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SUBJECT: Responds to NRC 970127 ltr re violations noted in insp repts 50-269/96-17, 50-270/96-17 & 50-287/96-17. Corrective actions: Pressure Test Requirement Form has been created to communicate required post-maintenance test method.

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DUKE POWER

March 12, 1997

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Subject: Oconee Nuclear Site
Docket Nos. 50-269, -270, -287
Inspection Report 50-269, -270, -287/96-17
Reply to Notice of Violation

Gentlemen:

By letter dated January 27, 1997, the NRC issued three Notices of Violation as described in Inspection Report No. 50-269/96-17, 50-270/96-17, and 50-287/96-17.

Duke Power responded by letter dated February 26, 1997, to two of the three violations. Regarding the remaining violation, Duke was granted a 15 day extension to complete the detailed root cause investigation.

This violation involves the examination of ASME Code Class 3 welds on Low Pressure Service Water piping. Duke Power acknowledges this violation. Accordingly, Duke is proposing corrective actions, as described in the attachment, to address the root cause.

Pursuant to the provisions of 10 CFR 2.201, Attachment 1 provides a written response to the subject violation as identified in the subject Inspection Report.

Very truly yours,

J. W. Hampton

IE01

Attachment

cc: Mr. L. A. Reyes, Regional Administrator
U. S. Nuclear Regulatory Commission, Region II

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

Mr. M. A. Scott
Senior Resident Inspector
Oconee Nuclear Site

Attachment 1
Reply to Notice of Violation (Reply)
Violation 50-269/96-17-09

Restatement of the Violation

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

Oconee Station Procedure QAL-5, Table C, Rev. 0, requires that ASME Code Class 3 welds, tested per ASME Code Case N-416-1, in lieu of the hydrostatic pressure test required by paragraph IWA-4000, shall have surface examinations performed on the root and final pass. Also, following the examination and prior to or immediately upon returning to service, a visual examination (VT-2) shall be performed in conjunction with a system leakage test, at normal operating pressure and temperature.

Contrary to the above, on October 17, 1996, activities affecting quality were not accomplished in accordance with prescribed procedures. Specifically, eight new Code Section XI Class 3 welds that were fabricated during Nuclear Station Modification (NSM) 52972, Low Pressure Service Water "B" Line Header modification did not undergo surface examination at the root and final pass as required.

Reply to the Notice of Violation

1. The reason for the violation:

Duke Power acknowledges the violation. As is described in the February 26, 1997, submittal, ONS chartered a detailed investigation to find the root cause of the missed NDE inspection.

A 24" branch connection was installed on the LPSW "B" Line Header per NSM ON-52972. The boundary from the process piping through LPSW-940 to LPSW-139 is ASME Code Class 3.

Attachment 1
Reply to Notice of Violation (Reply)
Violation 50-269/96-17-09

In the development of the modification test plan, it was determined that a hydrostatic pressure test could not be performed since the weld repair area could not be isolated. Therefore, Code Case N-416-1 was invoked. Code Case N-416-1 can be used in lieu of hydrostatic pressure testing, provided the NDE is performed per the 1992 Edition of ASME Section III. The NDE required for the root and final pass was documented on the Weld Process Control Sheet.

These NDE requirements were later deleted from the Weld Process Control Sheet. Interviews by the root cause analysis team with personnel involved two years ago with the 1995 event could not recall why the NDE was removed. The decision to not use N-416-1 was not reviewed, documented or approved by Engineering.

The cause of the missed NDE inspection has been determined to be that the removal of the NDE requirements of Code Case N-416-1 from the Weld Process Control Sheet was not adequately communicated. There was no evidence that the change was verified or validated by the IA or the Test Engineer. A contributing cause was the lack of a formal program for transferring testing information from the IA to QA Welding Technical Support and to Engineering relating to alternate NDE on weld process control.

Although not part of the violation, Inspection Report 96-17 also describes that the hydrostatic test did not meet code requirements. The root cause analysis team also evaluated the less than adequate test pressure of the hydrostatic test. The root cause was human error in the pressure calculation because of inadequate self-checking. Management has communicated the requirements for self-checking by the preparer and by the reviewer to ensure the accuracy of calculations.

2. The corrective steps that have been taken and the results achieved:

- On October 24, 1996, Engineering performed an operability evaluation on the welds performed during ON-52972 and concluded that they are capable of performing their intended safety function. However, the welds were not meeting ASME code requirements. A condition of operability was imposed that the units remain below 250°F and no fuel loading or refueling operations could occur until the welds were tested or repaired if necessary.

- On December 26, 1996, TN/0/A/9749/MM/01M, "Procedure to install MM ONOE-9749 and Hydro Test a Portion of LPSW Piping," was performed which installed a Marbo Plug in the "B" LPSW header. The installation of the Marbo Plug allowed the subject welds to be tested hydrostatically per code requirements. The successful performance of the hydrostatic test verifies that the subject welds are capable of performing their intended safety function.

- A detailed root cause investigation was performed. The results of the root cause investigation will be addressed by a site Quality Improvement Team (QIT).

- Management has communicated to QA Welding Technical Support and Engineering the appropriate process and responsibilities for implementing special code case requirements.

- A Pressure Test Requirement Form has been created to communicate the required post-maintenance test method. This form is routed by the IA to Engineering and QA Welding Technical Support.

- A change has been made to the Weld Process Control Sheet to document the use of Code Case N-416-1 in lieu of hydro.

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

A QIT will be formed to address the area of post-maintenance testing from a site perspective. Representatives from Engineering, Maintenance and QA Technical Support will combine efforts to improve the post-maintenance testing program.

Results from the QIT will be evaluated and implemented, as appropriate, to improve the post-maintenance testing program.

4. The date when full compliance will be achieved:

Oconee Nuclear Station is in full compliance.