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July 14, 1983

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Ms. E. G. Adensam, Chief
Licensing Branch No. 4

Re: Catawba Nuclear Station
Docket Nos. 50-413 and 50-414

Dear Mr. Denton:

Elinor G. Adensam's letter of June 21, 1983 transmitted the Staff's licensing position on Catawba Safety Evaluation Report Open Item 10, Lockout of Manual Control by the Load Sequencer. Attached is Duke's proposed resolution for this item.

Very truly yours,

Hal B. Tucker

Hal B. Tucker

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Attachment

cc: Mr. James P. O'Reilly
Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
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NRC Resident Inspector
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CATAWBA NUCLEAR STATION

LOCKOUT OF MANUAL CONTROL BY THE LOAD SEQUENCER

(OPEN ITEM NO. 10)

As previously discussed with the staff, the present design of the Catawba Diesel Generator Load Sequencer has many positive advantages.

The design does not introduce a new manual control lockout until after reset philosophy but merely endorses and extends the design philosophy of the Solid State Protection System (SSPS).

The precluding of manual actions until after SSPS reset is typical for Westinghouse plants. Since this philosophy is employed for air operated valves, motor operated valves and 600 volt motors which have no sequencer interface, it is good human factors practice to provide consistency by extending this reset philosophy to sequencer controlled loads.

This practice includes a "stop and think" feature (resetting of the SSPS) which helps to insure that assumption of manual control by the operator is a planned, conscious, deliberate action. This reduces the potential for inadvertent or erroneous actions especially in the first few critical minutes of an accident.

The staff has expressed concern that a failure could occur which would prevent the resetting of a sequencer and thus inhibit subsequent manual control by the operator. (Note that such a postulated failure would only affect one of the redundant sequencers thus the remaining train would be fully capable of fulfilling all safety functions).

In the unlikely event of such a failure, the operator can regain manual control of sequencer loads by simply tripping a single breaker to remove control power from the sequencer. The appropriate station procedures will be revised to provide the operator with the specific guidance as to when and how this action should be taken.

By implementing this resolution the positive aspects of the present sequencer design can be preserved while also providing a simple,straightforward recovery method for the operators should a failure to reset occur.