DUKE POWER COMPANY
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VICE PRESIDENT
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April 6, 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:PKV/PHS
50-413/83-56
50-414/83-42

Dear Mr. O'Reilly:

Please find attached responses to Violation No. 413/83-56-04 and Violation No. 413/83-56-06, 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

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

JPO/HBT/LTP
April 6, 1984

DUKE POWER COMPANY
CATAWBA NUCLEAR STATION

VIOLATION:

10CFR50, Appendix B, Criterion XI and the Duke Power Company QA Topical Report, "Quality Assurance Program", Duke-1-A (Amendment 6), Section 17.2.11, requires that test results be evaluated to assure that test requirements have been satisfied.

Contrary to the above, the licensee did not adequately evaluate the test results of procedure TP/1/A/1250/05, Main Steam Safety Valve Setpoint Test, in that the data sheets for valves 1SV6, 1SV9, 1SV20, 1SV21, and 1SV23 were found to have setpoint errors. Analysis of data recorded for valve 1SV21 indicated that the valve failed to lift within the acceptable tolerance range.

RESPONSE:

(1) Duke admits the violation as stated.

(2) The reason the violation occurred was because math errors, made in the field during the testing of the main steam safety valves, were not discovered or corrected during the final review of the completed procedure.

In response to the violation concerning valve 1SV21, where the analysis of recorded data indicated that the valve failed to lift within the acceptable tolerance range, it is agreed that if the hydroset pressure recorded for test 2 was used, the valve would be out of its acceptable range. This was the case when the second lift was performed.

The data sheets were only intended to incorporate the final three consecutive lifts within the acceptable range. This valve (1SV21) required five tests to achieve the three consecutive lifts in tolerance. When the first test was performed, the lift was within the acceptable range and recorded on the data sheet. After the second test was recorded on the data sheet and set pressure calculated, it was discovered that the valve had lifted out of the acceptable range. Because of this, the data recorded for test 1 and test 2 had to be crossed out. The recorded hydroset pressure was mistakenly not crossed out since it stands alone on the right side of the data sheet. After a valve adjustment, three consecutive lifts were made within the acceptable range. These setpoints were recorded on the data sheets with the corresponding differential pressure and system pressure. But since the earlier recorded hydroset pressure had not been crossed out, the new recorded differential pressure did not correlate with the recorded hydroset pressure.

(3) A thorough review was made on the completed test procedure TP/1/A/1250/05. The errors cited in this violation were corrected and documented per procedure change three (3). The Dresser service engineer's test report and data sheets were attached to the procedure change to verify the set pressure for 1SV21.

Greater emphasis has been placed on the thoroughness required of each completed test procedure review.

(4) A change in the procedure format for testing main steam safety valves will be made to include every lift performed instead of just the final three. This will eliminate the possibility of errors caused by transposing data from notebook paper to the procedure data sheet. It is also intended to eliminate any confusion created by having to cross out any recorded data not within the acceptable range.

(5) Full compliance has been achieved involving this specific test. Future test procedures that involve the testing of main steam safety valves shall have modifications added to their data sheets to incorporate every lift performed on each valve. This modification to the data sheets will be done before the first refueling outage of Unit One or before Hot Functional Testing of Unit Two, whichever comes first.

DUKE POWER COMPANY
CATAWBA NUCLEAR STATION

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VIOLATION:

Materials License No. SNM-1920 authorizes use of licensed material in accordance with the conditions specified in the licensee's application dated November 22, 1983. The Facilities and Equipment Section, Paragraph A.5 of the licensee's application requires, in part, the performance of seven tests prior to initial fuel receipt.

Contrary to the above, the licensee did not implement all test requirements contained in the application for a materials license in that procedure TP/1/B/1450/15, Fuel Pool Ventilation System Functional Test had not been completed prior to initial fuel receipt. As of January 17, 1984, steps 7.2, 7.3 12.5, 12.6, 12.11 and 12.12 of the procedure had not been performed: the first shipment of fuel was received on January 4, 1984, and placed in the new fuel storage area.

RESPONSE:

1. The violation occurred as stated.

2. The violation occurred because the personnel responsible for the completion of TP/1/B/1450/15 Fuel Pool Ventilation System Functional Test were not adequately informed that the license application required completion of the test before fuel was received.

3. Although the license requires that TP/1/B/1450/15 be complete prior to receiving fuel, there is no technical basis that would require that TP/1/B/1450/15 be complete in order to protect the health and safety of the public and integrity of the new fuel. The fuel pool ventilation system is designed to prevent release of radioactive materials in the case of a spent fuel handling accident.

   We currently plan to complete the test prior to Unit #1 fuel loading.

4. The license application has been reviewed to detect other areas where items which should have been completed prior to fuel receipt, may not have been completed. No further problems were found.

5. The test TP/1/B/1450/15 will be completed prior to Unit #1 fuel loading.