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**DUKE POWER**

November 28, 1994

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

Subject: Catawba Nuclear Station  
Dockets 50-413 and 50-414  
Reply to Notice of Violation  
Inspection Report 50-413/94-20 and 50-414/94-20

Attached is Duke Power Company's response to the one (1) Level IV violation cited in the Notice of Violation (NOV) of Inspection Report 50-413/94-20 and 50-414/94-20, dated November 1, 1994. This violation was identified regarding failure to perform operator competency evaluation.

If you have any questions concerning this response, contact Kay Nicholson at 803-831-3237.

Sincerely,

A handwritten signature in dark ink, appearing to read 'DL Rehn'.

D. L. Rehn

\KEN:RESP94.20

xc: S. D. Ebnetter, Regional Administrator

R. E. Martin, ONRR

R. J. Freudenberger, SRI

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**DUKE POWER COMPANY  
CATAWBA NUCLEAR STATION  
REPLY TO NOTICE OF VIOLATION  
413, 414/94-20-03**

**Notice of Violation**

During an NRC inspection conducted during the period September 26-October 7, 1994, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

10 CFR 54 (i-1) states, in part, "...the licensee shall have in effect an operator regualification program which must as a minimum, meet the requirements §55.59 of this chapter. Notwithstanding the provisions of §50.59, the licensee may not except as specifically authorized by the Commission decrease the scope of an approved operator regualification program.:

10 CFR 55.59(4) states, in part, "The regualification program must include - (i) Comprehensive regualification...annual operating tests which determine areas in which retraining is needed to upgrade licensed operator and senior operator knowledge. ...(iii) Systematic observation and evaluation of the performance and competency of licensed operators and senior operators...during actual or simulated abnormal and emergency procedures."

10 CFR 55.59(c)(5) states, in part, "The regualification program documentation must include the following: (1) The facility licensee shall maintain records documenting the participation of each licensed operator and senior operator in the regualification program. The records must contain copies...of the results of evaluations and documentation of operating tests and of any additional training administered in areas in which an operator or senior operator exhibited deficiencies. The facility licensee shall retain these records until the operator's or senior operator's license is renewed."

Contrary to the above, on October 5, 1994, the NRC identified that, during the Catawba 1994 comprehensive regualification annual operating tests, systematic evaluations of individual licensed operator and senior operator performance and competency during actual or simulated abnormal and emergency procedures were not conducted and consequently not retained.

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

**DUKE POWER COMPANY  
CATAWBA NUCLEAR STATION  
REPLY TO NOTICE OF VIOLATION  
413, 414/94-20-03**

**RESPONSE:**

**1. Reason for Violation**

Catawba Operations Training misinterpreted the change to ES-604, "Dynamic Simulator Regualification Examination" requiring the evaluation of crews to "critical tasks" versus individual "critical tasks" when Revision 7 of NUREG - 1021 was issued. All crews were evaluated based on crew performance of "critical tasks" and a crew competency evaluation. Individual performance was monitored; however, individual performance was not documented using individual competency evaluations. Catawba Operations Training interpreted the guideline to only require an individual evaluation if an individual demonstrated a significant deficiency related to a "critical task".

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

Operations Training has developed and included individual competency sheets for Reactor Operators and Senior Reactor Operators into the operating examination administration guideline.

Additional guidance has been added to the examination guideline to require individual competency evaluations during the annual operating examination and evaluated simulator sessions.

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

The use of the individual competency forms will be implemented January 1, 1995 by Operations Training.  
[Assigned to OPT]

**4. Date of Full Compliance**

Duke Power Company is now in full compliance.