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SUBJECT: Documents discrepancies & correctives actions performed re violations noted in insp repts 50-269/98-01 & 50-287/97-12. Communication deficiency prevented violation response from being revised to reflect actual conditions.

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W. R. McCollum, Jr.
Vice President

January 13, 1999

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, 50-270, 50-287
Response to Violation 50-269/98-01-02
Response to Violation 50-287/97-12-05

During a recent document review, Duke identified that actions specified in two Violation responses were not as described. The purpose of this letter is to document the discrepancies and the corrective actions as performed.

The November 5, 1997, response to Violation 50-287/97-12-05 stated that a detailed root cause analysis was performed for the event. A review of Problem Investigation Process (PIP) 3-097-2730 revealed that an apparent cause was performed rather than a detailed root cause. The difference in the two is the amount of effort and time required to perform the investigation.

The second issue was contained in Duke's April 17, 1998, response to Violation 50-269/98-01-02. A corrective action was listed as being completed when, in fact, it was not completed until eight weeks after the response was issued. The response stated that Maintenance Procedure MP/O/A/1800/014 had been revised. The review identified that MP/O/A/1800/014, Valves and Piping - Welded - Removal and Replacement - Class A Through F, Revision 28 was not issued until June 11, 1998. An investigation identified that the 10 CFR 50.59 evaluation for the procedure revision was first performed on March 14, 1998, and then again on June 11, 1998. Duke determined that Maintenance made a decision to place an Administrative Hold on the procedure until the completion of an upcoming refueling outage. It was felt that the timing was not propitious as the issuance of a procedure revision might cause confusion during an outage. It was also felt that the current revision at the time was adequate if the prescribed guidance was utilized. Maintenance failed to notify Regulatory Compliance of the procedure hold. The communication deficiency prevented the Violation response from being revised to reflect actual conditions.

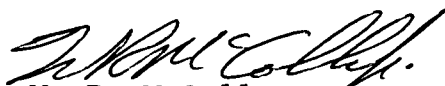
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Please address any questions to Ed Burchfield at 864-885-3292.

Very truly yours,


W. R. McCollum, Jr.
Site Vice President

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January 13, 1999
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