

DUKE POWER COMPANY

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HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

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June 8, 1984

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Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Re: RII:NE
50-413/84-44
50-414/84-21

Dear Mr. O'Reilly:

Please find attached a response to Violation No. 413/84-44-01, 414/84-21-01 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,

H.B. Tucker / HBT
Hal B. Tucker

LTP/php

Attachment

cc: NRC Resident Inspector
Catawba Nuclear Station

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Response to NRC Violation
413/84-44-01
414/84-21-01

Violation - Part 1:

1. Duke Power admits Part 1 of the violation.
2. Cause of Part 1 of Violation:

The cause of the above violation was miscommunication between Design Engineering and Construction in identifying storage and maintenance requirements on applicable form 302.2. A review of the procurement documentation found requisition No. 1201.05-6 addendum 2 dated January 20, 1976 which updated the storage requirements per the attached form 302.2. This form documents storage requirements per ANSI 45.2.2-72, Level C with special requirements of "Caps and Plugs (all openings)." Addendum 2 of requisition 1201.05-6 was the last revision released prior to shipment of the pumps. A review of the vendor instruction manual revealed no special storage requirements specified by the manufacturer. Catawba Construction's understanding has always been that all special storage requirements, including ANSI 45.2.2-72 requirements, are listed by Design Engineering on form 302.2 and/or vendor manuals. For this reason, Mechanical Technical Support (Construction) did not issue form P-3A, which would have implemented the Construction storage and maintenance program on the component cooling pumps. Design Engineering's understanding has been that ANSI 45.2.2-72 requirements would be implemented by assigning the storage level classification and that special storage requirements specified additional requirements.

3. Corrective Action:

Non-Conforming Item Report No. 18,430 was originated to document the breakdown of the storage and maintenance procedures and to evaluate the need for corrective action. Evaluation of this NCI determined that, for the Unit 1 pumps, no corrective action is required. Shaft alignment inspections and vibration monitoring, and functional testing, done by Construction and Nuclear Production would have found any damage incurred because of the lack of periodic shaft rotation. Form 302.2 will be reviewed and updated, and a form P-3A issued for the Unit 2 pumps. The same tests and inspections, as Unit 1, will be performed on the Unit 2 pumps.

4. Corrective Action to Avoid Further Violations:

Action was assigned on R-5A No. 623 for Mechanical Technical Support to notify Design Engineering by letter, to review form 302.2 and provide more detailed and thorough information where necessary. Action was assigned on R-6A No. 670 for Mechanical Maintenance to evaluate all equipment not transferred to Nuclear Production, to verify that P-3As have form 302.2 requirements correctly specified including requirements of ANSI 45.2.2-72.

5. Status:

Form 302.2 has been revised (Revision 5) so that all storage requirements, installed and pre-installation, have to be listed. Reference to the ANSI 45.2.2-72 storage level classification has been removed and is only shown on the requisition form.

All other corrective actions shall be implemented and completed by October 1, 1984.

Violation - Part 2:

Form P-3A used to document storage/maintenance inspections on the Hydrogen Recombiner showed the last inspection was performed on July 11, 1983. The licensee could produce no objective evidence that the required monthly storage inspections were performed beyond the aforementioned date.

References:

- (a) Administrative Policy Manual for Nuclear Stations, Duke Power Company
- (b) ANSI/ASME N45.2.2-1978
- (c) ANS-3.2/ANSI N18.7-1976
- (d) Catalytic Hydrogen Recombiner Technical Manual for SPIN DCP-GHRECA-01
- (e) Maintenance Management Procedure 3.0 Rev. 9
- (f) Nuclear Maintenance Data Base Program for WG-Waste Gas System
- (g) Form S-2, Supplemental for Provisional Turnover

Response:

1. Duke Power denies this part of the violation. The Hydrogen Recombiner was accepted by Nuclear Production as a provisional turnover in accordance with reference (a) on July 8, 1983. This turnover from Construction removed the recombiner from storage (reference (b), Section 6); therefore, storage requirements were no longer required. The entire Waste Gas System (WG), including the recombiner, will be evaluated for the Preventive Maintenance Program in accordance with reference (c), Section 5.2.7.1, reference (d), Section 6.2, and reference (e).

These references are available for review at the station.