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DUKE POWER

July 19, 1990

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

Subject: Catawba Nuclear Station, Unit 1 and Unit 2
Docket Nos. 50-413 and 50-414
NRC Inspection Report No. 50-413, 414/90-11
Reply to a Notice of Violation

Gentlemen:

Enclosed is the response to the Notice of Violation issued June 22, 1990 by Alan R. Herdt concerning failure to establish documented instructions or procedures to ensure that movable lifting beams/chain hoists were secured as removed from the ice condenser as specified in the modification package, and plant drawings that did not reflect actual as built configurations.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Hal B. Tucker'.

Hal B. Tucker

MHH/VIOL9011/lcs

Attachment

xc: Mr. Stewart D. Ebnetter
Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta St., NW, Suite 2900
Atlanta, Georgia 30323

Mr. W. T. Orders
NRC Resident Inspector
Catawba Nuclear Station

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DUKE POWER COMPANY
REPLY TO A NOTICE OF VIOLATION
413, 414/90-11-01

10CFR50, Appendix B, Criterion V; Instructions, Procedures and Drawings; requires that activities affecting quality be prescribed by documented instructions, procedures, or drawings, appropriate to the circumstances and that these activities can be accomplished in accordance with these instructions, procedures, or drawings. These instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished. Implicit in these requirements are the requisites that these instructions, procedures and drawings be accurate, current, and reflect actual as-built conditions.

Contrary to the above:

- A) The licensee failed to establish documented instructions or procedures to ensure that movable lifting beams/chain hoists were secured in or removed from the ice condenser as specified in the modification package. On April 22, 1990, the beams were found unsecured above the intermediate deck doors in both units.
- B) On May 8, 1990, it was determined that plant drawings CN-2705-02.04.01 and CN-2705-02.04.02 did not reflect actual as-built configurations in that they showed that power existed to two breakers in Unit 2 power panels 2KXPA and 2KXPB when they were actually spares.

RESPONSE:

1. Admission or Denial of Violation

Item A. Duke Power admits the violation.

Item B. Duke Power admits the violation. However, this editorial discrepancy would not have caused any problem with proper plant operation.

2. Reasons for Violation if Admitted

Item A. There was a failure by Maintenance personnel to understand the requirement to securely locate the I-Beams/hoists established by the design engineering recommendations. As a result of this misunderstanding, no formal documentation was developed to control the I-Beam/hoists.

Item B. When Catawba Unit 2 design work was started, breakers 2KXPA-28 and 2KXPB-27 on Unit 2 were reserved for loads corresponding to the same breakers on Unit 1. Breaker assignments were normally made permanent when the engineering package was developed and the identifying cable number and cable size were added to the one line drawing. This did not occur with these breakers because they were not needed for the remaining design of the plant security system. Since the plant security system documentation is Safeguards Information it was not available to the engineer responsible for the breaker panels.

A security review of the Unit 2 one line drawings did not occur because all power requirements for the security system design were satisfied through Unit 1 breaker assignments.

Since the plant went into operation, procedures now require that the design for each unit is done independently and breakers are not reserved for future use. This prevents the same kind of discrepancy from occurring again with any kind of breaker assignment.

The A6, computer generated electrical load list contained discrepancies for exactly the same reasons as noted above. It is a computer tabulation of loads from the one line drawings and is supported by the same reference information.

This editorial discrepancy occurred primarily because it was a security related circuit and because of the resulting restrictions in the design process for handling Safeguards Information. However, an investigation was performed immediately after this discrepancy was identified and all plant breaker assignments feeding the security system on both units were verified to be correct and no similar discrepancies were noted. This was an isolated case due to unique circumstances and personnel responsible for the security equipment had proper information on Safeguards Information drawings identifying the actual power sources.

3. Corrective Actions Taken to Avoid Further Violations and Results Achieved

Item A. On 4/22/90 the I-Beams/Hoists were rolled to the ends of the ice condenser such that they were not directly above the intermediate deck doors.

On 4/23/90 the I-Beams/Hoists were securely located on the rails to prevent any movement. This was done in both units.

After securely locating the I-Beams/Hoists on 4/23/90 Catawba Nuclear Station was in full compliance with the design requirements.

- Item B. The A6 electrical load list has been revised to identify breakers 2KXPA-28 and 2KXPB-27 as spares.

A plant inspection was conducted and showed no other discrepancies in breaker assignments for security loads. A design review of the one line drawings and A6 electrical load list for the same loads also showed no other discrepancies.

A general overview confirmed that the normal process of checks and balances for one line drawings and the A6 electrical load list prevent this type discrepancy from occurring with non-security loads.

Duke Power is evaluating options for establishing more control of information in the A6 electrical load list.

4. Corrective Actions to be Taken to Avoid Further Violations

- Item A. At the conclusion of the Unit 2 EOC3 which is currently scheduled for September 1, 1990 the I-Beams/Hoists will be securely located on the rails as required by Design and documented on Work Request 6229SWR. (MES)

Standing Work Requests (SWR's) will be written by the Unit 1 EOC5 which is currently scheduled for March 5, 1991. These SWR's are to ensure the I-Beams/Hoists are securely located on the crane rails in Modes 1-4 and will be added to the Mode 4 checklist which is part of Operations Startup procedures OP/1,2/A/6100/01. (MES)

- Item B. Editorial corrections will be complete by 9/30/90 to show breakers 2KXPA-28 on drawing CN-2705-02.04-01 and 2KXPB-27 on drawing CN-2705-02.04-02 as spares. (Projects/Design)

5. Date of Full Compliance

Item A. Duke Power is now in full compliance.

Item B. Duke Power will be in full compliance by 9/30/90 when editorial changes to the subject one line drawings are completed.