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DUKE POWER

June 23, 1997

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Catawba Nuclear Station
Dockets 50-413 and 50-414
Reply to Notice of Violation (NOV)
Inspection Report 50-413, 414/97-07

Attached is Duke Energy Corporation's response to the two (2) Level IV violations cited in Inspection Report 50-413, 414/97-07 dated May 23, 1997. These violations were identified during inspections conducted between March 23, 1997, through April 26, 1997.

If there are any questions concerning this response, please contact K. E. Nicholson at (803) 831-3237.

Sincerely,

W. R. McCollum, Jr.

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xc: L. A. Reyes, Regional Administrator
P. S. Tam, ONRR
R. J. Freudenberger, SRI

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CATAWBA NUCLEAR STATION
REPLY TO NOTICE OF VIOLATION
413, 414/97-07-01

Notice of Violation

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 the performance of testing. Implicit in this requirement is the stipulation that the procedures be adequate for the circumstances.

Contrary to the above, on April 8, 1997, procedure PT/2/A/4200/01T, Containment Penetration Valve Injection Water System Performance Test, was inadequate in that procedure enclosures 13.3.1, 13.4.1, 13.21.1, and 13.22.1 directed operators to improperly sequence the valve manipulations to isolate containment penetrations M217, M218, M355, and M376 to support testing of component cooling water system containment isolation valves. Improper sequencing of valves to isolate and drain the containment penetrations resulted in loss of inventory of the cooling supply to the Unit 2 spent fuel pool cooling system.

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

CATAWBA NUCLEAR STATION
REPLY TO NOTICE OF VIOLATION
413, 414/97-07-01

Notice of Violation

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 the performance of testing. Implicit in this requirement is the stipulation that the procedures be adequate for the circumstances.

Contrary to the above, on April 8, 1997, procedure PT/2/A/4200/01T, Containment Peretration Valve Injection Water System Performance Test, was inadequate in that procedure enclosures 13.3.1, 13.4.1, 13.21.1, and 13.22.1 directed operators to improperly sequence the valve manipulations to isolate containment penetrations M217, M218, M355, and M376 to support testing of component cooling water system containment isolation valves. Improper sequencing of valves to isolate and drain the containment penetrations resulted in loss of inventory of the cooling supply to the Unit 2 spent fuel pool cooling system.

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

3. Corrective Action to be Taken to Avoid Future Violations

Other Operations procedures which have been converted from the Engineering format to the Operations format and have not been successfully performed under the new format, will receive formal validation of the technical adequacy. This commitment will be tracked as corrective action 1 in PIP 2-C97-1090 and will be completed by 10/05/97.

The purpose and importance of pursuing the "validation and verification" aspects of Qualification, Validation, and Verification (QV&V) when questions are raised during job performance, which will include reference to the requirement to "stop work when outside the box" as defined by the six tools for flawless human performance will be re-emphasized to all Operations personnel. This commitment will be tracked as corrective action 2 in PIP 2-C97-1090 and will be completed by 10/05/97.

The requirements and guidelines for draining systems as contained in Catawba Nuclear Site Directive (CNSD) 2.4.6 and in the 2EOC8 Radwaste Chemistry Outage Memorandum regarding drain evolutions will be re-emphasized to all Operations personnel. This commitment will be tracked as corrective action 3 in PIP 2-C97-1090 and will be completed by 10/05/97.

Operations will review the expectations for a pre-job briefing to ensure an appropriate level of detail for those briefings exists. This commitment will be tracked as corrective action 4 in PIP 2-C97-1090 and will be completed by 10/05/97.

4. Date of Full Compliance

Duke Energy Corporation is now in full compliance.

1. Reason for Violation

Duke Energy Corporation acknowledges this violation. This violation is attributed to an inadequate procedure which occurred when incorrect information contained in the Unit 1 Engineering procedure was converted into the Operations format. This information was not validated prior to creating both a Unit 1 and a Unit 2 Operations procedure. Thus, PT/2/A/4200/01T (Containment Penetration Valve Injection Water System Performance Test) provided incorrect valve manipulation sequences for each of the four component cooling (KC) containment penetrations. The procedure specifically directed the operators to open the inside containment drains prior to isolating the penetration. This created four, three-quarter inch flowpaths from the KC reactor building header to the containment floor and equipment sumps.

2. Corrective Actions Taken and Results Achieved

The KC system continued to drain until the KC surge tank low-low level setpoint was reached which automatically isolated the reactor building and auxiliary building non-essential headers. This automatic action isolated the KC penetrations, thereby terminating the loss of KC inventory.

The operators secured the 2A spent fuel pool cooling (KF) pump due to loss of KC cooling to the KF pump motor.

