

LMB

DUKE POWER COMPANY

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VICE PRESIDENT  
NUCLEAR PRODUCTION

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05 JAN 17 10:24

January 10, 1986

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

Re: RII:PKV/PHS  
Catawba Nuclear Station  
50-413/85-48  
50-414/85-56

Dear Dr. Grace:

Attached are responses to Violation No. 413/85-48-01 and Violation  
No. 414/85-56-01, as referenced in the subject Inspection Report.

Very truly yours,

*H.B. Tucker*

Hal B. Tucker

LTP/jgm

Attachments

xc: NRC Resident Inspector  
Catawba Nuclear Station

8601290026 860110  
PDR ADOCK 05000413  
Q PDR

IE01

Violation 50-413/85-48-01

Technical Specification (TS) 3.6.5.6 requires that two containment air return systems be operable in Modes 1, 2, 3, and 4. TS 3.0.4 requires that entry into an Operational Mode or other specified conditions shall not be made unless the conditions for the limiting condition for operation are met without reliance on provisions contained in the action requirements.

Contrary to the above, entry was made into operational Mode 4 and subsequent higher modes on November 13, 1985, with only one containment air return system operable.

Response:

- (1) Duke Power Company admits the violation.
- (2) Reason for the violation: The unit was in cold shutdown at the time the air return fan damper was initially suspected to be inoperable (loss of position indication). The shift operator prepared a maintenance work request to investigate the problem, and correctly identified the need to resolve the problem prior to entering Mode 4, Hot Shutdown. The violation occurred due to a deficiency in the handling of work items affecting technical specifications related systems and equipment which are identified and/or worked while the unit is in an operating mode for which the technical specification is not applicable.
- (3) The cause of the inoperable condition (blown control fuse) was corrected within one hour of determination the damper was in fact inoperable.
- (4) To avoid future violations of TS 3.0.4 a work request priority system which specifically identifies work items which must be completed prior to restart following an outage is being implemented. This priority system, combined with our outage planning and scheduling program, will assure that all maintenance work items, both corrective and preventative, which affect technical specifications related systems and equipment will be stamped "TECH SPEC RELATED". This will increase the visibility of these items to all groups who process them and aid in assuring that they are given proper attention. A special listing of these items will be prepared and reviewed prior to each startup from a cold shutdown. Had these programs been in effect earlier, similar violations may have been avoided.
- (5) We will be in full compliance by April 1, 1986.

Violation 50-414/85-56-01

10 CFR 50, Appendix B, Criterion V as implemented by Duke Power Company (DPC) Topical Report DUKE-1-A, Section 17.1.5.2 requires that activities affecting quality be accomplished in accordance with established procedures. DPC QA Procedure Q1, Rev. 24 requires licensee personnel to initiate a Nonconformance Item Report (NCI) for items which do not meet design requirements and which are unable to be addressed through other established mechanisms.

Contrary to the above, a water hammer which occurred in April 1985 involving the Containment Spray System was not documented on an NCI resulting in an incomplete evaluation. The water hammer resulted in at least one hanger, 2-R-NS-0080, being partially pulled out of the wall and which was not discovered by Duke personnel.

Response:

- (1) Duke Power Company admits the violation.
- (2) This violation occurred as a result of an error in technical judgement by the responsible Test Engineer, during one pump (2B) start of the preliminary test for the Containment Spray (NS) system. Test assistants, positioned along the test boundary, reported a loud bang in the pipe with accompanying movement. The Test Engineer investigated this event and based upon discussions with the test technicians along the boundary, determined the potential water hammer was confined to an area on elevation 577 in the penetration room. The Test Engineer personally inspected this area and discovered no damage. This evaluation led the Test Engineer to determine the event was not significant and did not need to be elevated to a Non-conforming Item Report or be further evaluated.
- (3) This water hammer event has since been elevated to a Non-conforming Item Report (#19956) and has been closed out following a Design Engineering evaluation and subsequent field inspection. The organization that existed at the time of this violation no longer exists. The responsibility for this testing during which the event occurred was within the Construction Department. However, currently, the responsibility for all pre-operational testing is that of Nuclear Production Operations. Since the potential for a recurrence of this does not exist within the Construction Department, no further corrective action was found to be necessary for Construction personnel. Further investigation has determined this event was an isolated case that occurred during the initial testing phase of construction.
- (4) Duke Power Company will reaffirm its position regarding the significance of water hammer events to appropriate Nuclear Production Operations personnel. Catawba Station Management will generate a letter instructing all appropriate individuals to document water hammer events to assure a proper evaluation occurs.
- (5) Catawba will be in full compliance by March 1, 1986.