

Duke Power Company
Catawba Nuclear Generation Department
4800 Concord Road
York, SC 29745

WILLIAM R. MCCOLLUM, JR.
Vice President
(803) 831-3200 Office
(803) 831-3426 Fax



DUKE POWER

May 21, 1996

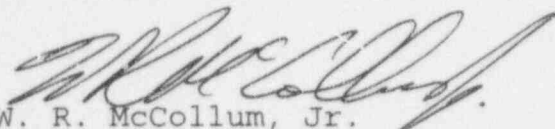
U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Catawba Nuclear Station
Dockets 50-413 and 50-414
Reply to Notice of Violation (NOV)
Inspection Report 50-413, 414/96-02

Attached is Duke Power Company's response to the two (2) Level IV violations cited in Inspection Report 50-413, 414/96-02, dated April 22, 1996. These violations were identified during inspections conducted February 11, 1996 through March 23, 1996.

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

Sincerely,


W. R. McCollum, Jr.

\KEN:RESP96.02

xc: S. D. Ebnetter, Regional Administrator
P. S. Tam, ONRR
R. J. Freudenberg, SRI

9605280286 960521
PDR ADOCK 05000413
G PDR

112

IE01
11

**CATAWBA NUCLEAR STATION
REPLY TO NOTICE OF VIOLATION
413, 414/96-02-07**

**Notice of Violation
Example 1**

10 CFR 50.71(e) requires the Final Safety Analysis Report (FSAR) be revised to include the effects of all changes in the facility.

FSAR Sections 9.1.2.3 and 9.1.3.1.3 indicate that the Spent Fuel Pool (SFP) is designed such that system connections could not result in inadvertently draining the pool below the level required for shielding.

Contrary to the above, the FSAR was not revised in that an NRC inspection conducted March 11-15, 1996, identified that the effects of changes made to the facility by the installation of the Safe Shutdown System (SSS) during the construction phase of the station were not appropriately described in the FSAR. Specifically, the piping connections to supply reactor coolant pump seal water during an SSS event could allow inadvertent draining of the SFP below the level required for shielding.

This is a Severity Level IV violation (Supplement IV).

CATAWBA NUCLEAR STATION
REPLY TO NOTICE OF VIOLATION
413, 414/96-02-07

RESPONSE:

1. Basis for Contesting the Violation

The changes to the facility described in this violation did not invalidate the FSAR as written.

The FSAR sections referenced in the Notice of Violation apply specifically to the Spent Fuel Cooling (KF) System. References to "system connections" in either of these two FSAR sections can only be interpreted to mean KF system connections. The ANSI standard referenced in FSAR Section 9.1.2.3 specifically excludes the fuel transfer tube from the requirement of locating pool penetrations above the water levels required for shielding. All KF system connections to the SFP are above the level required for shielding or contain siphon breaks to preclude draining below this level in conformance with this standard. In any case, the fuel transfer tube is not considered to be KF system piping. Also, the SSF pump and associated suction piping are part of the Chemical and Volume Control (NV) system.

The fuel transfer tube as well as the SSF pump suction line (up to and including the suction isolation valve) are designed to meet NRC Quality Group B standards. Each conforms to the GDC 51 requirement for fracture prevention of the containment pressure boundary. A non-mechanistic failure of these lines is not considered credible. In the unlikely event of some type of loss of structural integrity in the SSF pump suction line, Duke has analyzed a non-mechanistic rupture of this line and determined that sufficient time exists for operator action to terminate the leakage well before the minimum level for shielding is reached. The use of operator action to mitigate the consequences of this "beyond design basis" event was reviewed in the inspection and deemed acceptable.

Based on the discussion presented herein, Duke Power Company contends that the FSAR Sections 9.1.2.3 and 9.1.3.1.3 are correct as written and denies Example 1 as presented in the Notice of Violation.

CATAWBA NUCLEAR STATION
REPLY TO NOTICE OF VIOLATION
413, 414/96-02-07

2. Corrective Actions Taken and Results Achieved

FSAR section 9.1.3.1.3 was revised to make clear that there are connections to the Spent Fuel Pool (other than KF system connections) which are below the water level required for shielding. Section 9.1.2.3 has also been revised to reference Section 9.1.3.1.3. This revision was written to augment the existing FSAR section, and thereby avoid any lack of clarity that might have existed.

Problem Investigation Process (PIP) 0-C-96-1090 was generated as the tracking document for this item.

3. Corrective Action to be Taken to Avoid Future Violations

No additional corrective actions will be taken.

4. Date of Full Compliance

Duke Power Company is in full compliance.

**CATAWBA NUCLEAR STATION
REPLY TO NOTICE OF VIOLATION
413, 414/96-02-07**

**Notice of Violation
Example 2**

10 CFR 50.71(e) requires the Final Safety Analysis Report (FSAR) be revised to include the effects of all changes in the facility.

FSAR Section 11.5.1.2.2 indicates that the Catawba Nuclear Station uses continuous air samplers, which utilize silver zeolite cartridges for iodine sampling to minimize interference from high levels of noble gases, to monitor radioactive iodines and particulates contained in the plant gaseous effluent.

