

DUKE POWER COMPANY

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HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

TELEPHONE
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August 29, 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:JLK/AG
50-413/85-29

Dear Dr. Grace:

Please find attached responses to Violation No. 413/85-29-01 and Violation No. 413/85-29-03, as identified in the above referenced inspection report.

Very truly yours,

H.B. Tucker

Hal B. Tucker

LTP:hrp

Attachment

cc: NRC Resident Inspector
Catawba Nuclear Station

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

Palmetto Alliance
2935½ Devine Street
Columbia, South Carolina 29205

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DUKE POWER COMPANY
CATAWBA NUCLEAR STATION

Violation:

10 CFR 50.54(q) requires that nuclear power reactor licensees follow and maintain in effect emergency plans which meet the requirements of Appendix E of the 10 CFR Part 50 and the planning standards of 10 CFR 50.47(b). Section 0 of the licensee's Emergency Plan delineated the training program for individuals assigned to the licensee's emergency organization.

Contrary to the above, the licensee in some cases assigned personnel to the onsite emergency organization prior to their receiving specified training. By comparing training records against past and proposed revisions to the Station Directive 3.8.4, the inspector identified 5 instances of this practice.

Response:

1. Duke Power Company admits the violation.
2. Catawba Nuclear Station emergency response personnel are provided training, as described in the Station Emergency Plan, in Station Directive 3.8.4, Onsite Emergency Organization and in Station Directive 2.5.2, Emergency Response Training. These documents stated that personnel are trained initially and on an annual basis, as was interpreted from the noted regulations. Our interpretation of the regulations was inaccurate. None of the documents stated that new or replacement individuals had to be trained prior to their being added to the emergency organization. We had conducted an initial training program prior to licensing of the plant and were holding annual retraining. Newly assigned Emergency Response members were being trained during the annual retraining classes.
3. Station Directive 3.8.4, Onsite Emergency Organization has been revised to specify that an individual may be added to the emergency organization only after the training is complete. All personnel who have not received training have been removed from the organization until they can receive the training.
4. Section 0 of the Catawba Nuclear Station Emergency Plan shall be revised to state that personnel must receive training prior to their inclusion in the Onsite Emergency Organization.
5. The corrective action in (3) is complete at this time and the action in (4) will be complete by October 1, 1985. Catawba will be in full compliance at that time.

Violation:

Technical Specification 6.8.1.d specifies that written procedures covering Emergency Plan implementation shall be established, implemented, and maintained.

Contrary to the above, the licensee did not implement procedure PT/O/B/4600/06, (Emergency Drills) which requires documentation of drill findings, in that the results of the semiannual health physics drill held on August 29, 1984, were not documented.

Response:

1. Duke Power Company admits the violation.
2. This violation resulted from the inexperience of the Station Emergency Planner in dealing with procedure documentation. This was the first time that PT/O/B/4600/06, Emergency Drills had been used, since the plant had just recently been licensed on July 18, 1984. The Health Physics drill was conducted on October 9 and 10, 1984 but was not included in the documentation.
3. PT/O/B/4600/06, Emergency Drills has been revised to include more direction on the documentation of drills.
4. Closer review and approval of completed procedures, in the future, will avoid further violations.
5. Catawba is in full compliance at this time.