

DUKE POWER COMPANY

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HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

TELEPHONE
(704) 373-4531

February 10, 1987

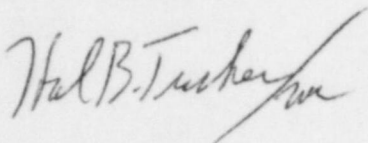
U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Subject: Catawba Nuclear Station
RII/PKV/PHS
50-413/85-48

Dear Sir:

Attached is a revision to our response to Violation 413/85-48-01 which was transmitted by my letter of January 10, 1986. This revision more correctly states our resolve to identify and review specific work items required for restart from cold shutdown.

Very truly yours,



Hal B. Tucker

LTP/10/sbn

Attachment

xc: Dr. J. Nelson Grace, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

NRC Resident Inspector
Catawba Nuclear Station

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DUKE POWER COMPANY
RESPONSE TO VIOLATION
413/85-48-01, Revision 1

Technical Specification (TS) 3.6.5.6 requires that two containment air return systems be operable in Modes 1,2,3, and 4. TS 3.0.4 requires that entry into an Operational Mode or other specified conditions shall not be made unless the conditions for the limiting condition for operation are met without reliance on provisions contained in the action requirements.

Contrary to the above, entry was made into operational Mode 4 and subsequent higher modes on November 13, 1985, with only one containment air return system operable.

RESPONSE:

1. Admission or Denial of Violation
Duke Power Company admits the violation.
2. Reason for Violation if Admitted
The unit was in cold shutdown at the time the air return fan damper was initially suspected to be inoperable (loss of position indication). The shift operator prepared a maintenance work request to investigate the problem, and correctly identified the need to resolve the problem prior to entering Mode 4, Hot Shutdown. The violation occurred due to a deficiency in the handling of work items affecting technical specifications related systems and equipment which are identified and/or worked while the unit is in an operating mode for which the technical specification is not applicable.
3. Corrective Action Taken and Results Achieved
The cause of the inoperable condition (blown control fuse) was corrected within one hour of determination that the damper was in fact inoperable.
4. Corrective Action Taken to Avoid Further Violations
To avoid future violations of TS 3.0.4 a work request priority system which specifically identifies work items which must be completed prior to restart following an outage is being implemented. This priority system, combined with our outage planning and scheduling program, will assure that all maintenance work items both corrective and preventive, which affect technical specifications related systems and equipment will be properly reviewed. A special listing of those items identified as being required for restart will be prepared and reviewed prior to each startup from cold shutdown. Had these programs been in affect earlier, similar violations may have been avoided.

5. Date of Full Compliance
Duke Power Company will be in full compliance by April 1, 1986.