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DUKE POWER

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November 19, 1990

Mr. Stewart D. Ebnetter
Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta Street, N.W. Suite 2900
Atlanta, Georgia 30323

Subject: Oconee Nuclear Station
Docket Nos. 50-269, 50-270, 50-287, 72-4
NRC Inspection Report Nos. 50-269/90-24, 50-270/90-24,
50-287/90-24, 72-4/90-24
Systematic Assessment of Licensee Performance (SALP)

Dear Sir:

By letter dated October 3, 1990, you transmitted the initial SALP report for the Oconee facility, considering the period from February 1, 1989, to July 31, 1990. A verbal presentation of that report was made in a public meeting on October 18, 1990, at the Oconee site.

Although I am generally pleased with the report, I would like to comment and provide additional information regarding Maintenance / Surveillance and Safety Assessment / Quality Verification (Attachments 1 & 2). I request that you reconsider the ratings for these Functional Areas.

I have intentionally kept this response brief. Please contact me, or members of my staff, if further information is needed.

Very Truly Yours,

A handwritten signature in cursive script that reads 'M. S. Tuckman'.

M. S. Tuckman, Vice President
Nuclear Operations

TDC/salpl

cc: Mr. P. H. Skinner
NRC Resident Inspector
Oconee Nuclear Station

Mr. D. B. Matthews
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I am disappointed in the SALP rating for this area. Substantial improvements since to the last SALP should be recognized, as should upgrades to Oconee's maintenance facilities and programs during this SALP period. Surveillance activities appear to deserve greater weighting. The consistency of the rating should be reviewed, considering the size of the Oconee operation, which includes four NRC-licensed facilities, and the quality of Oconee's programs relative to those of other licensees.

The report notes that five violations in the M/S area occurred during the assessment period, none involving civil penalties. It should also be noted that this is a significant decrease from the 13 violations during the previous period. Duke's internal problem resolution process reflects improvement which correlates with the decrease in violations. The number of Maintenance Group-related problems leading to Problem Investigation Reports dropped from 89 during the previous period to 29 in this period.

Some concern over maintenance work practices and management control over non-station maintenance workers is reflected in the report. I agree that we must continue to improve in these areas, but some of the events leading to this concern appear to have been misinterpreted. Of four reactor trips which the report attributes to poor maintenance work practices, other causes were reported for two (LERs 287/90-01 & 02). An event involving polar crane operation over the refueling canal is attributed to problems with CMD workers, which is inconsistent with the conclusions in LER 287/89-06. An unexpectedly negative interpretation of an event is that associated with Transmissions Department control of relay settings (LER 269/90-05). Incorrect settings occurred in 1982 and were corrected in 1984, so this problem should not affect the current SALP rating. In this assessment period, programmatic changes to prevent recurrence were begun.

In regard to the relationship of maintenance practices to reactor trips, it should be recognized that Oconee participates in the B&W Owners' Group Safety and Performance Improvement Program (SPIP), which places emphasis on this area. An NRC Audit Team evaluated Oconee's implementation of SPIP recommendations in February of 1990. The audit report has not been issued, but the results stated in the exit meeting were excellent. There were no findings or followup items.

On the point of management control over work by non-station Duke employees, the report does mention a training program which is improving CMD workers' performance. There is a strength of Duke's program, related to this discussion, which appears to have been overlooked. Work performed by our CMD crews, such as plant modifications and maintenance during outages, is contracted to vendors by many other nuclear utilities. Because CMD workers are Duke employees, management control is maintained, and development activities such as the CMD training program are taking place.

Not discussed in the report were many upgrades to facilities and programs which reflect Duke's commitment to maintenance activities at Oconee. Following are a few examples of enhancements made during this SALP period.

Engineering Staff Augmentation

Five engineers were added to the Maintenance I&E Engineering staff.

Training and Qualifications Upgrades

The Mechanical Maintenance Section completed an upgrade of its Employee Training and Technical Qualifications System, and a new training program in Maintenance Engineering now qualifies each engineer to an assigned area.

Facilities Upgrades

Significant additions and improvements to maintenance facilities are listed below.

