



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
101 MARIETTA STREET, N.W.  
ATLANTA, GEORGIA 30323

DEC 24 1992

Report Nos.: 50-413/92-30 and 50-414/92-30

Licensee: Duke Power Company  
422 South Church Street  
Charlotte, NC 28242

Docket Nos.: 50-413 and 50-414

License Nos.: NPF-35 and NPF-52

Facility Name: Catawba 1 and 2

Inspection Conducted: November 30 to December 4, 1992

Inspector:

*W. P. Kleinsorge*  
W. P. Kleinsorge P.E.  
Reactor Inspector

*12/14/92*  
Date Signed

Approved by:

*J. J. Blake*  
J. J. Blake, Chief  
Material and Process Section  
Engineering Branch  
Division of Reactor Safety

*12/14/92*  
Date Signed

SUMMARY

Scope:

This routine, announced inspection was conducted in the areas of followup on licensee's actions on previous enforcement matters and the Main Steam system leak identified by the licensee November 30, 1992.

Results:

Eight previously identified violations were examined and closed. As part of the corrective actions to address violation 50-413,414/90-201-01, the licensee committed to complete the upgrade of a number of maintenance procedures by varying future dates, from December 31, 1992 to August 1, 1994. Three unresolved items were opened to track the completion of those procedure upgrades. The licensee continues to exhibit a weakness in the area of documentation of corrective actions related to regulatory enforcement issues.

The licensee took appropriate actions in response to the Main Steam system leak.

No violations or deviations were identified.

## 1. Persons Contacted

## Licensee Employees

- \*J. Cox, Acting Regulatory Compliance Manager
- \*J. Lawrey, Regulatory Compliance Specialist
- \*C. Lewis, Associate Engineer
- \*W. McCollum Jr., Station Manager
- \*K. Seasely, Regulatory Compliance

Other licensee employees contacted included technicians, operators, and office personnel.

## NRC Resident Inspectors

- \*W. Orders, Senior Resident Inspector
- \*J. Zeiler, Resident Inspector
- \*S. Congle, Intern

\* Attended the exit interview.

## 2. Followup on Licensee's Action on Previously Identified Enforcement Matters (92702)

- a. (Closed) Violation 50-413,414/90-201-01: "Inadequate Procedures-Eight Examples"

This violation concerned multiple examples of procedures that did not contain appropriate qualitative or quantitative acceptance criteria for determining that important activities have been satisfactorily accomplished. The NRC has reviewed the licensee's letter of response dated August 22, 1991, and found it acceptable. In their letter, the licensee admitted to the violation and attributed the cause of this violation to procedures with inadequate detail or guidance. The licensee revised the specifically identified procedures, and is continuing their procedure upgrade program. The licensee committed to revise or provide approximately 1925 procedures by varying dates from December 31, 1992 to August 1, 1994. The licensee has completed the upgrade of all the Mechanical Maintenance procedures and all the Priority 1 Instrumentation and Electrical (IAE) and Power Delivery (PD) procedures. The licensee to date has upgraded approximately 1400 of the 1925 procedures. The inspector is satisfied that the licensee has corrected the specific discrepant conditions, and performed the necessary survey to determine the full extent of the problem. Although the licensee has not completed their procedure upgrade program they have a program in place that should assure the completion of the committed procedure upgrades (less than 500 procedures remain to be upgraded). This matter will be closed as a violation.

The completion of the remaining procedure upgrades will be tracked by the following unresolved items:

- 50-413,414/92-30-01: "Priority 2 IAE Procedure Upgrades Due April 30, 1993"

Of the original, approximately 556, Priority 2, Instrumentation and Electrical (IAE) procedures that the licensee committed to upgrade, 50 remain to be completed by April 30, 1993.

- 50-413,414/92-30-02: "Priority 3 IAE Procedures Upgrades Due August 1, 1994"

Of the original, approximately 557, Priority 3, Instrumentation and Electrical (IAE) procedures that the licensee committed to upgrade, 419 remain to be completed by August 1, 1994.

- 50-413,414/92-30-03: "Priority 2 PD Procedures Upgrades Due December 31, 1992"

Of the original, approximately 40, Priority 2, Power Delivery (PD) procedures that the licensee committed to upgrade, 24 remain to be completed by December 31, 1992.

- b. (Closed) Violation 50-413,414/90-201-02: "Failure to Follow Procedures-Seven Examples"

This violation concerned multiple instances where personnel failed to follow approved procedures during the performance of work. The NRC has reviewed the licensee's letter of response dated August 22, 1991, and found it acceptable. In their letter, the licensee admitted to the violation and attributed the cause of this violation to individual performance deficiencies. The licensee upgraded the two specific procedures to make them more "user friendly" and conducted training. The licensee was unable to provide the inspector with objective evidence attesting to the accomplishment of some of the training indicated in the letter of response, but through interviews with licensee personnel, the inspector was able to substantiate that the training had been provided. The inspector is satisfied that the licensee has corrected the specific discrepant conditions, and performed the necessary survey to determine the full extent of the problem. This matter is considered closed.

