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DUKE POWER

September 16, 1988

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Subject: McGuire Nuclear Station  
Docket Nos. 50-369, -370  
Catawba Nuclear Station  
Docket Nos. 50-413, -414  
Reply to a Notice of Violation

Gentlemen:

Pursuant to 10CFR2.201, please find attached Duke Power Company's response to violations 370/88-20-01 and 369, 370/88-20-02 for the McGuire Nuclear Station (attachment no. 1), and violation 413, 414/C8-29-01 for the Catawba Nuclear Station (attachment no. 2).

Should there be any questions concerning this matter, contact S.E. LeRoy at (704) 373-6233.

Very truly yours,

Hal B. Tucker

SEL/328/mmf

Attachment

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September 16, 1988

Page 2

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MC 815.01

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(26)

ATTACHMENT NO. 1

Duke Power Company  
McGuire Nuclear Station  
Reply to Notice of Violation  
Inspection Report 50-369, 370/88-20

Violation 370/88-20-01

- A. Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1988.

Regulatory Guide 1.33, Revision 2, February 1978, Appendix A, requires that procedures be written, implemented, and maintained for energizing, filling, draining, startup, shutdown, and changing modes of operation of safety related systems.

McGuire procedure OP/2/A/6350/05, AC Electrical Operation Other Than Normal Lineup, specifies the method to be used to align 6900 volt switch gear assemblies to their alternate power supply.

McGuire procedure OP/2/A/6250/03A, Steam Generator Cold Wet Layup Recirculation, specifies the method to be used to drain and refill steam generators.

McGuire Operations Management Procedure 2-17, Tagout/Removal and Restoration (R&R) Procedure, states in part that the purpose of a Tagout (R&R) Record Sheet is to allow the removal and restoration of equipment to be accomplished in a specific manner by directing the sequence of the steps involved in repositioning the equipment and indicating the desired removal and return position.

Tagout R&R Number 28-616, Tagout for Busline 2B, specified the method to be used to realign the off-site electric power supply to Unit 2 to allow maintenance on busline 2B.

Example No. 1

Contrary to the above, procedure OP/2/A/6250/03A, Steam Generator Cold Wet Lay up Recirculation, was inadequate in that performance of the procedure caused an Engineered Safety Features actuation. The procedure failed to block the auto start signal to the turbine driven auxiliary feedwater pump on low-low level in two steam generators.

Reply to Example No. 1

1. Admission or denial of violation:  
The violation is admitted as stated.
2. Reason for the violation if admitted:

The IAE Technician involved misinterpreted plant data.  
Also, the Operating Procedure for draining the steam generators,

Steam Generator Cold Wet Layup Recirculation (OP/2/A/6250/03A), did not include steps to defeat the Steam Generator Low Low Level setpoint ESF actuation, even though this action is necessary and performed every time prior to draining the Steam Generators.

3. Corrective steps which have been taken and results achieved:

Operations personnel implemented a change to procedures OP/1&2/A/6250/03A, Steam Generator Cold Wet Layup Recirculation, which now include steps for IAE personnel to defeat the Steam Generator Low Low Level ESF actuation prior to draining a steam generator. Also, procedures OP/1&2/A/6100/01, Controlling Procedure for Unit Startup, were revised to include steps to verify the Steam Generator Low Low Level ESF Actuation is reinstated prior to entering Mode 4 (Hot Shutdown).

4. Corrective steps planned to avoid further violations:

Procedures OP/1&2/A/6250/03A, Steam Generator Cold Wet Layup Recirculation, will be revised to clarify the step to defeat all Feedwater Isolation signals. The clarification will specify which Feedwater Isolation signals are to be defeated.

5. Date when full compliance will be achieved:

October 1, 1988

Example No.2

Contrary to the above, procedure OP/2/A/6350/05, AC Electrical Operation Other Than Normal Lineup, was not properly implemented in that an incorrect electrical lineup of the Unit 2 6900 volt switch gear assemblies was made on June 24, 1988 which resulted in a loss of all Unit 2 off site power. In preparation for maintenance on the 2B off-site busline, a reactor operator incorrectly aligned all four 6900 volt switch gear assemblies to the 2B off-site busline instead of the 2A off-site busline as intended by the procedure. When the 2B busline was subsequently removed from service, a loss of all off site power occurred, causing an Engineered Safety Feature actuation.

Reply to Example No. 2:

1. Admission or denial of violation:

The violation is admitted as stated.

2. Reason for the violation if admitted:

The Operations personnel involved mistakenly powered all four 6900 V. switchgear assemblies from 2B busline prior to de-energizing 2B busline for work. The action taken by the individual involved was inadvertently directed toward the wrong goal because he performed the opposite action than he had intended to perform. The individual is an experienced operator who was fully qualified to perform this task.

3. Corrective steps which have been taken and results achieved:

- a. Normal off-site power was restored to Unit 2 by 1037 on June 24, 1988.
- b. Operations management personnel have reviewed this incident with a representative from each shift.
- c. Operations reviewed Procedure OP/2/A6350/05 for possible enhancement, and determined that with the number of possible variations of alignment, a revision would not be practical and probably would not have prevented this incident from occurring.

4. Corrective steps planned to avoid further violations:

No additional steps are required.

5. The date when full compliance will be achieved:

McGuire is in full compliance at this time.

