

DUKE POWER COMPANY

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February 7, 1984

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:

On June 1, 1983 Duke Power submitted the Catawba Unit 1 Control Room Review Supplemental Report. This report described the human engineering discrepancies (HED) identified during the review and provided a schedule for implementation of HED solutions. This schedule was discussed at the conclusion of the NRC Staff's August 9-12, 1983 audit of the Catawba Unit 1 Detailed Control Room Design Review (DCRDR). Following this audit we have updated the implementation schedule for HED solutions to be completed by the end of the first refueling outage as reflected in the attached changes to Duke Power's Response to Supplement 1 to NUREG-0737.

This schedule was developed during an extensive review of the HED solutions recommended for implementation. Following the requirements of Supplement 1 to NUREG-0737, this review carefully considered the significance of each HED, including the contribution of the HED solution to the reduction of risk and enhancement in the safety of operation, the difficulty of installing the HED solutions, the need for rewriting operating procedures and for retraining, and the coordination of HED solution changes with changes resulting from other improvement programs such as the SPDS, operator training, new instrumentation (Reg. Guide 1.97, Rev. 2), and upgraded emergency procedures.

The integration of all of the changes resulting from these improvement efforts is a complex and demanding scheduling effort which requires cognizance of the interrelationships between each of the improvement areas, operator training requirements, and the plant status required for the implementation of each change. Recognizing that some changes can be installed while the unit is on-line, and that many changes must be installed only after a preceeding change has been completed, the individual HED solutions must be carefully coordinated to avoid the introduction of additional human engineering deficiencies.

The submittal schedule was developed after consideration of the significance; the difficulty of installing the HED solution, including installation time, design/engineering time, and material procurement, the plant status necessary for installation; and the coordination between HED solution changes, and the

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integration of these changes with changes from the other improvement activities. The schedule used two defined dates, fuel load and first refueling, as commitment milestones. These milestones are not installation dates, but are completion dates. HED solutions will be installed on a continuing basis either on line, if possible, or during an appropriate outage encountered during this start-up and fine-tuning period. The HED solution schedule was also divided into physical and surface enhancement type solutions. Physical modifications involve control board fabrication and device wiring. Surface enhancement modifications scheduled for outages between fuel load and the first refueling involve nameplates, meter scales, and escutcheon changes that need to be coordinated with other physical modifications and/or may require the unwiring and dismantling of individual devices.

After reviewing the HED solutions scheduled for implementation during the period between fuel load and the end of the first refueling outage, we are confident that at least 20 percent of these solutions can be installed within 12 months from fuel load. During this 12 months and the remaining time before the end of the first refueling outage, the remaining HED solutions will be installed on a continuing basis as outage schedules permit, with all solutions completed by the end of the refueling outage.

Very truly yours,

Hal B. Tucker / HBT

Hal B. Tucker

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Attachment

cc: Mr. James P. O'Reilly, Regional Administrator
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NRC Resident Inspector
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cc: Mr. Jesse L. Riley
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Catawba Nuclear Station
Response to Supplement 1
To NUREG - 0737

The following corrections should be made to Appendix D, Implementation Priority Schedule:

- (a) Section I (Physical Changes)
 - Delete HED, 6, 14, 52
- (b) Section I (Surface Enhancements)
 - Add (P) for partial implementation to HEDS 367, 400, 405, 408
- (c) Section II (Physical Changes)
 - Delete HED 429A (this HED is listed under Appendix C, HEDs Not Corrected)
 - Add HED 457
- (d) Section II (Surface Enhancements)
 - Delete HED 242 (this HED is covered by HED 80)
 - Correct HED 238 between HEDs 341 and 361 to be HED 348
 - Add HEDs 367(P), 400(P), 405(P), and 408(P)

I. HED Solutions to be completed prior to fuel loading.

Physical Changes

5
18
22
28
53
73
74
77
78
86
120
114
424A

Surface Enhancements

2
13
36
51
83
87
91
98
244
304
307
325
327
361 (P)
367 (P)
395 (P)
399
400 (P)
405 (P)
408 (P)
464
467 (P)
482 (P)

(P) Partial implementation before fuel load, partial implementation after fuel load.

II. HED Solutions to be completed by the end of the first refueling.

Physical Changes

8	88	274	359	424H
9	89	283A	366	426
10	92	283E	371A	429B
19	102	301	392B	429C
30	104	324	416	430
42	105	332	422A	437
43	108	343	422B	457
45	113	344	422D	468
48	124	345	422E	469
58	125	350	422F	470B
59	202	352	422G	490
60	250	353	422H	505
64	251	354	424B	512
68	253	355	424C	526
72	254	357	424F	532
79	273	358	424G	584

Surface Enhancements

32	214	363	392A	446
41	215	367 (P)	395 (P)	463
46	219	368	400 (P)	467 (P)
80	235	369	402	472 (P)
84	238	374	403	495
117	241	378	405 (P)	509
119	255	379	406	522
204	256	381	408 (P)	525
206	282	382	411	534
207	338	387	413	594
208	341	390	415	
211	348	391	417	
	361 (P)		423	

(P) Partial implementation before fuel load, partial implementation after fuel load.