

DUKE POWER COMPANY

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May 21, 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 30303

Re: RII:BTB
50-413/84-25
50-414/84-10

Dear Mr. O'Reilly:

Please find attached responses to Violation No. 413/84-25-01, 414/84-10-01 and Deviation No. 413/84-25-02, 414/84-10-02, 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

Hal B. Tucker

LTP/php

Attachment

cc: NRC Resident Inspector
Catawba Nuclear Station

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Duke Power Company
Catawba Nuclear Station

Violation:

10 CFR 55.10(d) requires that each application and statement shall contain complete and accurate disclosure as to all matters and things required to be disclosed.

10 CFR 55.10(a)(6) requires certification that the applicant has learned to operate the controls in a competent and safe manner and has need for an operator or senior operator license. This certification may be provided by an authorized representative of the facility licensee where the applicant's services will be utilized. The certification must include details on courses of instruction administered by the facility licensee, number of course hours, and the number of hours of training received at the facility.

Contrary to the above, in eleven instances inaccurate information was submitted by Duke Power Company as part of the required certification in February 1984 on applications for operator and senior operator licenses at the Catawba facility. However, if the correct information had been known at the time of the submittal, the license eligibility of the individual applicants would not have been affected.

Response:

- (1) Duke admits the violation as stated.
- (2) The reason the violation occurred was a failure to adequately audit the applications and eliminate misleading information. An inadequate understanding of the components of NRC Form 398 contributed to the problem.
- (3) Corrective steps which have been taken include:
 - (a) A complete audit of operator training records has been accomplished.
 - (b) Corrections were made to all records to accurately reflect training received and to remove redundant information.
 - (c) An attachment to NRC Form 398 was created to further explain information provided.
 - (d) Applications have been resubmitted.
- (4) The corrective actions listed in (3) should be sufficient to prevent further violations. In the future, all initial submittals of Form 398 will have the above mentioned attachment.
- (5) All further submittals of applications for operator and senior operator licenses will be in compliance with this response.

Duke Power Company
Catawba Nuclear Station

Deviation:

Catawba Nuclear Station Final Safety Analysis Report Section 13.2.2.2.2(k) states, in part, that the cold certification observation check list provides structured guidance for required observation tasks.

Contrary to the above, in 13 instances, cold certification observation check lists were not documented as completed for operator license candidates.

Corrective Action Taken:

All Cold Certification task lists were audited and the task lists were discussed with each individual in Cold License Group 1. The required tasks that were identified as not being completed were completed by May 7, 1984 prior to the oral examination. In addition an independent audit is being performed by Duke's Operations General Office staff. This audit will be completed by June 1, 1984. An audit will be performed on Cold License Group 2 and discrepancies resolved by July 5, 1984.

Actions Taken to Avoid Further Deviations:

Individuals involved have been instructed on the importance of proper documentation and performance of tasks.

Dates When Actions Will Be Completed:

Formal guidance is presently in place for present task lists and formal procedures will be developed and in place prior to beginning hot license training.