

DUKE POWER COMPANY

P.O. BOX 33189  
CHARLOTTE, N.C. 28242

HAL B. TUCKER  
VICE PRESIDENT  
NUCLEAR PRODUCTION

TELEPHONE  
(704) 373-4531

January 27, 1984

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:NE  
50-413/83-48

Dear Mr. O'Reilly:

Please find attached a response to Violation No. 413/83-48-01 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*  
Hal B. Tucker *EB*

LTP/php

Attachment

cc: NRC Resident Inspector  
Catawba Nuclear Station

Mr. Robert Guild, Esq.  
Attorney-at-Law  
P. O. Box 12097  
Charleston, South Carolina 29412

Palmetto Alliance  
2135½ Devine Street  
Columbia, South Carolina 29205

8403160216 840305  
PDR ADOCK 05000413  
Q PDR

CATAWBA NUCLEAR STATION  
Response to Violation  
No. 50-413/83-48-01

Violation:

10 CFR 50, Appendix B Criterion V and the accepted QA Program, Duke 1A section 17.2.5 requires instructions, procedures or drawing shall include appropriate quantitative or qualitative criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, the requirement to provide appropriate quantitative or qualitative acceptance criteria was not met. Several preoperational test procedures were being performed during hot functional testing with inadequate acceptance criteria. For example, acceptance criteria statements in TP/1/A/1200/05, Chemical and Volume Control System Functional Test and TP/1/A/1600/08, Pressurizer Dynamic Functional Test were as follows:

1. Pressurizer pressure setpoint for reactor trip at approximately 2385 psig
2. Safety injection low pressurizer pressure alarm at approximately 1845 psig.
3. Letdown high flow alarm actuates properly
4. Excessive letdown heat exchanger is operating properly.

These statements are considered imprecise and prevent proper evaluation of the test results.

Response:

1. Duke denies the violation as stated.
2. Duke Power Company believes that the violation is incorrect as stated. The procedures referenced in the notice did contain acceptance criteria statements which contained quantitative and qualitative guidance to allow determination of acceptable operation of the systems involved. The statements were in keeping with the requirements cited in 10 CFR 50, Appendix B Criterion V and QA Program, Duke 1A Section 17.2.5 and with previous industry practice. Duke Power Company therefore does not believe that the existence of these criteria in the procedures in use at the Catawba Nuclear Station constitutes a violation of the regulations as stated.
3. While Duke Power Company disagrees with the classification of this finding as a violation, Duke Power Company recognizes the fact that the phrasing of these acceptance criteria statements represents a deficiency which should be eliminated so as to strengthen the preoperational test procedures at the Catawba Nuclear Station:

Response (Cont'd):

- (1) A review will be conducted of acceptance criteria statements in all preoperational test procedures for which testing activities have been previously conducted. This review will incorporate guidelines for ensuring that quantitative acceptance criteria incorporate numerical bounds or ranges of acceptability, and that qualitative acceptance criteria clearly and specifically indicate the basis for acceptable test performance. Where the review identifies acceptance criteria statements which do not fully meet these review guidelines, the specific test data will be evaluated against a revised acceptance criteria statement which is in accordance with the guidelines and the results of this evaluation will be documented as to test acceptability.
  - (2) Guidelines which require more specific quantitative acceptance criteria incorporating bounds of acceptability of a parameter, or more specific qualitative acceptance criteria which clearly indicate the basis for test acceptance, will be used to ensure that procedures used for future testing activities will contain stronger, more specific acceptance criteria statements.
4. Duke Power Company feels that the review outlined in item 3(1) above and the strengthening of the acceptance criteria statements in future preoperational tests as stated in item 3(2), will provide additional assurance that the preoperational testing program at Catawba Nuclear Station is sound and that the acceptability of the systems and components subject to testing has been fully verified.
  5. It is anticipated that the actions detailed above will be completed or fully in place by April 1, 1984.