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DUKE POWER

September 2, 1988

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

Subject: **Oconee Nuclear Station**
Docket Nos. 50-269, -270, -287
Inspection Report 50-269, -270, -287/88-13

Gentlemen:

Please find attached a response to the subject Notice of Violation dated August 3, 1988. Section 3.g.(2) of the inspection report discusses observations made of control room demeanor by the inspection team. Duke Power Company feels compelled to comment on this observation due to the seriousness of this topic. As explained in our Management Meeting in Atlanta on June 7, 1988, investigations were conducted by plant management into the allegations of the inspectors after the inspection by interviews of plant employees. Nothing of substance was identified which would lead to the comments in this inspection report nor would interfere with plant operations.

Prior to the Management Meeting, a call was made by the Station Manager to the team leader to confirm which day the alleged events occurred. During the Management Meeting, the inspection team could not identify the crews or time frame involved, which would enable station management to further follow-up on the alleged incidents. It was also identified by the inspectors that there was not a problem with demeanor in the control room, through numerous subsequent observations by the inspectors, even though plant management did not alert the control room crews to the alleged observations.

Region II Management was informed of the philosophy of professionalism required of the Operations staff at Oconee and the frequent monitoring performed of the control room operations by Station Manager, Operations Superintendent, Operating Engineers, Shift Engineers and others. Through numerous audits conducted by INPO, NRC, insurance companies, Quality Assurance, and others we have never had a concern regarding control room demeanor raised. Therefore, the comments in this inspection report are not considered reflective of the actual conduct in our control rooms. Control

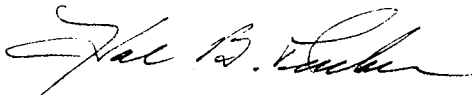
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room demeanor is a very important and serious issue at all Duke Power Company Nuclear Stations, and any comments made regarding this topic are treated accordingly. Continued NRC assistance in assuring that comments in this area are appropriate and complete is greatly appreciated.

Very truly yours,



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PJN/381/mmf

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Duke Power Company
Oconee Nuclear Station
Reply to a Notice of Violation
NRC Inspection Report 50-269, -270, -287/88-13

Violation A

10CFR50.9(a) states that information required by the Commission's regulations, to be maintained by the licensee, shall be complete and accurate in all material respects.

1. Contrary to the above, information required by the Commission's regulations to be maintained by the licensee was not accurate in all material respects, in that, on May 11, 1988, a Performance technician performing PT 2/A/0150/22A, Operational Valve Functional Test, falsified the stroke time recorded in Step 12.16.4 for valve 2 LWD-1.
2. Contrary to the above, information required by the Commission's regulations to be maintained by the licensee was not accurate in all material respects, in that, on May 19, 1988, the NRC identified 5 examples in 28 hours where nuclear equipment operator logs documented fire patrols that were not performed.

This is a Severity Level IV violation (Supplement VII).

Response

1. Admission or denial of the violation.

The violation is admitted as stated.

2. The reason for the violation.

This violation occurred primarily due to personnel error on the part of the Performance technician performing PT 2/A/0150/22A and the Nuclear Equipment Operators assigned to perform the fire watch tours.

3. The corrective steps which have been taken and the result achieved.

As outlined in a letter dated July 7, 1988 from H.B. Tucker (Duke) to Virgil L. Brownlee (NRC/Region II) corrective disciplinary action was taken in each case. Each case was reviewed by Duke Power Company Management. It was determined that these incidents were isolated events and a widespread problem did not exist.

Duke Management has distributed memos to all employees re-emphasizing the requirements for accuracy in record keeping.

4. The corrective steps which will be taken to avoid further violations.

As for the performance test falsification of records, this item is considered completed with the corrective action already taken. However, Duke will continue to monitor completed test data for accuracy. Concerning the missed firewatch tours, corrective action was identified in Licensee Event Report 269/88-07 submitted on July 6, 1988 that should preclude recurrence.

