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DUKE POWER

June 15, 1990

Director, Office of Enforcement
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Subject: Catawba Nuclear Station, Units 1 and 2
Docket Nos. 50-413 and 50-414
NRC Inspection Report Nos. 50-413/90-10 and 50-414/90-10
Reply to a Notice of Violation

Gentlemen:

Attached is Duke Power Company's response to the Level III violation cited in the Notice of Violation and Proposed Imposition of Civil Penalty dated May 29, 1990. I admit that the violation occurred, and will submit payment for the civil penalty within 30 days of the date of the Notice.

Duke Power management recognizes the need for stringent plant configuration control during all plant operating Modes. The corrective actions planned to avoid further violations in this area will be fully evaluated for implementation at all of the Duke nuclear stations.

Duke's response to the Level IV violation cited in the same Notice of Violation will be submitted separately.

Violation 90-09-05 in NRC Inspection Report Number 50-413, 50-414/90-09 consisted of two examples of a failure to establish measures to accurately indicate plant configuration. This violation was not cited in the Notice of Violation associated with Inspection Report 90-09, but was identified as an additional example of a violation in Report 90-10. Duke Power's response to violation 90-09-05 will be submitted with the remainder of the violation 90-10 response as requested in the Notice of Violation dated May 10, 1990.

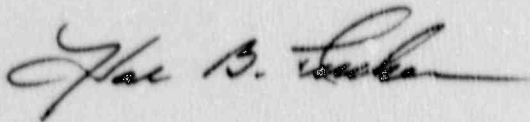
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I declare under penalty of perjury that the statements setforth herein are true and correct to the best of my knowledge.

Very Truly Yours,



Hal B. Tucker

06149001/rgm

Attachment

cc: Mr. Stewart D. Ebner
Regional Administrator, Region II
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Senior NRC Resident Inspector
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DUKE POWER COMPANY
REPLY TO A NOTICE OF VIOLATION
413,414/90-10

10CFR50, Appendix B, Criterion XIV, Inspection, Test and Operating Status, as implemented by Duke Power Company Topical Report Quality Assurance Program, Duke-1-a, requires in part, that measures be established to indicate the status of inspections and tests performed upon individual items of the nuclear power plant. These measures shall provide for the identification of items which have satisfactorily passed required inspections and tests, where necessary to preclude the inadvertent bypassing of such inspections and tests. Measures shall also be established for indicating the operating status of structures, systems, and components of the nuclear power plant, such as by tagging valves and switches, to prevent inadvertent operation.

Contrary to the above:

- A) The licensee failed to establish adequate measures to accurately indicate the operating status of systems and components required to be operable in modes 5 (cold shutdown) and 6 (refueling), and for plant condition changes within modes 5 and 6. On March 20, 1990, a Unit 1 plant condition change was initiated by performing the initial pressurization of the Reactor Coolant System (RCS) in preparation for plant startup while in Mode 5. The current status of the wide range RCS pressure transmitters, a component required to be unisolated for this evolution, was not correctly identified as isolated.
- B) The licensee failed to adequately establish measures to indicate the status of tests performed upon individual items of the nuclear power plant and preclude the inadvertent bypassing of such tests when they are required to support plant condition changes within a mode. Technical Specification 4.4.9.3.1, Analog Channel Operational Test, is required to be performed within 31 days prior to entering a condition requiring Power Operated Relief Valve (PORV) operability. On March 20, 1990, Unit 1 entered a condition which required PORV operability without performing the Analog Channel Operational Test within the prior 31 days. The test had not been performed when originally scheduled, and measures were not implemented to reschedule or prevent the inadvertent bypassing of the test prior to entering a condition requiring PORV operability.

RESPONSE:

1. Admission or Denial of Violation

Duke Power admits the violation.

2. Reasons for Violation if Admitted

Item A. Management had an inadequate method in place for determining equipment status. Therefore, when the review of outstanding work was performed, Reactor Coolant System pressure transmitters were not among components listed as outstanding work.

Item B. The Analog Channel Operational Tests (ACOTs) required for low temperature over pressure protection (LTOP) were not performed prior to the Unit 1 condition change due to the Instrument and Electrical (IAE) group Supervisor failing to follow procedures. Delays in completion of Nuclear Station Modifications (NSMs) and postponement of emergency safety function testing caused delays in performance of the ACOTs as originally scheduled. The IAE Supervisor failed to initiate the appropriate rescheduling form and forward it to the station Planning group so that this work could be rescheduled.

3. Corrective Actions Taken to Avoid Further Violations and Results Achieved

Item A. Instrument root valves were unisolated. Station Management stopped the plant startup until it was determined that the event was fully analysed and necessary immediate corrective actions were taken. Work requests and surveillances were reviewed to ensure equipment operability before proceeding with plant startup.

Item B. ACOTs required for LTOP were completed and the PORV actuation circuits were proven to be in calibration.

Separate Standing Work Requests (SWRs) have been established for performance of LTOP ACOTs during unit outages. This will allow completion of the SWRs to be tied to a specific plant condition change during an outage. The Maintenance

Management Procedure has been revised to clarify responsibilities and flow paths pertaining to SWRs which can not/have not been performed when required. Training has been conducted to ensure compliance with this procedure.

4. Corrective Actions to be Taken to Avoid Further Violations

Item A. The program to assure equipment operability during mode and condition changes was more fully described in station procedures. Procedure signoffs for other groups are being incorporated into the controlling procedures for identified condition changes.
(Operations)

The outage schedule will provide logic for scheduling of Technical Specification plant conditions as identified.
(Integrated Scheduling)

A program will be developed that will clearly identify instruments within the Control Room that are either out of service or known to be out of calibration.
(Operations/IAE)

Item B. Planned actions include revisions to the controlling procedure for unit shutdown such that prior to installing the Reactor Vessel Head, IAE sign-offs must be obtained.
(Operations)

5. Date of Full Compliance

Item A. Duke Power will be in full compliance by 12/31/90.

Item B. Duke Power will be in full compliance prior to duplicate conditions existing during Unit 2 EOC3.

bcc: M. S. Tuckman
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Group File: CN-815.01 (90-10)