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**DUKE POWER**

August 31, 1995

U. S. Nuclear Regulatory Commission  
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Washington, D.C. 20555

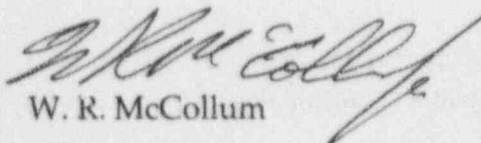
Subject: Catawba Nuclear Station  
Dockets 50-413 and 50-414  
Reply to Notice of Violation (NOV)  
Inspection Report 50-413, 414/95-16

Attached is Duke Power Company's response to the one (1) Level IV violation cited in Inspection Report 50-413, 414/95-16, dated August 7, 1995. This violation was identified during the Residents' monthly inspection conducted June 11, 1995 through July 8, 1995.

In the NOV cover letter, it was indicated that this violation was of concern because it is important that proper configuration of plant systems be maintained in order to prevent challenges to safe plant operations. We acknowledge the concern this violation addresses. Proper configuration control of plant systems is of high importance. The corrective actions discussed in our response to this violation will, in addition to addressing the specific procedural inadequacy, ensure that future troubleshooting evolutions receive the proper level of engineering and management review prior to implementation.

If there are any questions concerning this response, please contact Kay Nicholson at (803) 831-3237.

Sincerely,

  
W. R. McCollum

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xc: S. D. Ebnetter, Regional Administrator  
R. E. Martin, ONRR  
R. J. Freudenberger, SRI

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**DUKE POWER COMPANY  
CATAWBA NUCLEAR STATION  
REPLY TO NOTICE OF VIOLATION  
413, 414/95-16-01  
Notice of Violation**

*Technical Specification 6.8.1, Procedures and Programs, requires, in part, that written procedures be established, implemented, and maintained covering the activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. As referenced, this includes the operation of the reactor coolant letdown system. Implicit in this requirement is the stipulation that the procedures be adequate for the circumstances.*

*Contrary to the above, on June 21, 1995, procedures were not adequate in that, OP/1/A/6200/01, Enclosure 4.2, Establishing Normal Letdown Flow and Securing Letdown Injection Flow from RHR, the procedure used to reestablish letdown flow after system troubleshooting, was inappropriate for the circumstances and failed to provide controls or precautions to alert the operators to the potential for depressurization of the letdown piping once it was isolated. When valve 1NV13A was opened during this troubleshooting, the letdown piping depressurized, and upon reestablishing normal letdown, a water hammer occurred damaging the letdown piping and causing a 0.5 gpm leak inside containment.*

*This is a Severity Level IV Violation (Supplement I).*

DUKE POWER COMPANY  
CATAWBA NUCLEAR STATION  
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413, 414/95-16-01

RESPONSE:

1. Reason for Violation

This violation is attributed to procedural inadequacy. The Operations procedure used during both the depressurization and repressurization did not adequately address the potential for a water hammer event when 1NV-13A (Letdown Orifice 1A Outlet Cont Isol) was stroked to the open position with 1NV-1A (NC Letdown to Regen Hx Isol) and 1NV-2A (NC Letdown to Regen Hx Isol) closed.

A contributing factor to this violation was the delayed resolution of Corrective Action (CA) 50 in Problem Investigation Process (PIP) 0-C94-1209 by Mechanical Systems (MSE). This PIP was initiated to track corrective actions relating to SOER 94-1, *Non-Conservative Decisions and Equipment Performance Problems Result in a Reactor Scram, Two Safety Injections, and Water-Solid Conditions*, for an event which occurred at Salem, Unit 1 on 04/07/94. A more timely resolution of CA 50 which was to provide improved guidance to the operators (provided in the OPs and APs) may have precluded this water hammer which occurred upon re-establishment of letdown flow.

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413, 414/95-16-01**

**2. Corrective Actions Taken and Results Achieved**

- A. Operations entered Abnormal Procedure AP/1/A/5500/10 (Reactor Coolant Leak) and took appropriate actions to isolate the letdown line leak.
- B. The letdown vent valves (1NV-895 and 1NV-897) and the hangers (1-R-NV-1007 and 1-R-NV-1393) were repaired per Maintenance procedures and corrective work orders 95027844, 95027845, 95027925, and 95027930.
- C. Normal letdown line was re-pressurized using Temporary Test Procedure TT/1/A/9200/94 (Pressurization of Normal Letdown Line). Normal letdown was established per AP/1/A/5500/12 (Loss of Charging or Letdown).
- D. AP/1(2)/A/5500/12 was revised to require station management evaluation of letdown line pressurization if either NV-1A or NV-2A is closed.
- E. This event was discussed in the Operations Shift Managers (OSMs) meeting on 08/17/95. It was communicated to the OSMs that this event was driven by inadequate procedures.
- F. The expectation that it is unacceptable to have any overdue PIPs has been communicated to all station personnel. The PIP backlog is reviewed weekly at the manager level.
- G. Operating procedures OP/1(2)/A/6200/01 (Chemical and Volume Control) were revised 08/30/95, to prevent the use of Enclosure 4.2 (Establishing Normal Letdown Flow and Securing Letdown From Residual Heat Removal System) with Reactor Coolant System temperature greater than 250° F.

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3. Corrective Action to be Taken to Avoid Future Violations

A. Operations management's expectations of including Systems/Electrical Engineering in future troubleshooting plans as an independent review will be communicated to the Operations Shift Managers by 10/01/95. This communication will emphasize the requirement to obtain operations/station management concurrence for future troubleshooting plans. This corrective action will be assigned to Operations and tracked as CA #7 in PIP 95-958.

4. Date of Full Compliance

Duke Power Company is now in full compliance.