5. The date when full compliance will be achieved.

Duke Power Company feels it is in compliance with the regulations at the present time; however, all corrective action identified in LER 269/88-07 will be complete by January 31, 1989.

Violation B

Units 1, 2, and 3 Technical Specification section 4.0.4 states the in service testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10 CFR 50, Section 50.55a (g) (4), to the extent practicable.

The 1980 ASME Boiler and Pressure Vessel Code, Section XI, Rules for In service Inspection of Nuclear Power Plant Components, Article IV-3412, Exercising Procedure, requires that valves tested under this section be full-stroke exercised. Article IWV-3413, Power Operated Valves, defines full-stroke time as that time interval from initiation of the actuating signal to the end of the actuating cycle.

Contrary to the above, the licensee did not measure the full-stroke exercise time during in service testing. The licensee routinely measured the time between actuations of the limit switches (light to light) as opposed to the time interval from initiation of the actuating signal (by switch) to the end of the actuating cycle (light indication) as required.

This is a Severity Level IV violation (Supplement I).

Response

1. Admission or denial of the violation.

Duke Power admits that the violation occurred as stated.

2. The reason for the violation.

In the past, Oconee and the NRC position on measuring stroke timing valves was to measure light-to-light instead of actuation-to-light. This position was taken since valve degradation was what we were looking for. Further, it was believed the intent of the code requirement was met using this method. For many years, we have used the light-to-light method and were audited on several occasions with no concerns expressed from the NRC. Further evidence of the fact that this was the NRC position is that another Duke Plant's SER was approved using the light-to-light method. The NRC position has changed and we are changing our program in response.

3. The corrective steps which have been taken and the results achieved.

The Oconee Inservice (IST) Program is being revised to require timing actuation-to-light for valve stroke timing test.

4. The corrective steps which will be taken to avoid further violations.
Not applicable.
5. The date when full compliance will be achieved.

Baseline data is being collected and all valves will be stroke tested using the actuation-to-light method during the next refueling outage for each unit ending with the Unit 2 End of Cycle 10 Refueling Outage scheduled for June-July, 1989.

Violation C

Unit 1, 2, and 3 Technical Specification 4.0.4 states the in service testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10CFR50, Section 50.55 a(g) (4), to the extent practicable.

The 1980 ASME Boiler and Pressure Vessel Code, Section XI, Rules for Inservice Inspection of Nuclear Power Plant Components, Article IWV-1100 and IWV-1400, state that each valve used for mitigating the consequences of an accident and tested in accordance with the ASME requirements, shall be categorized and listed in plant records.

Contrary to the above, the licensee did not identify and therefore did not categorize or list in plant records, valves required to be tested in accordance with ASME requirements. Valves LPSW-772, LPSW-773, and LPSW-774 which are containment isolation valves and HP-98, which provides HPI pump suction header train separation, were not included in the ASME Section XI valve stroke testing program. These examples are not intended to be all inclusive.

This is a Severity Level IV violation (Supplement I).

Response

1. Admission or denial of the violation.

The violation is admitted for valve HP-98 only. Valves LPSW-772, LPSW-773, and LPSW-774 operate in conjunction with their associated Reactor Building Cooling Unit (RBCU) Service Water Supply Valves (LPSW-16, LPSW-19, and LPSW-22), and they share the same containment penetrations as their associated RBCU Service Water Return Valves (LPSW-18, LPSW-21, and LPSW-24). None of the valves mentioned above are required to be leak tested since RBCU service water flow must be assured to mitigate the consequences of an accident. This complies with Oconee FSAR Sections 3.8.1.7.4 and 6.2.3.1.

Valves LPSW-772, LPSW-773, and LPSW-774 isolate flow to a radiation monitor to detect RBCU tube ruptures. They are not required for operation of the RBCU's and thus need not be exercise tested as are the RBCU supply and return valves.

It should be noted that normally open manual valves LPSW-241, LPSW-242, and LPSW-243 (not solenoid valves LPSW-772, LPSW-773, and LPSW-774 are the first isolation valves outside containment for their associated penetration.

