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June 6, 1988

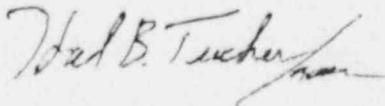
U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Subject: RII/PKV/MSL
Catawba Nuclear Station
Docket Nos. 50-413 and 50-414
IE Report 50-413, -414/88-15

Dear Sir:

Please find attached replies to the Notices of Violation for Violations 414/88-15-06 and 07, which were transmitted by Dr. J. Nelson Grace's letter of May 6, 1988.

Very truly yours,



Hal B. Tucker

PGL/01/bhp

Attachments

xc: Dr. J. Nelson Grace
Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
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
REPLY TO NOTICE OF VIOLATION
414/88-15-06

Evaluation of Equipment Due to Open Sliding Link: A sliding link was discovered open during the performance of ESF Actuation Periodic Test on December 29, 1987. The Train B Bus failed to deenergize and load shed immediately when a degraded voltage was simulated. The cause was determined to be an open sliding link which is normally closed. It was initially concluded that since the breaker involved was for the alternate offsite power source, that the Diesel Generator had been operable. Later it was determined that the B Train had in fact been aligned to offsite power through this breaker during this time and the open sliding link rendered the Train B Diesel Generator inoperable.

RESPONSE:

1. Admission of Denial of Violation:

Duke Power Company admits the Violation.

2. Reasons for the Violation if Admitted:

Catawba Nuclear Station personnel obtain operability evaluations from Duke Power Design Engineering Electrical Division whenever complex electrical control circuitry is involved. Normally, if there is a question of how the plant was aligned (e.g. position of breakers) during an event, Design Engineering either researches that themselves or has station personnel to do so. Design Engineering then furnishes an Operability Statement that concludes with a statement that the equipment/system is operable or inoperable. In this case, the equipment was determined to be operable. However, the possibility that the alternate incoming breaker was in service had not been researched. Compliance personnel did not research the breaker position because they thought Design Engineering had already done so. Station Compliance Personnel assumed that the issue was not whether this alignment had actually occurred, but the ability of the 4160 Volt motors to withstand degraded voltage had this alignment occurred. Therefore, since no inoperability was suspected, this situation was not reported.

3. Corrective Action Take and Results Achieved:

- A. Sliding Link was returned to the correct position.
- B. This Event was reported in LER 414/88-11.
- C. This event was discussed with the person involved and the importance of fully evaluating Operability Statements from out-of-station groups was emphasized.

4. Corrective Actions to be Taken to Avoid Further Deficiencies:

- A. Catawba Nuclear Station now has a staff of Duke Power Design Engineering personnel on site to aid in operability evaluations.
- B. Meetings will be held with Design Engineering Site Staff to discuss proper format and content for operability evaluations.
- C. Corrective Actions taken with regard to the sliding link issue are:
 - 1. Station maintenance Instrumentation and Electrical personnel have surveyed all safety related electrical cabinets for proper positioning of sliding links. Errors found were corrected.
 - 2. A memo was issued by the Plant Manager to all groups involved in the manipulation of sliding links. The memo outlined training and other corrective steps to be taken to correct this situation.

5. Date of Full Compliance:

Full Compliance will be achieved by September 1, 1988.

DUKE POWER COMPANY
REPLY TO NOTICE OF VIOLATION
414/88-15-07

Technical Specification 3.3.3.6 requires that Pressurizer Safety Valve Position Indicator (1/valve) be operable in Modes 1 through 3, with an indicator inoperable, the indicator must be restored to operable status within 48 hours or the unit be in at least Hot Standby (Mode 3) within the next 6 hours and in Hot Shutdown (Mode 4) within the following 6 hours.

Contrary to the above, on February 24, 1988, the licensee failed to place the unit in Hot Standby and subsequently in Hot Shutdown when the Pressurizer Safety Valve Position Indicator had been inoperable for greater than 48 hours.

RESPONSE:

1. Admission or Denial of Violation:

Duke Power Company admits the violation. However, it should be noted that this violation was identified by a conscientious management review of plant conditions. Duke Power Company believes that this violation should more appropriately be classified as a licensee identified violation.

2. Reasons for Violation if Admitted:

The cause of the violation is inadequate documentation available to the operators to clarify the regulatory requirements. While it is generally accepted by the operators that the acoustic monitor is designated to meet the Tech Spec requirements, the following documents did not clearly support that conclusion:

- a. The technical specification identified only a "position indicator" for which the temperature sensor is functionally equivalent to the acoustic monitor.
- b. The surveillance procedure which performs a channel check of the "position indicator" directed the operator to compare the acoustic monitor output to the temperature sensor output without specifying which is designated to satisfy the technical specification.
- c. Neither the acoustic monitor nor the temperature sensor are labeled Post Accident Monitor (PAM) in the control room.
- d. Shift operators erred in determining that the temperature sensor adequately compensated for the inoperable acoustic monitor in that they failed to consult plant management who in turn could have researched applicable licensing submittals (NUREG 0737 response) to assure acceptability.

3. Corrective Actions Taken and Results Achieved:

Upon discovery of the error, action was initiated immediately to comply with the requirements of the specification.

4. Corrective Actions to be Taken to Avoid Further Violation:

a. An intrastation letter has been issued to all Shift Supervisors requiring approval of compensatory actions by station management.

b. The surveillance procedure has been changed to clarify which position indicator is required for compliance with the technical specification.

c. Plant procedures concerning compensatory actions have been revised to require approval of a compensatory action form by the Station Manager, Superintendent of Operations, or the duty manager.

5. Date of Full Compliance:

Duke Power Company is now in full compliance.