The operators entered AP/2/A/5500/21 (Loss of Component Cooling) and initiated makeup to the KC surge tank.

The valves opened to allow the inadvertent draining were closed and the auxiliary building non-essential KC valves were opened to allow restart of the 2A KF pump to restore spent fuel pool cooling.

Operations initiated Problem Investigation Process (PIP) 2-C97-1090 to capture the details of this event.

PT/2/A/4200/01T and PT/1/A/4200/01T which was also in error were revised to isolate the KC non-essential headers prior to draining the penetration. This was completed by the Change #44, Approved 04/15/97 on Unit 1, and Change #52, Approved 04/08/97 on Unit 2.

CATAWBA NUCLEAR STATION
REPLY TO NOTICE OF VIOLATION
413, 414/97-07-05

Notice of Violation

Technical Specification, Section 6.8.1.i, requires written procedures be established, implemented, and maintained covering the Fire Protection Program implementation.

The Quality Assurance program for fire protection is incorporated into the Duke Topical Report, Quality Assurance Program. Topical Report Section 17.3.1.6, Corrective Action, states that Duke Power has established a corrective action process whereby all personnel are to assure conditions adverse to quality are promptly identified, controlled, and corrected. In addition, Topical Report Section 17.3.2.13, Corrective Action, requires conditions adverse to quality be corrected, the cause of the condition determined, and action be taken to preclude repetition.

Contrary to the above, the suction screens for two of the three fire pumps were removed for repairs in 1991 and appropriate corrective action was not taken to restore the filter screens to meet the original design configuration. Specifically, the suction screens were not properly installed in the suction pit screen frame resulting in an area approximately 7 ½ x 11 feet at the base of the suction pit not being provided with protection to prevent raw lake water debris from entering the suction pit for two of the three fire pumps.

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

1. **Reason for Violation**

Duke Energy Corporation acknowledges this violation. This violation occurred as a result of failure to take prompt corrective actions to assure conditions adverse to quality were controlled and corrected.

On December 6, 1990, Engineering found the fire pump suction screens in a degraded condition and promptly wrote a Problem Identification Report (PIR) 0-C90-0357. The PIR system was the tracking tool (paper system) in use to document conditions adverse to quality to ensure corrective actions were taken to correct the deficiency. An operability evaluation was completed on December 10, 1990, which concluded that Fire Pumps "A" and "B" were operable without the screens in place.

On January 30, 1991, minor modification CE-3197 and associated Work Requests (WR) 3946NSM and WR 4192MES were originated to modify, refurbish, and replace the screens. The work request system in use at that time was also a paper tracking tool. Shortly thereafter, the hand-written work requests were placed into the Work Management System (WMS), an electronic tracking system, and tracked as WR 91001140 and WR 91002443. These WRs remained in the planning phase until March 25, 1992. On April 21, 1992, the WRs were placed on hold awaiting parts. From the planning phase to the time the WRs were placed on hold, other work items necessary for the implementation of the modification were being completed, which included blasting, coating, and fabrication of non-stock items. On January 27, 1994, these WRs were placed on the schedule and the actual work began on March 14, 1994. Another hold was placed on this work on September 7, 1994 for parts; work commenced again on December 13, 1994. Although the screens had been modified and refurbished in 1994, the electronic documentation in WMS indicated the screens had been installed incorrectly. It was further documented that a lifting device used for the refurbishment had to be located in order to properly reinstall the screens. Although no actual work was performed on the screens once the WMS identified that the screens had been installed, resources were devoted to locate or re-fabricate the lifting device in order to correctly re-install the screens. When the modification was documented as "labor complete" on April 17, 1995, the item no longer appeared as a backlog in WMS. This is attributed to the set-up of the WMS in that it does not recognize outstanding work once WOs are changed to a "labor complete" status.

In March of 1997, while preparing for the announced fire protection inspection, the fire protection engineer self-identified this condition which is documented in Problem Identification Process (PIP) 0-C97-1149.

2. Corrective Actions Taken and Results Achieved

The screens were properly installed to meet the original design requirements on May 17, 1997.

Resources within Work Control have been focused on the overall number and age of outstanding work orders to reduce the backlog. The total number of work orders (innage and outage) greater than one year old decreased from 652 on April 3, 1997, to 272 on June 23, 1997. Resources will continue to be devoted to reducing the overall backlog in order to achieve an internal goal of no innage corrective work orders greater than 180 days old remaining in the WMS.

3. Corrective Action to be Taken to Avoid Future Violations

No additional corrective actions will be taken.

4. Date of Full Compliance

Duke Energy Corporation is now in full compliance.