2. The reason for the violation.

Valve HP-98 was omitted from the IST Program through oversight.

3. The corrective steps which have been taken and the results achieved.

Valve HP-98 is being added to the valve testing procedure. Other valves in similar situations have been reviewed. No other omissions were identified.

4. The corrective steps which will be taken to avoid further violations.

No further corrective action is planned at this time.

5. The date when full compliance will be achieved.

Valve HP-98 will be tested on each unit at the next available Cold Shutdown Outage and not later than the Unit 2 End of Cycle 10 Refueling Outage scheduled for June-July, 1989.

Violation D

10CFR50, Appendix B, Criterion V, and the licensee's accepted Quality Assurance Program (Duke-1-A Amendment II) Section 17.2.5 require that activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with these procedures.

1. Station Directive 3.2.1, Work Request, revised February 18, 1988, provides instructions for initiating Maintenance Work Request. The instructions state that the QA condition, retest requirement, and functional verification sections shall be completed/indicated as required.

Contrary to the above, the QA condition, retest requirement, and functional verification sections were not completed/indicated as required for Work Request 14665, Loop B Feedwater Valve Delta Pressure Instrument Repair. These and other sections were not completed as required. In addition, 44 other work requests were found to be incomplete.

2. Maintenance Directive 3.2.5 Maintenance Housekeeping Program, Revised May 6, 1988, required Level IV cleanliness be maintained in the reactor protection and engineered safeguards cabinets.

Contrary to the above, Level IV cleanliness was not maintained in the reactor protection and engineered safeguards cabinets. On May 21, 1988, NRC inspectors found a spit cup, apple core, and various other debris in the cabinets.

This is a Severity Level IV violation (Supplement I).

Response

1. Admission or denial of the violation.

The violation is admitted as stated.

2. The reason for the violation.

- a. A new work request form has been implemented which added and/or changed several of the Section II blocks. All personnel had not been adequately trained on these changes.

- b. Planning/Scheduling personnel had all received on-the-job training but some had not completed all classroom training on proper planning and scheduling techniques and requirements.
 - c. Inadequate monitoring of work requests for quality.
 - d. Inadequate housekeeping program implementation.
3. The corrective steps which have been taken and the results achieved.
- a. Classroom training for all Planning and Scheduling personnel on work request planning and scheduling has been conducted.
 - b. Training for selected personnel on backshifts has been conducted to improve quality on high priority work requests.
 - c. An improved monitoring program for work request quality has been implemented.
 - d. Station Directive 3.2.1 (Work Request) has been revised to reflect the requirements for the new work request form.
 - e. All instrument cabinets received thorough inspection and cleaning.
 - f. All personnel performing housekeeping inspections received additional instructions on how to inspect and what cabinets are included.
4. Corrective steps which will be taken to avoid further violations.

Planning and Scheduling will perform periodic audits to verify adherence to the work request program.

Work request preparation training will be given to all Operations Supervisors and Radwaste Supervisors to help improve the total work request program.

5. The date when full compliance will be achieved.

Duke Power Company feels we are in compliance with the regulations at the present time; however, all planned training programs identified above will be completed by November 1, 1988.

Violation E.1

10 CFR 50.59(a) (1) allows the holder of a license authorizing operation to make changes to the facility as described in the safety analysis report without prior Commission approval, unless the proposed change involves a change in the Technical Specifications incorporated in the license or an unreviewed safety question. In addition, 10 CFR 50.59(b) (1) states that the licensee shall maintain records of changes in the facility as described in the safety analysis report. These records must include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question.

1. Contrary to the above, multiple alarm and setpoint changes made during 1987 and 1988 included determinations that unreviewed safety questions were not documented.

A typical example included changing the level alarm in the Spent Fuel Storage Pool from .5 to .7 feet of water column on May 4, 1987. This example is not intended to be all inclusive.