- o Mechanical Maintenance Shop upgrade, with addition of a Procedure Review Room and Predictive Maintenance Lab
- o Addition of a Clean Calibration Lab
- o Upgrade of the Contaminated Calibration Lab
- o Welding Shop addition and equipment upgrade
- o Addition of two new I&E shops
- o Upgrades to both Maintenance Tool Rooms, including installation of computerized (bar code) compact storage bins
- o Decontamination of work areas in the Contaminated Tool Room

QA Surveillance Feedback

A program was established to monitor QA rejections of maintenance work. Feedback has contributed to a continuing decline in rejections.

PM-2 (Predictive Maintenance Program)

This rotating equipment predictive maintenance program was formalized.

Valve Operator Testing and Evaluation System (VOTES)

Use of VOTES equipment for MOV setup and testing began (related to Generic Letter 89-10).

Reactor Coolant Pump Motor Replacement/Refurbishment

Periodic replacement of one RCP motor per refueling outage was begun. The old motors are refurbished during non-outage periods.

Power Group Scaffolding Program

This new program is enhancing scaffolding quality and worker safety.

Tooling Modernization

New tools include a laser alignment system for rotating equipment and automated pipe cutting and beveling equipment. Both improve quality and reduce stay times in radioactive environments.

Material Condition Upgrade

The Maintenance Group led a program to apply non-outage work force to upgrade plant material conditions, including painting components and structural steel, reinsulating piping, labelling, and decontamination.

In summary, I feel that improvements in problem areas should be acknowledged, that continuing problems may be overstated, and that substantial upgrades to maintenance facilities and programs should receive greater recognition. Improvements can and will be made in our Maintenance/Surveillance activities, as we continue to strive for excellence. Our current program is one of the best, however, and it deserves the highest SALP rating.

ATTACHMENT 2
SAFETY ASSESSMENT / QUALITY VERIFICATION (SA/QV)

I believe the assessment in this area attempts to accurately describe our overall performance. However, I believe the final conclusion does not reflect a balanced assessment of all activities encompassed by this area.

Quality verification activities noted as strengths in other Functional Areas (Engineering/Technical Support, Emergency Preparedness, Security and Safeguards) should also be included in the assessment of the SA/QV area. I also note that the Fitness for Duty Audit, which was conducted generically at all Duke locations from April 9 through May 28, 1990, and was identified as a strength by the NRC in Inspection Report 50-413, -414/90-20 dated August 28, 1990, is not recognized in the Oconee SALP report.

Two licensing activities, Erosion/Corrosion Induced Pipe Wall Thinning and Safety-Related Motor-Operated Valves Testing and Surveillance, were considered as strengths in the Maintenance/Surveillance area. They should also be considered as examples of high quality responses to Generic Letters 89-08 and 89-10, respectively, in the SA/QV area.

A strength noted in the SA/QV area was the addition of an SRO licensed individual to the station Quality Assurance organization. An SRO licensed engineer was added to the station Compliance group during the assessment period, so that two SRO licensed individuals are now dedicated to this area. This should also be recognized as a strength in the station's NRC licensing area.

Licensing activities which involved other areas of the NRC (ISFSI Licensing pursuant to 10 CFR 72, station blackout submittal pursuant to 10 CFR 50.63, response to Bulletin 88-11, Pressurizer Surge Line Thermal Stratification) were conducted in a high quality and timely fashion, based on feedback from the NRC. It is not apparent that these activities were considered in this SA/QV assessment.

Past licensing performance continues to influence the assessment of present performance. Long-standing licensing activities, such as ATWS and ICC technical specifications, were acceptably resolved by the combined effort of both of our staffs during this assessment period. The resolution of several long-standing items during this assessment period should be considered to be a strength in the Safety Assessment area.

There were many bulletin and generic letter responses submitted by Duke which were considered by the NRC to be of high quality and needing little, if any, follow-up. In addition, several of these responses were prepared as generic Duke submittals which made NRC review more efficient. These licensing activities, upon which Duke spent considerable effort, should also be considered as strengths.

In summary, my assessment of our performance in the overall area of SA/QV is that significant improvements have been made. Feedback from Duke/NRC interface meetings, as well as from others in the NRC, has indicated that improvements in this area are apparent. I believe the SALP report should acknowledge and reflect our improving performance in Safety Assessment/Quality Verification.