

CATEGORY 1

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SUBJECT: Forwards response to NRC 960520 ltr re violation noted in insp repts 50-269/96-04, 50-270/96-04 & 50-287/96-04 on 960310-0420.C/A: properly updated all CR drawings on 960403.

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DUKE POWER

June 20, 1996

U.S. Nuclear Regulatory Commission
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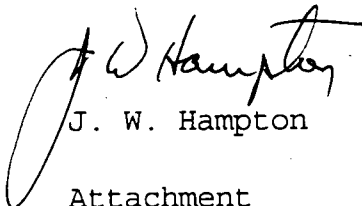
Subject: Oconee Nuclear Site
Docket No. 50-269, -270, -287
Inspection Report 50-269, -270, -287/96-04
Reply to Notice of Violation

Dear Sir:

By letter dated May 20, 1996, the NRC issued a Notice of Violation which was identified by an NRC inspection that was conducted from March 10 - April 20, 1996.

Pursuant to 10 CFR 2.201, Attachment 1 provides a written reply to the Notice of Violation identified in the subject inspection report.

Very truly yours,


J. W. Hampton

Attachment

cc: Mr. S. D. Ebnetter, Regional Administrator
U.S. Nuclear Regulatory Commission, Region II

Mr. D. E. LaBarge, Project Manager
Office of Nuclear Reactor Regulation

Mr. P. E. Harmon
Senior Resident Inspector

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Attachment 1
Reply to Notice of Violation
Violation 96-04-03 Severity Level IV

Restatement of the violation

10 CFR 50 Appendix B, Criterion V, Instructions, Procedures, and Drawings, as implemented by Duke Power Company Topical Report Quality Assurance Program (Duke-1-A), requires that activities affecting quality shall be prescribed by documented procedures and activities shall be accomplished in accordance with these procedures.

Oconee Station Directive 2.1.3, Control of Nuclear Station Modifications, dated November 1, 1994, requires that Vital to Operations (VTO) drawings be completed and distributed following completion of the modification.

Contrary to the above, on March 25 - April 5, 1996, activities affecting quality were not accomplished in accordance with prescribed procedures or instructions in that on March 29, 1996, VTO drawing O-803, Elementary Electrical Diagram, AC Circuits 230 KV Switchyard, PCB's 26 & 27, revision 10, in the Unit 1, 2, and 3 Control Rooms had not been updated from modification NSM 52875, which had been completed in October 1994. Approximately 10 VTO drawings and 24 non-VTO drawings related to NSM 52875 had not been updated.

1. The reason for the violation:

Duke Power Company acknowledges the violation.

Upon completion of Nuclear Station Modification 52875, 34 drawings were issued on transmittal #19,991. Of these 34 drawings, 10 drawings were VTO drawings. During an October 1995 internal audit, Document Management personnel identified that the drawings which were associated with NSM 52875 had not been updated in several satellite file locations. Document Management personnel performed an audit of all file locations that are on distribution to receive

the drawings. It was determined that the modification drawing transmittal, which was dated October 19, 1994, had not been processed for six satellite file locations. An investigation of the failure to process the transmittal could not determine a cause for the unprocessed transmittal. All file locations were updated with the correct revision of the modification drawings except for the files located in the Control Room files which only contain VTO drawings.

When the satellite file locations were updated after the internal audit, the Control Room files were not updated by Document Management because the affected drawings were not recognized as VTO drawings. Oconee has a group of approximately 50 drawings that are identified as VTO drawings but the drawing numbers are not consistent with other drawings that are VTO drawings. For example, Oconee electrical elementaries have a drawing number with a prefix of OEE and all OEE drawings are known to be VTO drawings. However, drawing O-803-D is an electrical elementary drawing that does not have the OEE prefix. For NSM 52875, the affected VTO drawings did not include any drawings that would have been easily identified as VTO drawings. This led Document Management to conclude that the Control Room files did not need to be updated following the internal audit and is, therefore, determined to be a contributing cause to the violation.

2. Corrective steps taken and results achieved:

All Control Room drawings were properly updated on April 3, 1996.

3. The corrective steps that will be taken to avoid further violations:

- a) To aid in identification of VTO drawings, the drawings that are not clearly recognized as VTO drawings by their drawing number will be labeled with large letters (VTO) close to the title block.
- b) In addition to the actions in 3a above, a 100% audit will be completed on all satellite drawing

file locations by January 31, 1997. The results of this audit will be evaluated by Document Management to determine if additional corrective actions are necessary.

4. The date when full compliance will be achieved:

Duke Power is in full compliance. The corrective steps described in Section 3 will ensure that all drawings (VTOs and non-VTOs) are maintained at the correct revision levels.