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**DUKE POWER**

July 26, 1991

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, 414  
NRC Inspection Report Nos. 50-413, 414/91-13  
Violation 50-413, 413/91-13-01  
Reply to a Notice of Violation

Enclosed is the response to the Notice of Violation issued June 26, 1991 by Luis A. Reyes concerning inadequate and/or failure to follow procedures resulting in configuration control problems.

Very truly yours,

*M. S. Tuckman*  
M. S. Tuckman

Attachment

cc. Mr. S. D. Ebner  
Regional Administrator, Region II

Mr. W. T. Orders  
Senior Resident Inspector

Mr. R. E. Martin, ONRR

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Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained covering the activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, including the operation and maintenance of plant systems and components.

Contrary to the above:

- A. On May 5, 1991, during fuel movement, the control room was contacted about conveying ice. Approval was given to convey ice and draw air out of containment. The ice machine operator was unaware fuel movement had started. During the performance of this work, T/S 3.9.4 was violated due to drawing suction through penetration M-371 during fuel movement.
- B. On April 20, 1991, 1RN-236 was discovered to be closed during D/G 1A break-in run and testing.
- C. On May 10, 1991, Unit 2 was in 3.0.3 for 13 minutes due to 2A and 2B Filter Exhaust Fans tagged at the same time for maintenance.
- D. On May 22, 1991, loss of boration flow path required by T/S 3/4.1.2 due to no emergency power to operable NV pump when making 1A D/G inoperable for testing.
- E. On May 27, 1991, load center 1LXN was found de-energized.

**RESPONSE:**

**1. Reasons for Violation**

- A. The ice machine operator did not use the Ice Making and Charging system procedure.
- B. The transferring of information from the Work Requests to the R&R sheet overlooked placing 1RN-236 on the R&R sheet.
- C. The operators inadvertently tagged a component in the operable train of Auxiliary Building Filtered Exhaust. This was a result of an inadequate review of the tagout.
- D. The SRO administratively removing the D/G from service failed to follow the initial conditions of the operating procedure.

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- E. The supervisor, determining restoration position for 1LXN feeder breakers, failed to properly identify restoration position for load center.

**2. Corrective Actions Taken and the Results Achieved**

- A. The need to use procedure OP/0/B/6200/16 in ice blowing activities has been emphasized to the Shift Supervisors of ice blowing crews.
- B. This is considered to be an isolated incident, of inattention to detail. This was evaluated by an Operation's committee and direct programmatic changes were not determined to be necessary, though some enhancements are being made to R&R forms and procedures.
- C. The Shift Supervisor immediately dispatched an NLO to remove tags from VA fan motor ABFXF-2B.  
  
This event was discussed with personnel involved.
- D. This event was discussed in detail at the Shift Supervisor's Meeting July 8, 1991.  
  
The individual involved with the incident was counselled.
- E. An Operator update was issued to Operations personnel. It described the event and stated for future tagouts that breakers specified will be identified as being required to be closed or open.

**3. Corrective Actions to be Taken to Avoid Further Violations**

- A. The Ice Making and Charging System procedure will be revised to ensure that CROs and ice machine operators review existing unit conditions and their affects, prior to each initiation of ice blowing. The procedure will be revised to include acknowledgement by CROs of the penetrations to be used in each ice blowing evolution.

The importance of not using penetration M-371 during ice blowing activities

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while core alterations are in progress, will be included in the Refueling Outage Briefing Package for applicable Operation's personnel.

All ice handlers will be required to be qualified to the Operations Training and Qualification Guide on proper use of procedures per OMP 1-4, Use of Procedures.

- B. Operations will evaluate formalizing a philosophy of valve verification following tagouts.

Training associated with the implementation of modified R&R Sheets will convey the need for tailgate meetings and any changes to the philosophy of valve verification.

- C. An Operations committee is reviewing all preplanned tagouts for the VA system. This committee will provide recommendations and changes if needed.

Operators during requalification and the hot license class will receive operator proficiency training concerning this incident.

- D. No further actions specific to this incident are planned.

- E. The Tagout Removal and Restoration (R&R) Procedure will be changed to require specifying a breaker position upon restoration.

Training will be conducted on changes to the R&R Procedure.

**4. Date of Full Compliance**

Duke Power is now in full compliance.