions which eliminated the need for additional steps to be performed would be reviewed by the work supervisor and the associated data/sign-off blanks would then be marked as N/A by the work supervisor. If the procedure did not include corresponding data/sign-off blanks, it was deemed unnecessary to physically mark these steps as N/A since only sheets containing data/sign-off blanks are normally retained with the completed procedures. Only for steps not requiring data recording or sign-off blanks would verbal communication from the work supervisor to the field personnel be considered as sufficient notification that step(s) should not be performed.
- Though the title indicates that testing is involved, procedure IP/0/A/3820/02A was written as an instrument procedure (IP) rather than a test procedure (TP). An important difference is that IP's typically provide more flexibility to allow for use under various plant conditions while TP's are designed to produce expected results under predetermined conditions. The objective of this procedure was to measure and verify that valve actuator thrust outputs were in accordance with values specified by valve manufacturers/Design Engineering. Meeting this objective was essential in each case and was controlled by appropriate procedure steps requiring comparison of measured and desired values. Additional data was to be collected (motor current, motor load, etc.) for possible diagnostic or future use but was not considered essential in meeting the procedure objective. Procedure steps referencing this additional data collection could be

omitted, if necessary, without any affect on measuring and verifying the essential data required by the procedure. If necessary to omit these "non-essential" steps, the same N/A process as previously outlined would be used. Omission of "essential" steps (those involving measurement and verification of thrust values) was not permitted since these steps were always necessary to satisfy the procedure objective.

- Each use of procedure IP/O/A/3820/02A was in conjunction with a station work request which dictated the review and approval process required for associated procedures. Following job completion the entire work package (work request and all procedures) are reviewed and approved by the work supervisor and then by technical support. Each independent review involves verification that the work performed satisfies the work requested and that all required procedure data and sign-offs are complete and accurate. This process provides additional assurance that all necessary procedure steps were properly completed and documented.

CATAWBA NUCLEAR STATION  
ROTORK MOVATS TEST SUMMARY

VALVE TAG #: _____	ACTUATOR SIZE: _____
VALVE ITEM #: _____	ACT. SERIAL #: _____
TEST DATE: _____	
W/R #: _____	

DESIGN TARGET VALUES:

	<u>MIN</u>	<u>MAX</u>
THRUST @ CST:	_____	_____
SEAT THRUST @ CST:	_____	N/A
RUNNING LOAD:	_____	N/A

AS FOUND DATA:

	<u>OPEN</u>	<u>CLOSE</u>
TORQUE SWITCH SETTING:	_____	_____
THRUST @ CST:	_____	_____
TOTAL THRUST:	_____	_____
STALL THRUST:	_____	_____

ACTION TAKEN: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

AS LEFT DATA - OFF VALVE:

TORQUE SWITCH SETTING		THRUST @ CST	
<u>OPEN</u>	<u>CLOSE</u>	<u>OPEN</u>	<u>CLOSE</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

AS LEFT DATA - ON VALVE:

	<u>OPEN</u>	<u>CLOSE</u>
TORQUE SWITCH SETTING:	_____	_____
THRUST @ CST:	N/A	_____
SEAT THRUST @ CST:	N/A	_____
RUNNING LOAD:	_____	_____
TOTAL THRUST:	N/A	_____
CYCLE TIME: _____ sec	BYPASS TIME: _____ sec	

ACTION TAKEN: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

FOLLOW-UP W/R: \_\_\_\_\_  
 dssum.txt