Contrary to the above, the FSAR was not revised in that on February 27, 1996, it was identified that the licensee does not currently use and had never used silver zeolite cartridges in the continuous air samplers that are used to monitor radioactive iodines and particulates in plant gaseous effluents. This change from the original FSAR was not described in the latest updated FSAR submitted to the Commission.

This is a Severity Level IV violation (Supplement IV).

**CATAWBA NUCLEAR STATION
REPLY TO NOTICE OF VIOLATION
413, 414/96-02-07**

RESPONSE:

1. Reason for Violation

Duke Power Company acknowledges this example of the violation. The root cause for this violation is attributed to inadequate document review during previous FSAR revision periods.

2. Corrective Actions Taken and Results Achieved

Following discovery of the FSAR discrepancy, Radiation Protection (RP) staff began a review of Section 11.5.1.2.2 of past editions of the FSAR to ensure consistency in wording throughout the history of the document. This review revealed that the statement in question had not changed from the original Catawba FSAR submitted.

Comparisons were made to establish that there were no significant differences between the functionality of silver zeolite cartridges and charcoal cartridges for collection and analysis of radioiodines. No significant differences were identified.

All applicable RP procedures were reviewed to ensure that no steps had been changed or revised to incorporate the use of silver zeolite cartridges instead of charcoal cartridges. No procedures were affected.

3. Corrective Action to be Taken to Avoid Future Violations

- a) A study is being conducted to determine cartridge applications currently in use at Catawba. This study will be completed by 06/15/96.
- b) Based on the results of this study, FSAR mark-ups will be submitted to Regulatory Compliance by 06/15/96 to revise Section 11.5.1.2.2. The revised FSAR will be worded such that all references to cartridge applications will be clear and accurate for plant systems.

**CATAWBA NUCLEAR STATION
REPLY TO NOTICE OF VIOLATION
413, 414/96-02-07**

- c) A full review of other sections of the FSAR applicable to RP will be performed by RP staff and management to ensure appropriate, current cartridge applications are identified. If discrepancies are identified, mark-ups will be submitted to Regulatory Compliance by 07/15/96 for incorporation into the next FSAR revision.
- d) A multi-phase department review of the FSAR update process is currently underway to identify areas for improvements. Phase I was completed on 05/01/96; Phase II will incorporate changes into existing or new procedures to improve the quality and accuracy of the FSAR.

4. Date of Full Compliance

Duke Power Company is now in full compliance.

**CATAWBA NUCLEAR STATION
REPLY TO NOTICE OF VIOLATION
413, 414/96-02-09**

Notice of Violation

Technical Specification 6.8.1 requires, in part, that written procedures be established, implemented, and maintained covering the activities referenced in the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, dated February 1978. Paragraph 7.e of Appendix A to Regulatory Guide 1.33 states that the licensee should have written radiation protection procedures.

Duke Power Company, System Radiation Protection Manual, Procedure No. III-15, titled Access Controls for High, Extra High and Very High Radiation Areas, Revision 5, dated January 20, 1995, states that the purpose of this procedure is to establish and define the proper control for access to High, Extra High and Very High Radiation Areas.

Section 5.2.3, titled Extra High Radiation Key Control, to System Radiation Protection Manual, Procedure No. III-15 as prepared consistent with the requirements of 10 CFR Part 20 and states, in part, that keys will be maintained in a locked box under the control of Radiation Protection.

Contrary to the above requirement, the licensee failed on February 29, 1996, to maintain keys to Extra High Radiation Areas in a locked storage box.

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

CATAWBA NUCLEAR STATION
REPLY TO NOTICE OF VIOLATION
413, 414/96-02-09

RESPONSE:

1. Reason for Violation

Duke Power Company acknowledges this violation. This violation is attributed to a mechanical failure of the spring back mechanism in the lock.

This model combination lock requires the tumblers to be turned in order for the lock to secure. It is designed with a spring back feature which raises the hasp to the open position when attempting to secure the lock with the tumblers set on the lock combination.

The spring back feature failed, allowing the lock to close while set on the combination. This failure also allowed the lock to look, sound and feel as if it were secured.

A contributing factor to this violation was that the last Radiation Protection technician to operate the lock did not perform a self-check to verify the lock was actually secured.

2. Corrective Actions Taken and Results Achieved

A RP technician was assigned to maintain positive control over the key box until the lock could be replaced.

A key box inventory was performed to account for all keys.

All locks to the Extra High Radiation Area and the Very High Radiation Area key boxes were replaced with a model designed without the spring back feature, and which secure when the hasp is inserted into the lock regardless of the combination position. These locks were replaced within four hours of the problem being identified.

The RP technician who failed to verify the lock was secured was counseled as to the potential severity of the event and the proper use of the Second Checking Technique.

An electronic communication was sent to all RP personnel regarding the event, emphasizing the potential severity of the event, and the proper use of the Second Checking Technique.

CATAWBA NUCLEAR STATION
REPLY TO NOTICE OF VIOLATION
413, 414/96-02-09

Problem Investigation Process (PIP) 0-C-96-0513 was generated as the tracking document for completion of the commitments pertaining to this violation.

3. Corrective Action to be Taken to Avoid Future Violations

No additional corrective actions will be taken.

4. Date of Full Compliance

Duke Power Company is now in full compliance.