This is a Severity Level V violation (Supplement I).

Response

1. Admission or denial of the violation:

This violation is admitted as stated

2. Reason for violation.

Setpoint changes are processed by the procedure major change form. Prior to June 1, 1988 the safety evaluation done on this form consisted of your questions to screen for 10CFR 50.59 applicability including:

Involves an unreviewed safety question;

Requires completion of a Nuclear Safety Evaluation Checklist.

The alarm and setpoint changes referenced in the Inspection Report included safety evaluations which complied with the program in place at that time. Subsequently, the 10CFR 50.59 review for procedure changes were determined to require enhancement.

3. Corrective steps which have been taken and the results achieved:

As of June 1, 1988 all procedure changes (including alarm and setpoint changes) have been performed in accordance with the enhanced program. Specifically, more detailed information is provided concerning the determination that unreviewed safety questions are not involved.

4. Corrective steps which will be taken to avoid further violations:

Procedure changes will be performed in accordance with the enhanced program.

5. Date of full compliance:

June 1, 1988

Violation E.2

10CFR50.59(a) (1) allows the holder of a license authorizing operation to make changes to the facility as described in the safety analysis report without prior Commission approval, unless the proposed change involves a change in the

Technical Specifications incorporated in the license or an unreviewed safety question. In addition, 10 CFR 50.59(b) (1) states that the licensee shall maintain records of changes in the facility as described in the safety analysis report. These records must include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question.

2. Contrary to the above, exempt changes (a change to structures, systems, or components that does not require the level of approvals, reviews, schedules, or documentation as a station design modification or a Design Engineering designed modification) used for valve replacements, included determinations that unreviewed safety questions were not involved; however, the bases for these determinations were not documented.

Typical examples include OE-1350, -1218, -1352, -1355, -1347, and -1607. These examples are not intended to be all inclusive.

This is a Severity Level V violation (Supplement I).

RESPONSE:

1. Admission or denial of the violation:

Duke Power Company denies the violation.

2. Basis for denial:

Paragraph 5.b of the Inspection Report contains two lists of exempt changes pertaining to valve replacements. As stated in the Inspection Report Those in the first list were determined by site personnel to not involve an unreviewed safety question; however, they did not have a 10CFR50.59 evaluation performed, nor a documented basis other than a generic statement that the replacement component met or exceeded original design specifications and that that the component had been reviewed by Design Engineering (DE)."

Duke Power Company performed a review of the aforementioned exempt changes. Contrary to Paragraph 5.b, a 10CFR50.59 evaluation had been performed for all exempt changes listed. Further, NRC guidance on 10CFR50.59 contained in the Inspection and Enforcement Manual (Part 9800 CFR Discussions, 1/1/84) states that "(m)aintenance activities which ... replace components with replacement parts procured to the same (or equivalent) purchase specification, do not require a written safety evaluation to meet 10CFR50.59 requirements." For the listed exempt changes this provided the basis for screening from the detailed unreviewed safety question evaluation as allowed by Duke Power Company administrative controls governing 10CFR50.59. Justification provided with the exempt changes, although brief, was sufficient to meet the Nuclear Station modification (NSM) Manual, Appendix E guidance. Recent training should upgrade the quality of the written justifications.

Paragraph 5.b of the Inspection Report identifies the second list of exempt changes as those which "the licensee determined... required a 50.59 evaluation and determined that an unreviewed safety question was not involved, but did not include the bases for the determination that an unreviewed safety question was not involved." Contrary to Paragraph 5.b, the bases for the determination that an unreviewed safety question was not involved was included for all exempt changes listed. In addition, upon further review, the listed exempt changes were determined not to meet the 10CFR50.59 screening criteria for a detailed unreviewed safety question evaluation based on NRC guidance in the Inspection and Enforcement Manual. Thus, the justification provided, although brief, was based upon a conservative interpretation of Duke administrative controls governing 10CFR50.59 and was therefore above and beyond 10CFR50.59 requirements.