Example No. 3

Contrary to the above, Removal and Restoration (R&R) procedure 26-616, Tagout for busline 2B, was inadequate in that it did not direct the sequence of steps required to operate the 2B busline Primary Circuit Breakers when the 2B off-site busline was removed from service on June 24, 1988.

These 3 examples constitute a severity level IV (Supplement I) violation and apply to Unit 2.

Reply to Example No. 3:

1. Admission or denial of violation:

The violation is admitted as stated.

2. Reason for the violation if admitted:

Operations staff personnel felt that the generic procedure along with the verbal instructions given with the R&R were sufficient to accomplish the desired alignment; however, this was not the case.

3. Corrective steps which have been taken and results achieved:

- a. Normal off-site power was restored to Unit 2 by 1037 on June 24, 1988.
- b. Operations management personnel have reviewed this incident with a representative from each shift.

4. Corrective steps planned to avoid further violations:

A memo will be written and sent to all Operators emphasizing that the R&R is to allow the removal and restoration of equipment in a specific manner by directing the sequence of the steps involved in repositioning the equipment and indicating the desired removal and return position.

5. Date when full compliance will be achieved:

September 30, 1988

Violation 369,370/88-20-02

- B. Technical Specification 6.2.3.3 requires the Station Safety Review Group maintain surveillance of plant activities to provide independent verification that these activities are performed correctly and that human errors are reduced as much as possible.

Contrary to the above, a review of McGuire Safety Review Group (MSRG) activities covering the period of 1984 through June 1988 revealed that the MSRG did not perform routine independent surveillance of plant operations and maintenance activities to provide independent verification that these activities were performed correctly.

This is a severity level IV (Supplement I) violation and applies to both units.

Reply:

1. Admission or denial of violation:

The violation is admitted in that an insufficient number of independent in-plant reviews/surveillances were performed during the period stated to adequately meet the intent of McGuire Technical Specification requirement 6.2.3.3. However, Duke believed that the requirements were being met through the combined performance of in-plant reviews/surveillances and unusual event investigations.

2. Reason for the violation if admitted:

Duke believed that the requirements were being met through the combined performance of in-plant reviews/surveillances and unusual event investigations.

3. Corrective steps which have been taken and results achieved:

- a. Management has increased the emphasis and the percentage of MSRG time for proactively conducting in-plant reviews.
- b. Management has emphasized to the MSRG to document the conduct of surveillance/programmatic type activities when performed in conjunction with incident investigations, where deemed appropriate.

4. Corrective steps planned to avoid further violations:

- a. Proposed McGuire Technical Specification changes will be submitted to the NRC for approval that will clarify the MSRG functions, responsibilities, and authority.
- b. The SRG Charter will be revised accordingly to be consistent with the proposed Technical Specification wording and issued upon NRC approval of the proposed Technical Specification revision.
- c. Time and resources will be more equitably allocated in the MSRG and to carry out the functions and responsibilities specified in the proposed Technical Specification change and will be periodically monitored.

5. Date when full compliance will be achieved:

- a. The Technical Specification Revision will be submitted upon final review and approval of McGuire management and Duke's Nuclear Safety Review Board.
- b. Upon approval of the proposed Technical Specification revision.
- c. McGuire is in full compliance at this time.

ATTACHMENT NO. 2

DUKE POWER COMPANY  
CATAWBA NUCLEAR STATION  
Reply to Notice of Violation  
Inspection Report 50-413, 414/88-29

Violation 413, 414/88-29-01

Catawba Technical Specification 6.2.3.1 states that 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 and shall make detailed recommendations for revised procedures, equipment modifications, or other means of improving plant safety to the director, Nuclear Safety Review Board.

Contrary to the above, no objective evidence exists that the CSRG reviews NRC issuances, industry advisories, or other sources which may indicate areas for improving plant safety in order to make detailed recommendations for revised procedures, equipment modifications, or other means of improving plant safety.

This is a Severity Level V violation (Supplement I).

Reply:

1. Admission or denial of violation:

The violation is admitted in that an insufficient number of independent in-plant reviews/surveillances were performed during the period stated to adequately meet the intent of Catawba Technical Specification requirement 6.2.3.1. However, Duke believed that the requirements were being met through the combined performance of in-plant reviews/surveillances and unusual event investigations.

2. Reason for the violation if admitted:

Duke believed that the requirements were being met through the combined performance of in-plant reviews/surveillances and unusual event reports.

3. Corrective steps which have been taken and results achieved:

- a. Management has increased the emphasis and the percentage of CSRG time for proactively conducting in-plant reviews.
- b. Management has emphasized to the CSRG to document the conduct of surveillance/programmatic type activities when performed in conjunction with incident investigations, where deemed appropriate.



4. Corrective steps planned to avoid further violations:

- a. Proposed Catawba Technical Specification changes will be submitted to the NRC for approval that will clarify the CSRG functions, responsibilities, and authority.
- b. The SRG charter will be revised accordingly to be consistent with the proposed Technical Specification wording and issued upon NRC approval of the proposed Technical Specification revision.
- c. Time and resources will be more equitably allocated in the CSRG to carry out the functions and responsibilities specified in the proposed Technical Specification changes and will be periodically monitored.

5. Date when full compliance will be achieved:

- a. The Technical Specification Revision will be submitted upon final review and approval of Catawba Management and Duke's Nuclear Safety Review Board.
- b. Upon approval of the proposed Technical Specification revision.
- c. Catawba is in full compliance at this time.