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AUTH.NAME AUTHOR AFFILIATION
HAMPTON,J.W. Duke Power Co.
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SUBJECT: Responds to NRC 930713 ltr re SALP Repts 50-269/93-11, 50-270/93-11 & 50-287/93-11 for period of 920201-930501. Requests that docket number assigned to ISFSI be added to final SALP rept.

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(803)885-3499 Office
(803)885-3564 Fax

DUKE POWER

August 18, 1993

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

Subject: Oconee Nuclear Site
Docket Nos. 50-269, -270, -287; 72-4
Inspection Report 50-269, -270, -287/93-11
Systematic Assessment of Licensee Performance

Gentlemen:

By letter dated July 13, 1993, the initial SALP report for the Oconee facility was issued. This report covered the time period of February 1, 1992 through May 1, 1993. A verbal presentation of that report was made in a public meeting on July 28, 1993 at the Oconee site.

I would like to comment and provide additional information regarding the Operator Training assessment (Attachment 1), the Engineering assessment (Attachment 2), and the Maintenance/ Surveillance assessment (Attachment 3). I request that these comments be considered for inclusion into the final SALP report and rating.

In addition, I request that the Docket Number assigned to the Independent Spent Fuel Storage Installation be added to the final SALP report.

Please contact me, or members of my staff, if further information is needed.

Very truly yours,

J. W. Hampton

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1/1

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

Mr. L. A. Wiens, Project Manager
Office of Nuclear Reactor Regulation

P. E. Harmon
Senior Resident Inspector
Oconee Nuclear Site

ATTACHMENT 1
OPERATOR TRAINING AREA
ENGINEERING/TECHNICAL SUPPORT

The "Summary of Results" section of the preliminary SALP report indicates that "performance in the operator requalification program declined from the previous assessment due to weaknesses in examination content and evaluator techniques."

In Section V.B of the report, Direct Inspection and Review Activities, it is listed that two initial and three requalification examinations were conducted at Oconee. Our records indicate that one initial exam (50-269/93-300, January 1993) and two requalification exams (50-269/92-302, July 1992; 50-269/93-300, January 1993) were administered during the SALP cycle.

The following information is taken from the above referenced Examination Reports. Duke Power believes the Operator Training Program has shown continuous improvement during this SALP period.

A. NRC Examination Report 50-269/92-302

In July, 1992, the NRC administered a requalification examination. Nine of ten Reactor Operators (RO) and thirteen of fourteen Senior Reactor Operators (SRO) passed the examinations.

Based upon these results, the Oconee Requalification Program was determined to be satisfactory. A strength was noted in the construction and maintenance of Job Performance Measures.

Weaknesses were noted in the areas of written examination construction, communications during Emergency Operating Procedures implementation, and evaluator performance.

B. NRC Examination Report 50-269/93-300

In January, 1993, the NRC administered initial written examinations and operating tests to seven SROs. Requalification simulator retake examinations were administered to the RO and SRO who failed the July, 1992 test.

All seven SRO candidates passed the initial examinations and both requalification retake examinees passed. The examiners stated that "both of the operators exhibited noticeably improved performance compared to their former examination results".

Strengths identified were "instructor assistance during exam administration, communications and team interaction, and an improved crew command and control structure."

ATTACHMENT 1
OPERATOR TRAINING AREA
ENGINEERING/TECHNICAL SUPPORT

B. NRC Examination Report 50-269/93-300 (continued)

It was also noted in the report that Oconee had "conducted an extensive pre-examination review ... and was successful in significantly reducing the number of post examination comments compared to previous examinations."

The examiners stated that the previous examination linked many weaknesses to poor communications and command and control. These problems were effectively addressed by management as can be seen in the following statements made by the examiners; "The candidates displayed excellent communication skills and team work between each other, especially during plant transients. The use of formalized repeat back communications and operator involvement in the decision making process was noteworthy."

In addition, the command and control structure was changed such that the Unit Supervisor is in an oversight position. This improved method of command and control revealed none of the problems mentioned during the previous examination. The examiners observed that "communications were clear, concise, and formal" and identified the new structure as a strength.

Duke Power believes the Operator Training Program has improved and requests that the NRC review this information for inclusion in the final SALP report and rating. Duke also requests the NRC to verify that only Operator Examinations which took place during the SALP cycle are included in the report.

ATTACHMENT 2
ENGINEERING AREA
ENGINEERING/TECHNICAL SUPPORT

Section V.A, Licensee Activities, of the SALP report discusses problems that were encountered with the LPSW system. The report states that "...cooling water flow of the LPSW system through the LPI heat exchangers were found to exceed the manufacturer's specifications. The power level of both units was reduced to approximately 10 percent and modifications were made to reduce the flow through the heat exchangers to meet the manufacturer's specifications."

Duke Power would like to clarify this information. The cooling water flow of the LPSW system through the heat exchangers, during a postulated design basis accident, could have potentially exceeded the manufacturer's specifications. This was discovered on a test performed on Unit 3 and was also determined to be applicable to Units 1 and 2.

Section F of the SALP report contains information on the Engineering/Technical Support area. The first paragraph on page 15, item (5) lists a failure to correct the MG-6 testing deficiency after identification during Keowee Unit 2 testing. The specific MG-6 problem was promptly corrected. A comprehensive program is underway to deal with MG-6 concerns and is part of the Emergency Power Management Plan.

The second paragraph on page 15 discusses the EDSFI report. Duke Power requests that additional, pertinent information from the EDSFI cover letter (ref: 50-269,270,287/93-02) be included in this writeup. The second paragraph of the EDSFI cover letter indicates that "this comprehensive inspection revealed no inoperable systems and provided adequate assurance that the Electrical Distribution System will perform as intended pending further analysis and testing by the licensee".

The last paragraph of Section V.A, Licensee Activities, in the SALP report discusses the October, 1992 loss of off site power event. This should read, "On October 19, 1992, during maintenance activities, a loss of off site power occurred for Unit 2 which was followed by a subsequent loss of one of the Keowee Hydro units."

A June, 1992 management meeting which was held at NRC headquarters on Station Blackout and Keowee issues should be added to Section V.D, Management Conferences.

ATTACHMENT 3
MAINTENANCE/SURVEILLANCE

Section C contains information on the Maintenance/Surveillance area. The second paragraph on page 10 discusses the test program for Keowee Hydro. The report states that "... relays required to isolate portions of the switchyard and to transfer Keowee auxiliary power to an alternate source were not fully tested".

Duke Power would like to clarify this information. The need for these tests had been previously identified by our Design Basis Documentation program. Duke Power was awaiting testing procedure development; complexity of the test and an extensive 50.59 evaluation precluded earlier testing.

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