

DUKE POWER COMPANY

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HAL B. TUCKER

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NUCLEAR PRODUCTION

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03 NOV 10 10:24
November 4, 1983

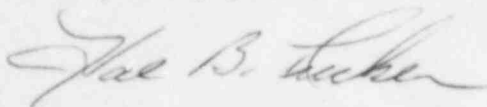
Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30303

Re: RII:PKV,PHS
50-413/83-26

Dear Mr. O'Reilly:

Please find attached a response to Violation No. 413/83-26-01 as identified in the above referenced inspection report. Duke Power Company does not consider any information contained in this inspection report to be proprietary.

Very truly yours,



Hal B. Tucker

LTP/php

Attachment

cc: NRC Resident Inspector
Catawba Nuclear Station

Mr. Robert Guild, Esq.
Attorney-at-Law
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Charleston, South Carolina 29412

Palmetto Alliance
2135½ Devine Street
Columbia, South Carolina 29205

Duke Power Company
Catawba Nuclear Station

Violation:

10 CFR 50, Appendix B Criterion XVII and the accepted QA Program (DUKE-1A) Section 17.2.17 requires sufficient records shall be maintained to furnish evidence of activities affecting quality and that these records shall include testing.

Contrary to the above, records have not been maintained to provide evidence that all testing required to be performed has been accomplished on the Upper Head Injection Testing (TP/1/A/1200/033). This test was completed and the results approved by required management personnel certifying all data was acceptable on October 22, 1982. A review of the completed test on July 26, 1983 (record copy) identified four pages of data required to be taken were missing from the document control system.

Response:

1. Duke admits the violation as stated.
2. The reason the violation occurred is that the existing Guidelines and Directives did not provide sufficient direction to individuals handling completed procedures on their responsibility for ensuring completeness.
3. The corrective steps which have been taken are:
 - a. TP/1/A/1200/03B, UHI Functional Test. The completed procedure package for this test (approved October 22, 1982) has been reviewed and the impact of the missing data sheets has been evaluated.
 1. Enclosure 13.2, Electrical Alignment: the completed copy of this enclosure has not been located. An evaluation has been performed of the consequences of mispositioning of any of these breakers (see Attachment). Based upon this evaluation, the loss of this checklist does not compromise the results of the test. More importantly, the completion of the enclosure was verified by the test coordinator under Step 8.1. This documents the fact that the breakers were properly positioned prior to beginning the test. No further action will be taken on this item.
 2. Enclosure 13.3, HIV Manual Operation: the completed copy of this enclosure has not been located. Verification of the manual stroke times will be documented by a retest of the valves.

3. Enclosure 13.4, iiV Automatic Mode Verification: the completed copy of this enclosure has not been located. The documentation of alarms is not required since this was deleted by procedure change #3. The valve closure times will be verified by a retest.
 4. Enclosure 13.9, High Pressure Blowdown: an investigation has revealed that Page 2 of this enclosure never existed. The heading "Page 1 of 2" was a typographical error. Since this is the case, no data pertaining to the high pressure blowdown portion of the test were lost and the test results are valid as they stand. No further action will be taken on this item.
 5. All required retests will be complete prior to Unit 1 fuel loading.
- b. A review of all completed preoperational test procedures was performed August 2, 1983 through September 16, 1983. While several minor typographical and administrative discrepancies were identified, nothing was discovered which would compromise the validity of the completed tests.
- c. Administrative controls for handling and checking completed test procedures have been improved as follows:
1. In Document Control, one person is now assigned to handle, receive, issue, and file procedures.
 2. Procedures cannot be checked out of Document Control once received. Copies can be made only if the Document Control Clerk accompanies the procedure.
 3. A log is now kept in Document Control of all persons who view completed procedure files with name, date, name of file reviewed, and any additions or deletions made to file.
 4. All completed procedures transmitted to Document Control are now verified complete and this is documented by initials on the transmittal sheet.
 5. Document Control personnel now have individuals submitting completed procedures check them for completeness. Document Control personnel count pages submitted and enter the number of pages on the Document Control Transmittal Sheet.
 6. New procedures submitted are microfilmed as soon as possible after receipt. The microfilm is placed in jackets for better storage and retrieval.
 7. These new Administrative Controls went into effect August 5, 1983. The Station Directive describing Document Control activities will be revised to reflect these changes by November 15, 1983.

4. The corrective actions listed above should be sufficient to prevent further violations. No additional actions are contemplated.
5. Full compliance will be achieved by Unit 1 fuel loading now scheduled for May 1984.

ATTACHMENT

Evaluation of Enclosure 13.2: TP/1/A/1200/03B

I.	UHI Check Valve Test Line Isol	1NI258A	1EMXA/R08C	Closed
		1NI264B	1EMXJ/R07B	Closed
		1NI266A	1EMXK/F01A	Closed
		1NI267A	1EMXK/F09B	Closed
		1NI255B	1EMXJ/R06B	Closed

The above breakers were to be closed to allow isolation of the test headers. These headers are not part of the main blowdown path and the valves were verified closed in Enclosure 13.1 Valve Checklist.

II.	UHI Accum. Isol Valve	1NI243A Gag	1EMXK/F08C	Closed
		1NI245A Gag	1EMXK/F08D	Closed
		1NI242B Gag	1EMXL/F08C	Closed
		1NI244B Gag	1EMXL/F08D	Closed

The above breakers were to be closed prior to Section 12.1. Gag valve operation for all four gags was verified in Section 12.2. Therefore, breakers had to be closed.

III. UHI Hydraulic Pump 1MXY/F05E closed. The pump was operated under all modes of operation. Therefore, breaker had to be closed.

IV. UHI Makeup and Testing Pump 1MXY/F05D open. Pump not used during testing.

V.	UHI Accum. Isol Valve	1NI243A Control	1ERPA/#3	Closed
		1NI245A Control	1ERPA/#3	Closed
		1NI242B Control	1ERPD/#3	Closed
		1NI244B Control	1ERPD/#3	Closed

Control power had to be energized for proper operation of hydraulic valve solenoids throughout the test. Valve operation verified in Section 12.2 and 12.3.

VI. UHI Hydraulic Selector Valve 1KPM/#15 closed.

Breaker energizes solenoid needed for manual operation of hydraulic gate valves. Manual operation verified in Section 12.2; therefore, breaker had to be closed.

VII. 1NI237 Fill Line Isol 1CDB/F02E Closed
1NI234 Fill Line Isol 1CDB/F02E Closed
1NI283 N₂ Accum Vent Isol 1CDA/F02E Closed
1NI286 N₂ Accum Fill Isol 1CDA/F02E Closed
1NI270 Surge Tank Drain 1CDA/F02E Closed
1NI271 Surge Tank Drain 1CDA/F02E Closed

Breakers energized to perform valve alignment only. Valve alignment verified in Enclosure 13.1, Valve Checklist. Breakers have no effect on valve operation or blowdown testing.