- c. (Closed) Violation 50-413,414/90-201-03: "Failure to Meet Independent Verification Requirements"

This violation concerned multiple examples where technicians failed to adhere to the independent verification requirements of the procedures to which they were working. The NRC has reviewed the licensee's letter of response dated August 22, 1991, and found it acceptable. In their letter, the licensee admitted to the violation

and attributed the cause of this violation to differing interpretations of "Independent" Verification (IV). The licensee trained the IAE personnel in the importance of IV, enhanced the corporate and station directives addressing IV to assure that the directives are consistent with INPO guidelines, and evaluated the site implementation of IV. The licensee was unable to provide the inspector with a copy of the report of the implementation evaluation, but through interviews with licensee personnel, the inspector was able to substantiate that evaluation. The inspector is satisfied that the licensee has corrected the specific discrepant conditions, and performed the necessary survey to determine the full extent of the problem. This matter is considered closed.

- d. (Withdrawn) Violation 50-413,414/90-201-04: "Failure to Perform Procedure Reviews"

This violation concerned the failure to perform a biannual review of Station Directive Procedures as required. The licensee indicated in their letter of response dated August 22, 1991, that this issue had already been cited as violation 50-413,414/90-32-01, and requested that this violation be withdrawn. This violation was withdrawn by NRC letter dated October 9, 1991.

- e. (Closed) Violation 50-413,414/90-201-05: "Failure to Report IAW 50.73"

This violation concerned the failure to issue, or issue in a timely fashion, Licensee Event Reports (LERs) as required. The NRC has reviewed the licensee's letter of response dated August 22, 1991, and found it acceptable. In their letter of response the licensee admitted to the violation and attributed the cause of this violation to inattention to detail. The licensee conducted training, recalibrated all affected breakers, and sent a letter to Transmission and Site Design personnel to make them aware of the need for prompt action when suspected TS violation occurs. The licensee was unable to provide the inspector with objective evidence attesting to the accomplishment of some of the training indicated in the letter of response; in addition, the licensee was unable to provide the inspector a copy of the letter sent to Transmission and Site Design groups. Through interviews with licensee personnel the inspector was able to substantiate that the training had been provided and that the letter was sent. The inspector is satisfied that the licensee has corrected the specific discrepant conditions, and performed the necessary survey to determine the full extent of the problem. This matter is considered closed.

- f. (Closed) Violation 50-413,414/90-201-06: "Failure to Meet License Conditions-Battery Packs Inoperable"

This violation concerned the licensee's failure to maintain numerous battery pack emergency lighting units as required. The NRC has reviewed the licensee's letter of response dated August 22, 1991,

and found it acceptable. In their letter, the licensee admitted to the violation and attributed the cause of this violation to an inadequate maintenance testing program. The licensee revised the testing program procedure, replaced all of the existing batteries, and conducted an evaluation of the effectiveness of the testing program. During the battery replacement effort, the licensee discovered, that at three of the emergency light locations, the emergency lighting assemblies were absent. The licensee stated that the information concerning the missing emergency lighting assemblies had been transmitted only verbally to engineering for resolution. The inspector indicated that without a document trail, the potential exists that the request for resolution could be lost. Subsequently the licensee issued three work requests to replace the missing emergency lighting units. The requested completion dates for the replacements is December 31, 1992. The inspector is satisfied that the licensee has corrected the specific discrepant conditions, and performed the necessary survey to determine the full extent of the problem. This matter is considered closed.

- g. (Closed) Violation 50-413,414/90-201-07: "Failure to Take Prompt Corrective Actions-Ten Examples"

This violation concerned numerous instances where the licensee's personnel failed to initiate deficiency reports when conditions adverse to quality occurred, as required. The NRC has reviewed the licensee's letter of response dated August 22, 1991, and found it acceptable. In their letter, licensee admitted to the violation and attributed the cause of this violation to insufficient sensitivity on the part of operators as to when Problem Investigation Reports (PIRs) should be issued. The licensee emphasized the need for increased sensitivity to, the need for, and the issuance of PIRs. Although the licensee was unable to provide the inspector with objective evidence attesting to the accomplishment of the actions taken to emphasize the need for PIRs as indicated in the letter of response, there was a significant increase in the number of PIRs issued, after the emphasis effort, indicating a measure of the effectiveness of that effort. The inspector is satisfied that the licensee has corrected the specific discrepant conditions, and performed the necessary survey to determine the full extent of the problem. This matter is considered closed.

