

ENCLOSURE 1

NOTICE OF VIOLATION

Duke Power Company  
Catawba 1 & 2

Docket Nos. 50-413 and 50-414  
License Nos. NPF-35 and NPF-52

During the Nuclear Regulatory Commission (NRC) inspection conducted on May 26, through June 25, 1986, violations of NRC requirements were identified. The violations involved multiple examples of inadequate procedures and multiple examples of failure to follow procedures. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violations are listed below:

- A. 10 CFR 50 Appendix B, Criterion V as implemented by Duke Power Company Topical Report Quality Assurance Program, Amendment 9, section 17.2.5 requires that activities affecting quality shall be prescribed by and accomplished with documented instructions, procedures, or drawings and that these procedures include appropriate quantitative acceptance criteria.
1. Contrary to the above, activities affecting quality were not prescribed by documented procedures including appropriate quantitative acceptance criteria, in that, Performance Test (PT) 2/A/4200/02A, Monthly Outside Containment Integrity Verification, performed monthly on Unit 2 to insure that containment penetration integrity is being maintained, did not include approximately twenty-five (25) valves on various penetrations which were required to be included. This inadequate procedure resulted in a violation of Technical Specification (TS) 4.6.1.1.a for Unit 2 which requires these penetrations to be checked at a thirty-one (31) day frequency.
  2. Contrary to the above, activities affecting quality were not prescribed by documented procedures, including appropriate quantitative acceptance criteria in that, PT 2/A/4200/02B, Cold Shutdown Inside Containment Integrity Verification, performed to insure the required conditions of penetrations inside containment on Unit 2 were being maintained in their prescribed positions, did not include twelve (12) valves which were required to be included. This inadequate procedure resulted in a violation of TS 4.6.1.1.a for Unit 2 which requires these penetrations to be verified closed during each Cold Shutdown except that such verification need not be performed more often than once every ninety-two (92) days.
  3. Contrary to the above, activities affecting quality were not prescribed by documented procedures, including appropriate quantitative acceptance criteria in that, PT 1/A/4200/02A, Monthly Outside Containment Integrity Verification performed monthly on Unit 1 to insure that containment penetration integrity is being maintained, did not include one (1) valve which was required to be included. This inadequacy resulted in a violation of TS 4.6.1.1.a for Unit 1.

Collectively, these violations have been evaluated in the aggregate as a Severity Level IV violation (Supplement I).

B. Technical Specification 6.8.1 requires that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A to Regulatory Guide 1.33, Revision 2.

1. Instrumentation Procedure (IP) O/A/3240/11, Excore Nuclear Instrumentation System, step 10.1.6 requires the instrument (IAE) technician to request the Operator at the Controls (OATC) to turn the S/G Program Level Setpoint Indicator Switch to a channel other than the one being adjusted.

Contrary to the above, on June 12, 1986, this step was not performed by the IAE technician while aligning nuclear instrumentation. The failure to perform this step resulted in a reduction of feedwater to the steam generators causing a low-low level in the 1B steam generator and a resultant reactor trip.

2. Station Directive 3.2.2, Development and Conduct of the Periodic Testing Program, Section 8.0 requires that after a valve has undergone maintenance and prior to its return to service, it shall be tested as necessary to demonstrate that the parameters affected by the maintenance are within acceptable limits.

Contrary to the above, 2CF-33, 2CF-60 and 2CF-87 were repaired and returned to service on May 17, 1986, without being tested to demonstrate that the parameters affected were within acceptable limits.

3. Operations Management Procedure (OMP) 2-29, Technical Specifications Logbook Section 3.3.B requires inoperable equipment that causes operation in an ACTION statement for the existing mode shall be logged in the Technical Specification Action Item Logbook (TSAIL).

Contrary to the above, inoperable equipment was not logged in the TSAIL, in that, work requests 31838 OPS, 31841 OPS, 32033 OPS, and 32046 OPS were processed on May 14, 1986, and no log entry made. This contributed to the valves associated with these work requests being returned to service without required functional testing being performed.

4. Mechanical Maintenance Procedure (MMP) 1.0, Work Request Preparation, paragraph 4.3.10 states that the section of the work request entitled "Procedure Numbers" shall reflect a complete listing of procedures used to perform work.

JUL 25 1986

Duke Power Company  
Catawba 1 & 2

3

Docket Nos. 50-413 and 50-414  
License Nos. NPF-35 and NPF-52

Contrary to the above, the "Procedure Numbers" section of the work request identified above did not contain a complete listing of procedures, in that the required procedures for testing after maintenance were not identified. This failure to follow MMP 1.0 contributed to returning the above listed valves to service without the required functional testing being performed.

Collectively, these violations have been evaluated in the aggregate as a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Duke Power Company is hereby required to submit to this Office within thirty (30) days of the date of the letter transmitting this Notice a written statement or explanation in reply including (for each violation): (1) admission or denial of the violation, (2) the reason for the violation if admitted, (3) the corrective steps which have been taken and the results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed by  
Luis A. Reyes

Luis A. Reyes, Acting Director  
Division of Reactor Projects

Dated at Atlanta, Georgia  
this \_\_\_\_ day of \_\_\_\_ 1986