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**DUKE POWER**

September 30, 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/Pd-2.  
Reply to a Notice of Violation

Gentlemen:

Please find attached Duke Power Company's revised response to Severity level IV violation No. 50-413, -414/88-22-01 which was transmitted by V. L. Brownlee's (NRC) letter dated July 8, 1988. This violation was attributed to a misinterpretation of Technical Specifications with regard to the engineering staff.

Very truly yours,

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

Hal B. Tucker

PGI/

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. W. T. Orders  
NRC Resident Inspector  
Catawba Nuclear Station

Handwritten initials "TE01" with a vertical line through them.

BB10130122 880930  
PDR ADOCK 05000413  
G PNU

DUKE POWER COMPANY  
CATAWBA NUCLEAR STATION  
VIOLATION 413, 414/88-22-01

Technical Specification 6.2.2f requires in part that:

Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed Senior Operators, licensed Operators, health physicists, auxiliary operators, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a nominal 40-hour week while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight excluding shift turnover time.
2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Station Manager or his designee, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Contrary to the above, during January and February 1988, personnel exceeded overtime guidelines on numerous occasions without prior approval.

Admission or Denial of the Violation

Duke Power admits the violation.

Reason for the Violation if Admitted

Management misinterpretation of Technical Specification with regard to the engineering staff.

Corrective Steps Which Have Been Taken and the Results Achieved

1. An upcoming revision to an existing Technical Specification Interpretation and a Station Directive will better define the method and intent of controlling overtime as described in Technical Specification 6.2.2.f.
2. Section Head was counselled. He advised his supervisors of the official Technical Specification Interpretation.

Corrective Steps Which Will Be Taken to Avoid Further Violations

With the corrective steps in Section 3 above in place, all further violations will be avoided.

Date When Full Compliance Will Be Achieved

Duke power will complete the revisions to the Station Directive and Technical Specification Interpretation before November 15, 1988.