- h. (Closed) Violation 50-413,414/90-201-09: "Failure to Issue Conforming Parts"

This violation concerned inadequacies in the licensee's procedures governing the shelf-life program for materials used in safety-related equipment. The NRC has reviewed the licensee's letter of response dated August 22, 1991, and found it acceptable. In their letter of response the licensee admitted to the violation and attributed the cause of this violation to a weakness in their shelf-life procedure. The licensee revised the shelf life program procedure, and conducted an audit to determine the effectiveness of

the program modification. The inspector requested a copy of the audit report on the first day of the inspection. On the last day of the inspection the licensee informed the inspector that no audit report was written. The licensee then provided the inspector with the audit notes and a summary report of the audit dated the last date of this inspection. The audit notes consisted of an annotated printout of all shelf-life items in stock in the time frame of the response. The annotations related to the appropriateness of the shelf life dates. Through interviews with licensee personnel and a review of the annotated audit notes, the inspector was able to substantiate the effectiveness of the program changes. The inspector is satisfied that the licensee has corrected the specific discrepant conditions, and performed the necessary survey to determine the full extent of the problem. This matter is considered closed.

i. (Closed) Violation 50-413,414/90-201-09: "Failure to Control Procedures-Two Examples"

This violation concerned the licensee's failure to implement document control measures. The NRC has reviewed the licensee's letter of response dated August 22, 1991, and found it acceptable. In their letter of response the licensee admitted to the violation and attributed the cause of this violation to insufficient detail in a procedure and an uncontrolled drawing left by person or persons unknown. The licensee conducted training, revised procedures, removed the uncontrolled document and conducted a search for other uncontrolled documents. The licensee was unable to provide the inspector with objective evidence attesting to the accomplishment of some of the training indicated in the letter of response. Through interviews with licensee personnel the inspector was able to substantiate that the training was provided. The inspector is satisfied that the licensee has corrected the specific discrepant conditions, and performed the necessary survey to determine the full extent of the problem. This matter is considered closed.

In late August 1992, as reported in NRC Inspection Report (IR) 50-413,414/92-23, an attempt was made to examine the licensee's action(s) in response to the violations cited in NRC IR 50-413,414/90-201. The report indicated that the corrective action documentation was incomplete and not well organized. This inspector found the situation unchanged. The licensee was unable to provide records to support much of the training described in the letter of response to the violations. In addition several other documents alluded to in the letter of response were not retrievable. A significant amount of the documentation necessary to substantiate the statements made in the letter of response, had to be assembled during this inspection. The above indicates the licensee continues to exhibit a weakness in the area of documentation of corrective actions related to regulatory enforcement issues.

Within the areas examined no deviations or violations were identified.

### 3. Main Steam System Leak

On November 30, 1992 the licensee identified a small steam leak in a one inch main steam system line at the heat affected zone, on the pipe side of a "Y" strainer to pipe socket weld. This weld is located near valve 2SM45. The line is Duke Class G (non safety-related). The licensee effected a temporary repair of this leak by sleeving the entire pipe section from the socket weld on the "Y" strainer to the socket weld on the next downstream fitting. The licensee indicated that they would perform ultrasonic thickness examinations of the adjacent piping to determine the extent of any erosion/corrosion attack. This line is not included in the licensee's CHECMATE Erosion Corrosion electronic model because the model excludes piping less than two inch. The inspector visually inspected the completed temporary repair, and examined records attesting to welder qualification, welding procedure specification qualification, and welding filler material receiving inspection and certification. The inspector determined that the repair was made by properly qualified welders using certified welding filler material in accordance with a qualified welding procedure specification. The licensee took appropriate actions in response to this event.

Within the areas examined no deviations or violations were identified.

### 4. Exit Interview

The inspection scope and results were summarized on December 4, 1992, with those persons indicated in paragraph 1. The inspector described the areas inspected, and discussed the inspection findings listed below. Although reviewed during this inspection, proprietary information is not contained in this report. Dissenting comments were not received from the licensee.

Unresolved Item 50-413,414/92-30-01: "Priority 2 IAE Procedures Upgrades Due April 30, 1993"

Unresolved Item 50-413,414/92-30-02: "Priority 3 IAE Procedures Upgrades Due August 1, 1994"

Unresolved Item 50-413,414/92-30-03: "Priority 2 PD Procedures Upgrades Due December 31, 1992"

## 5. Acronyms and Initialisms

IAE	-	Instrumentation and Electrical
IAW	-	In Accordance With
INPO	-	Institute for Nuclear Power Operations
IR	-	Inspection Report
IV	-	Independent Verification
LER	-	Licensee Event Report
NPF	-	Nuclear Power Facility
NRC	-	Nuclear Regulatory Commission
P.E.	-	Professional Engineer
PD	-	Power Delivery
PIR	-	Problem Investigation Report
TS	-	Technical Specifications