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DUKE POWER

September 16, 1988

U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Document Control Desk

Subject: Catawba Nuclear Station, Units 1 and 2
Docket Nos. 50-413 and 50-414
NRC Inspection Reports Nos. 50-413, -414/88-25
Reply to a Notice of Violation

Gentlemen:

Please find attached Duke Power Company's response to Severity level V violation No. 50-413, -414/88-25-01 which was transmitted by V. L. Brownlee's (NRC) letter dated August 19, 1988. This violation was caused by the failure to maintain two operable channels of valve position indication for the Pressurizer PORV block valves.

Very truly yours,

A handwritten signature in cursive script that reads "Hal B. Tucker".

Hal B. Tucker

FGL/

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
CATAWBA NUCLEAR STATION
VIOLATION 413, 414/88-25-01

Technical Specification 3.3.3.6 requires that the accident monitoring channels as shown in Table 3.3-10 be operable. The Action Statement specifies that with the number of operable accident monitoring instrumentation channels less than the Total Number of channels shown in Table 3.3-10, restore the inoperable channel(s) to operable status within 7 days, or be in ^{at} hot standby within the next 6 hours and in hot shutdown within the following 6 hours. Table 3.3-10 shows the Total Number of channels required for PORV Block Valve Position Indicator as 2/valve on Unit 1 and prior to May 27, 1988 as 2/Valve on Unit 2.

Contrary to the above, the licensee failed to maintain two operable channels per valve for PORV Block Valve Position Indicators from initial licensing until May 20, 1988 and failed to comply with the Action Statement.

Admission or Denial of the Violation

Duke Power admits the violation.

Reason for the Violation if Admitted

This Violation was attributed to a management deficiency due to an inconsistency in Technical Specification requirements and plant design. During the review of standard Technical Specifications to ensure that the design for PORV and PORV Block Valve Position Indication occurred with Catawba Technical Specifications, an oversight was made.

Corrective Steps Which Have Been Taken and the Results Achieved

1. Temporary Station Modification (TSM) 9732IAE was initiated which installed jumpers from the Unit 1 test patch panel to the Operator Aid Copmputer (OAC) to provide an independent position indication and to facilitate performance of surveillances on the Unit 1 PORV block valves. This modification satisfied the requirements of two independent channels of PORV Block Valve Indication on Unit 1.
2. An Emergency Technical Specification change was issued by the NRC on May 27, 1988 to allow Unit 2 PORV block valve indication requirements to be revised from 2/valve to 1/valve. This Emergency Technical Specification change was issued to preclude significant delays for the restart of Unit 2.
3. A Technical Specification interpretation was issued for Technical Specification 3.3.3.6. This interpretation describes the differences between the two units and the approach to use in the event of position indication inoperability.
4. A Technical Specification amendment request was sent to the NRC on July 11, 1988 to further clarify the requirements for PORV Block Valve Position Indication.

5. The Operations Periodic Test Procedures (Unit 1 and Unit 2) for Monthly Surveillance Items, were revised to reflect proper channel checks for the PORVs and PORV block valves.
6. All Compliance members have been reminded of the need to include all IFIs, URIs or Violation followup items on the Catawba Commitment List until completion.
7. Station Management is being provided monthly summaries of the Commitment List items identifying the total number of commitment items by group, which are past due. A letter, from the Station Manager, providing further control over the extension of Commitment dates and the intent to complete items as scheduled has been distributed to the Group Superintendents and Section Heads.

Corrective Steps Which Will Be Taken to Avoid Further Violations

Compliance will continue to work closely with the NRC Resident Inspectors on any items identified that differ from the strict words in the Technical Specifications to provide satisfactory resolution of the problem.

Date When Full Compliance Will Be Achieved

Duke Power is now in full compliance.