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**DUKE POWER**

September 19, 1996

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, 414/96-10

Attached is Duke Power Company's response to the one (1) Level IV violation cited in Inspection Report 50-413, 414/96-10, dated August 23, 1996. This violation was identified during inspections conducted June 16, 1996 through July 27, 1996.

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

Sincerely,

A handwritten signature in dark ink, appearing to read 'W. R. McCollum, Jr.'.

W. R. McCollum, Jr.

\KEN:RESP96.10

xc: S. D. Ebnetter, Regional Administrator  
P. S. Tam, ONRR  
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**CATAWBA NUCLEAR STATION  
REPLY TO NOTICE OF VIOLATION  
413, 414/96-10-01**

**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.

Site Directive (SD) 3.3.6, Failure Analysis and Trending, revision 2, and IP/2/B/3121/11A, 11B, Calibration Procedure for Reactor Coolant System Hot Leg Pressure and Temperature Instrumentation, dated August 5, 1990, require notification actions if the as-found instrument condition exceeds specified out-of-tolerance criteria.

Contrary to the above, on July 10, 1996, an NRC inspector identified examples in which the licensee failed to implement procedures covering activities of RG 1.33, Appendix A. One example was documented in Maintenance Work Order 95062063-01, dated October 7, 1995, which identified that as-found conditions for the reactor coolant system pressure and temperature instruments exceeded the specified out-of-tolerance criteria of Procedures SD 3.3.6 and IP/2/B/3121/11A, 11B. The required notification actions were not accomplished.

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

CATAWBA NUCLEAR STATION  
REPLY TO NOTICE OF VIOLATION  
413, 414/96-10-01

**RESPONSE:**

**1. Reason for Violation**

Duke Power Company acknowledges this violation. The root cause of this violation is attributed to inadequate change management in the implementation of the out of tolerance reporting requirements for failure analysis and trending per Site Directive (SD) 3.3.6.

SD 3.3.6 defines Catawba's Failure Analysis and Trending System (FATS) program. This program is designed to gather data on plant equipment to be used in trending, identification of high failure rate equipment, and identification of repeat failures so that appropriate corrective actions may be initiated by the responsible equipment engineer. The program directs Maintenance personnel to enter codes for the as-found condition of components/loops during routine calibrations. This directive also requires that data sheets be forwarded to Engineering when components/loops exceed the Engineering notification criteria (two times the allowable tolerance or other value specified by the procedure). Although the requirement to forward data sheets to Engineering was included in Revision "0" of the directive, the emphasis of the directive and the initial training provided to Maintenance was focused on the proper entry of failure codes and data into the appropriate panels of the computer based Work Management System (WMS). Laminated copies of the data entry instructions as described in Attachment 3 to SD 3.3.6 were distributed to Maintenance personnel as the primary basis of the training package. This training aid did not include the requirement to forward the data sheets to Engineering.

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**2. Corrective Actions Taken and Results Achieved**

Problem Investigation Process (PIP) report 0-C96-1761 was initiated on 07/12/96 to document the problems identified by the inspector and list additional examples identified by the licensee. An evaluation of the out of tolerance conditions was conducted and no operability concerns were identified.

Several issues related to the implementation of the FATS program and the reporting of Out of Tolerance (OOT) situations had been identified by the licensee prior to this NRC inspection. The examples cited in the violation occurred prior to the implementation of the initiatives undertaken by the licensee to correct these problems.

- A communication package was sent to Maintenance personnel on 04/25/96 to provide specific guidance on the requirements, expectations, and methods of reporting OOT situations.
- Training on the proper methods of FATS data entry was delivered to key maintenance teams who perform I&C work during May and June of 1996 through a joint effort between Maintenance and Engineering. This training was developed and delivered by a group consisting of Maintenance and Engineering personnel formed to assess and recommend enhancements to the FATS data entry process.

The work packages containing the problems which were identified by the NRC inspector and the licensee were performed in the time frame of June, 1994 through October, 1995. This was prior to the implementation of the corrective actions discussed above. The corrective actions which have already been taken are sufficient to keep Catawba's current program in full compliance.

**CATAWBA NUCLEAR STATION  
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**3. Corrective Action to be Taken to Avoid Future Violations**

A joint assessment of the FATS program and the reporting of OOT situations will be conducted by Maintenance and Engineering during the fourth quarter of 1996. This assessment will focus on the requirements of data entry and the disposition of the OOT sheets. The assessment will be assigned to IAE and CERN to be completed by 12/15/96, with completion of this commitment documented in corrective action #8 (IAE) and #9 (CERN) of PIP 0-C96-1761.

To assure continued compliance, Maintenance will develop and implement procedural guidance to ensure that the reporting of OOT conditions to Engineering is performed in a consistent manner for maintenance work orders. Implementation of this action may prove to be a significant scope of work. It is expected that the review and revision of all Instrument and Electrical procedures will be needed to complete this action. This activity will be assigned to IAE to be completed by 08/01/97, with completion of this commitment documented in corrective action #10 of PIP 0-C96-1761.

**4. Date of Full Compliance**

Duke Power Company is now in full compliance.