

NOTICE OF VIOLATION

Duke Power Company
Catawba Nuclear Station

Docket Nos. 50-413, 50-414
License Nos. NPF-35, NPF-52

During an NRC inspection conducted on July 28, 1996 - September 7, 1996, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide (RG) 1.33, revision 2. As referenced, this includes procedures for operation of the shutdown cooling system and for the performance of surveillance tests. Implicit in this requirement is the stipulation that the procedures be adequate for the circumstances.
1. Contrary to the above, on August 4, 1996, procedure OP/2/A/6200/04, Residual Heat Removal System, Retype #13, was inadequate in that it established conditions that resulted in the failure of Valve 2ND-53, residual heat removal (RHR) heat exchanger 2B inlet isolation valve. As a result, train B of the residual heat removal system was inoperable during unit shutdown from Mode 4 to Mode 5 and remained inoperable from 10:00 a.m. on August 4, 1996 until 4:00 p.m. on August 7, 1996.
 2. Contrary to the above, on August 14, 1996, procedure PT/1/A/4700/14, Auxiliary Shutdown Panel 1B Functional Test, Retype #0, Enclosure 13.9, Control Room/Auto Closure of INI-65B and INI-88B, was inadequate in that it directed plant personnel to energize a relay during Auxiliary Safeguards Panel testing that caused unanticipated safety-related component actuations. As a result, dilution flow was isolated to a portion of the Nuclear Service Water System that was supporting a liquid radioactive waste release.

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

- B. 10 CFR 50 Appendix B, Criterion III, Design Control, requires that design bases shall be adequately translated into specifications and that measures shall be established for verifying or checking the adequacy of design. Measures shall also be established for the selection and review for suitability of application of equipment that is essential to the safety-related functions of components.
1. Contrary to the above, review for suitability of equipment that is essential to the safety-related functions of components was inadequate for its application in that on August 22, 1996, the NRC identified that the nameplate rating of solenoid valves required for the safety-related

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function of the Unit 1 and 2 main steam isolation valves was less than the maximum instrument air system design pressure. This resulted in the unrecognized potential to degrade the ability of the main steam isolation valves to close in the event of an instrument air system malfunction.

2. Contrary to the above, design bases were not adequately translated into specifications and the design adequacy was not properly verified in that on August 12, 1996, design input errors were identified in the Standby Shutdown System Make-up Pump (SMUP) suction pulsation dampener design function engineering analysis, Calculation 1223.04-00-0009, Unit 1 and 2 SMUP Sizing, dated November 1, 1993, which resulted in the incorrect conclusion that the SMUP was operable for the 72 hour period analyzed for a Standby Shutdown System event.

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

- C. Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide (RG) 1.33, revision 2. As referenced, this includes radiation protection procedures for access control to radiation areas.

Radiation Protection Directive No. II-1, Radiation Area Access and Monitoring Devices, Section 3.0, Regulatory and Administrative Requirements, requires all personnel who enter the Radiation Control Area shall be issued and required to wear Thermoluminescent Dosimeters when in this area. Additionally, a body burden analysis and General Employee Training shall have been completed prior to the issuance of dosimetry, or a documented waiver from the Radiation Protection Manager shall be obtained.

Contrary to the above, on July 19, 1996, an individual entered the Radiologically Controlled Area of the facility without a Thermoluminescent Dosimeter, a body burden analysis, or General Employee Training. Waivers of the body burden analysis and the General Employee Training were not obtained from the Radiation Protection Manager.

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

Pursuant to the provisions of 10 CFR 2.201, Duke Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the Catawba Nuclear Station, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that

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will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or demand for information may be issued so as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Atlanta, Georgia
this 7th day of October, 1996