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HAL B. TUCKER VICE PRESIDENT SUCLEAR PRODUCTION

US MAR 4 P12: 49

February 24, 1986

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

Re: RII:PKV/PHS Catawba Nuclear Station 50-414/85-56

Dear Dr. Grace:

Attached is a revision to our initial response to Violation 414/85-56-01, which was transmitted by my letter of January 10, 1986. This revision is being made to clarify our intent to fully evaluate any significant water hammer event.

Very truly yours,

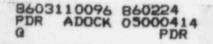
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Hal B. Tucker

LTP:slb

Attachments

cc: NRC Resident Inspector Catawba Nuclear Station



Violation 50-414/85-56-01

10 CFR 50, Appendix B, Criterion V as implemented by Duke Power Company (DPC) Topical Report DUKE-1-A, Section 17.1.5.2 requires that activities affecting quality be accomplished in accordance with established procedures. DPC QA Procedure Q1, Rev. 24 requires licensee personnel to initiate a Nonconformance Item Report (NCI) for items which do not meet design requirements and which are unable to be addressed through other established mechanisms.

Contrary to the above, a water hammer which occurred in April 1985 involving the Containment Spray System was not documented on an NCI resulting in an incomplete evaluation. The water hammer resulted in at least one hanger, 2-R-NS-0080, being partially pulled out of the wall and which was not discovered by Duke personnel.

Response:

1. 84

- (1) Duke Power Company admits the violation.
- (2) This violation occurred as a result of an error in technical judgement by the responsible Test Engineer, during one pump (2B) start of the preliminary test for the Containment Spray (NS) system. Test assistants, positioned along the test boundary, reported a loud bang in the pipe with accompanying movement. The Test Engineer investigated this event and based upon discussions with the test technicians along the boundary, determined the potential water hammer was confined to an area on elevation 577 in the penetration room. The Test Engineer personally inspected this area and discovered no damage. This evaluation led the Test Engineer to determine the event was not significant and did not need to be elevated to a Non-conforming Item Report or be further evaluated.
- (3) This water hammer event has since been elevated to a Non-conforming Item Report (#19956) and has been closed out following a Design Engineering evaluation and subsequent field inspection. The organization that existed at the time of this violation no longer exists. The responsibility for this testing during which the event occurred was within the Construction Department. However, currently, the responsibility for all pre-operational testing is that of Nuclear Production Operations. Since the potential for a recurrence of this does not exist within the Construction Department, no further corrective action was found to be necessary for Construction personnel. Further investigation has determined this event was an isolated case that occurred during the initial testing phase of construction.
- (4) Duke Power Company will reaffirm its position regarding the significance of water hammer events to appropriate Nuclear Production Operations personnel. Catawba Station Management will generate a letter instructing all appropriate individuals to evaluate water hammer events and take any necessary corrective action, based on the significance of the water hammer event.
- (5) Catawba will be in full compliance by March 1, 1986.