

## NOTICE OF VIOLATION

Duke Energy Corporation  
Catawba Nuclear Station

Docket No. 50-413  
License No. NPF-35

During an NRC inspection conducted from November 23, 1997 - January 10, 1998, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

Technical Specification 6.8.1.a requires, in part, that written procedures be established, implemented, and maintained covering the activities recommended in Appendix A to Regulatory Guide 1.33, Revision 2. As referenced in Section 7.e(1), this includes radiation protection procedures for access control to radiation areas including a Radiation Work Permit System.

Procedure SH/O/B/2000/003, Use of the Radiation Work Permit, Revision 00, Step 4.4.1 states that Radiation Work Permit deviations must be documented in a logbook and that changes that extend beyond one shift change must be documented in a revised radiation work permit. Step 4.4.2 requires that a permanent radiation work permit revision be initiated when radiological conditions warrant permanent changes in protective clothing, equipment, or special instructions.

Contrary to the above, between December 14 and December 19, changes to radiological conditions in the 1B residual heat removal pump room were not logged to reflect changes in dress requirements, and the radiation work permit was not revised when the change extended beyond one shift. As a result, workers entered a radiologically controlled area with higher than normal contamination levels without the appropriate dress category for those radiological conditions.

This is a Severity Level IV Violation (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, Duke Energy Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the Catawba facility within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an Order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other

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action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Atlanta, Georgia  
this 9th day of February 1998