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April 23, 1985

Dr. J. Nelson Grace, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Re: RII:PHS/PKV
50-413/85-05

Dear Dr. Grace:

Please find attached a response to Violation No. 413/85-05-02 and Deviation No. 413/85-05-03, 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,

Hal B. Tucker/mjf

Hal B. Tucker

LTP/mjf

Attachment

cc: NRC Resident Inspector
Catawba Nuclear Station

Robert Guild, Esq.
P. O. Box 12097
Charleston, South Carolina 29412

Palmetto Alliance
2135½ Devine Street
Columbia, South Carolina 29205

Mr. Jesse L. Riley
Carolina Environmental Study Group
854 Henley Place
Charlotte, North Carolina 28207

IE01

DUKE POWER COMPANY
CATAWBA NUCLEAR STATION

Violation:

10 CFR 50, Appendix B, Criterion XII as implemented by the licensee's accepted quality assurance program (Duke 1-A, Amendment 7) requires that measures be established to assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits. The QA Program conforms to Regulatory Guide 1.33 and endorses ANSI N18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants. Section 5.2.16 of this standard requires that when calibration, testing, or other measuring devices are found to be out of calibration an evaluation shall be made and documented concerning the validity of previous tests and the acceptability of devices previously tested from the time of the previous calibration.

Contrary to the above, measures have not been fully established to assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled in that, no program requirements have been established to require re-evaluation and documentation of the validity of previous tests when installed process control instrumentation used to determine Technical Specification compliance.

Response:

1. Duke Power Company admits the violation.

2. Inadequate comprehensive administrative controls existed to clearly and explicity direct station personnel how to control calibration of process instrumentation used to satisfy acceptance criteria for Technical Sepcification Surveillance tests. A contributing factor to this violation is the station being in a startup phase with the burden for calibrating process instrumentation transferring to the Instrument and Electrical group from the groups responsible for the specific surveillance tests.

3. All affected Instrument and Electrical (I&E) personnel have been instructed to make copies of all data sheets containing "Out of Tolerance" instruments. These will be forwarded to a designated person in the I&E group. This person will in turn formally notify the group who utilized the out of tolerance instrument to conduct a surveillance required by Technical Specifications. All groups who utilize process instrumentation to carry out surveillances have been instructed on this interim measure that has been established until a formal program can be implemented.

4. Specific instrument calibration procedures containing instruments which are used for Technical Specification surveillances will be changed to give specific guidance to ensure that copies of data sheets of affected instruments found to be "Out of Tolerance" are transmitted to the affected group. Specific instructions and guidance will be developed and incorporated into station directives so that all affected groups are aware of these requirements. These actions will avoid further violations.

5. The corrective actions in (3) will ensure compliance until the actions in (4) are complete. The actions in (4) will be completed by November 1, 1985. Catawba will be in full compliance at this time.

DEVIATION:

The Licensee identified to the NRC in the Final Safety Analysis Report, Section 1.9, Table 1.9-3, Reference Item L Implementation Schedule, that the Reactor Vessel Level Indicating System (RVLIS) will become fully operational before initial criticality.

Contrary to the above, the RVLIS system was not fully operational before initial criticality. The system became fully operational on or about January 29, 1985.

RESPONSE:

To correct this deviation, the FSAR will be revised to clearly show when the RVLIS will become fully operational. This revision will avoid any deviations when the Unit 2 RVLIS becomes operational. The revision to the FSAR will be accomplished before November 1, 1985.