

Duke Power Company
Catawba Nuclear Generation Department
4900 Concord Road
York, SC 29745

M.S. TUCKMAN
Vice President
(803)831-3205 Office
(803)831-3425 FAX



DUKE POWER

December 3, 1992

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

Subject: Catawba Nuclear Station
Docket Nos. 50-413 and 50-414
Reply To A Notice Of Violation
NRC Inspection Report 50-413/92-24 and 50-414/92-24

Attached is Duke Power's response to the Level IV violation cited in the Notice of Violation by subject Inspection Report dated November 9, 1992.

The violation involved various minor deficiencies relating to scaffolding.

Very truly yours,

A handwritten signature in cursive script that reads "M.S. Tuckman".

M.S. Tuckman

JLL/

Attachment

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9212140132 921203
PDR ADOCK 05000413
Q PDR

Handwritten initials "JED" and a vertical line.

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xc: S.D. Ebnerter
Regional Administrator, Region II

R.E. Martin, ONRR

W.T. Orders
Senior Resident Inspector

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bxc: R.L. Gill
R.O. Sharpe
M.E. Patrick
A.V. Carr
D.B. Cook
NCMPA-1
NCEMC
SREC
PMPA
Group File: CN-815.01 (92-24)
Document Control: 815.01

DUKE POWER COMPANY
REPLY TO A NOTICE OF VIOLATION
413,414/92-24-C2

Technical Specification 6.8.1 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. Maintenance Procedure MP/O/A/7650/115, Erection and Removal of Scaffolding, prohibits scaffolding from being secured to piping less than three inches in diameter, prohibits scaffolding from being secured to piping with mirror insulation, requires that security/stacking pins be installed in all sections, and requires that decking/planking and toeboards be secured.

Contrary to the above, MP/O/A/7650/115 was not followed on July 15, 1992, when maintenance personnel erected scaffolding in the 2A and 2B Diesel Generator rooms in that they secured scaffolding to 3/4 inch piping, secured scaffolding to piping with mirror insulation, failed to install security/stacking pins in all scaffolding sections, and failed to secure certain sections of decking/planking and toeboards.

This is a Severity Level IV Violation.

RESPONSE:

1. Reason For Violation

This violation is attributed to inappropriate action for not following the scaffolding general guidelines by maintenance personnel responsible for erection of scaffolds due to a lack of attention to detail. Also, the scaffolds were erected in an unusual and difficult location, which compounded the problem of following the procedure requisites.

DUKE POWER COMPANY
REPLY TO A NOTICE OF VIOLATION
413,414/92-24-02

2. Corrective Actions Taken And Results Achieved

The various NRC-identified minor deficiencies were corrected in compliance with the scaffolding procedure (MP/O/A/7650/115). The scaffolds were removed several days later upon completion of the related corrective maintenance activities.

The requirements of the scaffolding procedure were re-emphasized with the appropriate maintenance personnel involved with scaffolding erection and removal to ensure that procedure instructions are followed.

A walkdown was performed to inspect erected station scaffolding to ensure scaffolding currently in use was erected in compliance with scaffolding procedure requirements.

3. Corrective Actions To Be Taken To Avoid Further Violations

Component Engineering, with assistance from Civil Engineering, will evaluate the procedural requirements for erection and removal of scaffolding for possible enhancements and improvements by June 1, 1993.

Station Directive 3.8.12 (Installation of Temporary Shielding and Scaffolding) will be revised to provide better guidance for installation of scaffolding by June 1, 1993.

4. Date Of Full Compliance

Duke Power is now in full compliance.