



Duke Power Company
A Duke Energy Company

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W. R. McCollum, Jr.
Vice President

July 1, 1998

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, -287/98-05
Reply to Notices of Violation

Gentlemen:

By letter dated June 1, 1998, the NRC issued two Notices of Violation as described in Inspection Report No. 50-269/98-05, 50-270/98-05, and 50-287/98-05.

Duke Energy Corporation (Duke) accepts these violations. As described in the attachments, Duke is proposing corrective actions to address the root causes of the violations.

Pursuant to the provisions of 10 CFR 2.201, the attachments provide written responses to the subject violations as identified in the subject Inspection Report.

Corrective actions in Section 3 of each response are the only regulatory commitments in this submittal.

Very truly yours,

W. R. McCollum, Jr.
Site Vice President
Oconee Nuclear Station

Attachments (2)

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NRC Document Control Desk

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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 98-05-01

Restatement of the Violation

10 CFR 50, Appendix B, Criterion XVI, Corrective Action, requires that measures be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.

Contrary to the above, between March 14, 1996, and April 1, 1998, the licensee failed to correct a condition adverse to quality in that repetitive examples of a failure to perform a quality assurance review prior to issuance of engineering instructions occurred. Specifically, the licensee identified three temporary modifications and twelve minor modifications, which were approved during that period, with engineering instructions that did not receive the required quality assurance review prior to issuance.

Reply to the Notice of Violation

Duke Power acknowledges the violation.

1. The reason for the violation:

On April 1, 1998, Duke identified, from the Problem Investigation Process (PIP), a number of minor and temporary modifications that had occurred over a two year period where the Engineering Division had failed to obtain Quality Assurance (QA) Group signatures. PIP 98-1682 was written to identify a potential adverse trend indicated by the PIP search.

Prior to PIP 98-1682, the PIPs in question were treated as isolated incidents where no programmatic changes were required due to the lower significance of the event. The identification of the emerging trend should have been followed by an investigation to determine if it was adverse. The root cause of the violation is inattention to detail. The guidelines for the trending of PIP data were new and in the process of being implemented.

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- a) Nuclear System Directive (NSD) 223, Trending of PIP Data, was communicated to PIP Coordinators during the April 1998 training. The directive outlines management expectations as to the periodic, structured evaluation of data from the Problem Investigation Process (PIP) database.
- b) The work group trend evaluator is responsible for trending those PIPs initiated by the group or where the group was assigned as culpable.
- c) During the root cause investigation, each PIP was reviewed to ensure weaknesses and expected performance was accurately assessed.
- d) As of June 25, 1998, all Engineering personnel have received instructions concerning the required quality assurance review per the modification process.

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

As an enhancement to the program, the Engineering Instruction sheet is being revised to require a review by the modification's qualified reviewer as to whether a QA review is required. In addition, a place for a QA signature is being added to the form.

4. The date when full compliance will be achieved:

Duke is in full compliance.

Attachment 2
Reply to Notice of Violation (Reply)
Violation 98-05-04

Restatement of the Violation

10 CFR Part 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances, and shall be accomplished in accordance with these instructions, procedures, or drawings.

Contrary to the above, as of February 11, 1998, approved Quality Assurance Piping Layout configuration control drawings were not followed in that the installed Unit 2 plant vent airborne particulate and iodine sampler radiation indicating alarm (RIA-43, RIA-44) inlet sample line was not constructed following bend radius as specified in drawing O-440A, Revision 37 and O-440B, Revision 38, Piping Layout Plan - Elevation 838'-0" Auxiliary Building, dated October 9, 1970.

Reply to the Notice of Violation

Duke Power acknowledges the violation.

1. The reason for the violation:

Background information: A work history review was performed and it was determined that no changes have been made to this inlet sample line tubing since installation; therefore, the violation occurred during installation. The modification which installed this tubing was NSM-22422. The procedure used to install the tubing was TN/2/A/2422/0/AK1, Revision 1, and step 8.10.3 of this procedure required that the tubing to 2RIA-43 thru 46 be installed per design drawing O-440C. This work was performed between October 13, 1990 and October 19, 1990. By researching the drawing archives, it was determined that limited edition drawing O-440C, Revision B, was the approved drawing at the time of this activity. When the as-built drawings were released after NSM-22422 was complete, the tubing layout for 2RIA-43 thru 46 was removed from the limited edition drawing O-440C, Revision B, and was placed on drawings O-440A, Revision 32, and O-440B, Revision 34. This is why these design drawings are referenced in the violation statement.

There are two causes for this violation. The root cause is the drawing used for installation, O-440C Revision B, did not

Attachment 2
Reply to Notice of Violation (Reply)
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clearly state where tubing bends were required. Note 1 on this drawing stated "Where tubing bends are used, they must be 5 dia. bends or greater"; however, the drawing did not indicate where this note applied. The drawing did not state that all tubing had to be bent or that elbows were not allowed. It could have been interpreted by the field installer that the note only applied if it was decided to use bends instead of elbows. The individual involved in this activity is no longer employed by the company, so it is not possible to interview this person for their interpretation of this note. The application of note 1 on drawing O-440C should have been clearer to avoid this potential misinterpretation.

A contributing cause is the individual installing the tubing did not adequately review or question the information on the installation drawing. As previously stated, the individual involved in this activity is not available to be interviewed. However, a tubing expert on site was interviewed regarding this situation. This individual stated that it was inappropriate to assume that elbows were allowed and that the individual should have clarified the application of note 1 on O-440C with the design engineer before using elbows. Based on this information, the individual involved in this activity should not have assumed how this note applied without questioning the design engineer.

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

- a) When the as-built drawings were released after NSM-22422 was complete, the tubing layout for 2RIA-43 through 46 was placed on drawings O-440A, Revision 32 and O-440B, Revision 34. Sufficient detail was added to O-440A and O-440B to show where tubing bends were required. This eliminated the potential for misinterpretation which existed on the limited edition drawing O-440C.
- b) The inlet sample line for the Unit 2 plant vent airborne particulate and iodine radiation monitors (2RIA-43, 2RIA-44) was replaced February 19, 1998, with tubing constructed with the proper bend radius. The sample line now meets the requirements specified in design drawings O-440A and O-440B.

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- c) The inlet sample lines for all other particulate and iodine monitors were inspected for similar problems. No other problems were found.
 - d) Current Duke guidance on having a questioning attitude is emphasized.
3. The corrective steps that will be taken to avoid further violations:
- No additional corrective actions are required to prevent further violations.
4. The date full compliance will be achieved:
- Oconee Nuclear Station is in full compliance.