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**DUKE POWER**

August 15, 1994

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

Subject: Catawba Nuclear Station  
Dockets Nos. 50-413 and 50-414  
Reply to Notice of Violation  
Inspection Report Nos. 50-413/94-13 and 50-414/94-13

Attached is Duke Power's response to the one (1) Level IV violation cited in the Notice of Violation of Inspection Report 50-413/94-13 and 50-414/94-13.

This violation involved failure to follow procedural directives contained in Nuclear System Directive 703 and CNS Directive 3.0.5.

Very truly yours,

*Mark E. Patrick for*

D. L. Rehn

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DUKE POWER COMPANY  
CATAWBA NUCLEAR STATION  
REPLY TO NOTICE OF VIOLATION  
413,414/94-13-01

Notice of Violation

During an NRC inspection conducted on June 17, 1994, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action," the violation is listed below:

Technical Specification 6.8.1 required, in part, that written procedures be established, implemented and maintained covering applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1978. Regulatory Guide 1.33 listed various safety-related administrative activities including Procedure Review and Approval and Equipment Control.

- A. Nuclear Site Directive 703.7 item 3.h required that "Prior to use, any major change to an Emergency Procedure shall be reviewed by Nuclear Services, Nuclear Engineering Section, Safety Analysis Group. This review may be conducted verbally."

Contrary to the above, on June 17, 1994, a major revision to the Catawba Nuclear Station Emergency Operating Procedures had not been reviewed by the Safety Analysis Group.

- B. Catawba Nuclear Station Directive 3.0.5 Item 6.10 required that labels should use the identical component name and number nomenclature that is used in the station procedures. Item 7.2.1 further required that all process valves up to but not including instrument root valves be uniquely labelled.

Contrary to the above, on June 17, 1994, the following components did not meet the labelling requirements stated above:

- | 1. | <u>Procedure</u>  | <u>Label</u>                           |
|----|---|--|
|    | 1ETA-5 (600v Xfmr 1ETXA Fdr)  | 1ETA#5 4160/600v<br>Transformer 1ETXA  |
|    | 1ETA-16 (600v Xfmr 1ETXC Fdr)   | 1ETA#16 4160/600v<br>Transformer 1ETXC |
|    | 1ETB-5 (600v Xfmr 1ETXB Fdr)  | 1ETA#5 4160/600v<br>Transformer 1ETXB  |
|    | 1ETB-16 (600v Xfmr 1ETXD Fdr)   | 1ETA#16 4160/600v<br>Transformer 1ETXD |
| 2. | VA Filter Bypass Damper Valves - no labels.<br>1SA-6 Main Steam 1C to CAPT Stop Check - no label. |  |

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

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RESPONSE:

1. Reason for Violation

A. As part of Revision 3 to the Nuclear System Directive (NSD) 703, "Administrative Instructions for Station Procedures", the requirement for the Safety Analysis Group (SAG) to review new emergency procedures was eliminated since Catawba Nuclear Station's new emergency procedures are now written to comply with the Owner's Group Emergency Response Guidelines (ERGs). Revision 3 to NSD 703 was effective 02/28/94, and was implemented at Catawba at that time. It was assumed by Operations Procedures Group personnel that this revision had eliminated the requirement for the SAG to review all new issued procedures, as well as procedure changes since they were written to agree with the ERGs. However, during the development of the revision to NSD 703, the need to remove the requirement for the SAG to review procedure changes was overlooked. This requirement should have been removed along with the review requirement of new procedures. The 06/17/94 procedure major change referred to in this example was intentionally not sent to the SAG because it was assumed by the Operations Procedure Group that this requirement had been removed as part of Revision 3 of the NSD.

B. As part of the Emergency Procedure Review Process:

Nomenclature of components in the emergency procedures was compared with the nomenclature of the component to be operated. The current process only requires exact matches when there is a possibility of confusion in identifying the proper component. The verifiers intent was to match the nomenclature. During the process, conformity was inappropriately substituted for exactness.

Useability of each procedure step was checked, it did not specifically require a check for component labeling. However, if a discrepancy was found, the verifiers generated a discrepancy and a request to correct the discrepancy. The locating of steam valves 1SA-3 and then 1SA-6 could have distracted the operators from verifying the correct label; these valves are very easy to identify as they are the only large steam valves in the area. The label had been in place as evidenced by material still attached on the valve yoke. The label may have been in

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place at the time of our nomenclature review. It could not be determined when the label disappeared.

Locating VA Filter Bypass Damper Valves is not required by emergency procedures. There are no local actions an Operator can take at the valve. This would explain why operators did not identify the label as missing.

2. Corrective Actions Taken and Results Achieved

- A. The intent of Revision 3 to NSD 703 was to remove the requirement for the SAG to review all emergency procedures. Following identification of the requirement in paragraph 703.7.3.h, the Operations Procedure Group reviewed the need to require emergency procedure changes to be reviewed by the SAG. It was reaffirmed that it is not necessary for the SAG to review all procedure changes since Catawba's emergency procedures are now in compliance with the ERGs. A change has been initiated to NSD 703 to revise paragraph 703.7.3.h such that this paragraph applies only to Oconee Nuclear Station. Since all emergency procedures are written in accordance with the ERGs, it is not necessary to submit all changes to the SAG for the review in the interim.
- B. Labels have been added to 1SA-6 and VA Filter Bypass Damper Valves.

An Operator Update has been issued re-emphasizing the importance of correct component labeling.

The Problem Investigation Process and Human Performance Enhancement System has identified labeling as a station concern. The site directive has been recently revised and each station group has assigned a labeling coordinator to increase awareness within each group and to resolve concerns. This process is now in place and is considered closed for this report.

3. Corrective Actions to be Taken to Avoid Future Violations

- A. NSD 703 will be revised such that the requirement of paragraph 703.7.3.h is applicable only to Oconee Nuclear Station. This change will be incorporated into the 09/94 revision to the Nuclear Policy Manual.
- B. Administrative procedures will be revised by 11/13/94 to

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require checking labels to ensure they are in place. These procedures will also be revised to ensure procedure nomenclature is identical to label nomenclature found at the location of component to be operated.

An Emergency Procedures review process has been initiated to look for additional labeling deficiencies. If additional deficiencies are identified, all emergency procedures will be reviewed as appropriate. This review and deficiency corrections will be completed by 08/13/95.

Compliance to the requirement in Catawba Nuclear Site Directive 3.0.5, Station Labeling, to provide the noun name on the inplant label, for valves manually operated in emergency procedures and other selected procedures will be completed by 08/13/95.

The importance and responsibilities of plant labeling will be communicated to site groups. This will appear as an article in the next issue of the "Up 'N Atom" which will be issued by 11/13/94.

4. Date of Full Compliance

Duke Power Company is now in full compliance.