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SUBJECT: Revised response to NRC 881028 ltr re violation noted in Insp Repts 50-269/88-28, 50-270/88-28 & 50-287/88-28.

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DUKE POWER

December 1, 1988

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

Subject: **Oconee Nuclear Station**
Docket Nos. 50-269, -270, -287
IE Inspection Report 50-269/88-28, -270/88-28 and 50-287/88-28
Reply to Notice of Violation, Revision

Gentlemen:

By letter dated October 28, 1988 Duke Power Company submitted a reply to the subject Notice of Violation. As discussed with the NRC Resident Inspector, please find attached a revision to the reply. Changes are indicated by a vertical line in the right margin.

Very truly yours,

Hal B. Tucker

PJN/435/nmf

Attachment

xc: Mr. M.L. Ernst
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ATTACHMENT

DUKE POWER COMPANY
OCONEE NUCLEAR STATION
REPLY TO NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS. 50-269, -270, -287/88-28

Violation 287/88-28-01, Severity Level IV

Oconee Nuclear Station Technical Specification 6.4.1 states that the station shall be operated in accordance with approved procedures. OP/3/A/1102/10 Enclosure 4.2, Hot Shutdown Conditions to 250 Degrees/350 PSI Conditions, step 2.8 requires the closing or verifying closed 3HP-27.

Contrary to the above, on August 12, 1988, 3HP-27 was not closed as required by OP/3/A/1102/10 resulting in a violation of Technical Specification 3.1.2.9, low temperature overpressure protection, for a period of 8 minutes.

Response

1. Admission or denial of the violation:

Duke Power Company agrees that procedure OP/3/A/1102/10 was violated, resulting in a degradation of Low Temperature Overpressure Protection as required by T.S. 3.1.2.9. Although the action statement in T.S. 3.1.2.9 was met, T.S. 6.4 was violated when the procedure was not followed.

2. The reason for the violation if admitted:

Failure of personnel to properly perform substep 1 of step 2.9 of Enclosure 4.2, Hot Shutdown Conditions to 250 Degrees/350 PSI Conditions in OP/3/A/1102/10, Controlling Procedure for Unit Shutdown. This step calls for the closing and verification of closing 3HP-27. Although this step was signed as completed and verified by two Control Room Operators, an investigation showed that 3HP-27 was never closed. Personnel error on the part of the doer and verifier of this step is the reason for the violation.

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

After the Operations Management investigation determined that personnel errors were the cause of this incident, corrective disciplinary action was taken against these individuals for Violation of Work Rules in which they were counselled for proper use of procedures, verification requirements, and Control Room board walkdowns.

The procedure was looked at to determine if the step was understandable and conformed to the writers' guide. No procedure changes were recommended.

These individuals now have a reinforced understanding of the need to perform procedures correctly and to properly implement the independent verification process.

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

This incident was covered during Crew Meetings with the Shift Operating Engineer stressing the importance of procedural adherence, independent verification requirements, and control board walkdowns. These topics have been covered with all Operations shifts.

This incident was covered with the Shift Supervisors during a Shift Supervisor's meeting.

5. Date when full compliance will be achieved:

All actions described have been completed.

Violation 287/88-28-02, Severity Level IV

Oconee Nuclear Station Technical Specification 6.4.1 states that the station shall be operated and maintained in accordance with approved procedures and that these procedures shall contain appropriate check-off lists and instructions.

Contrary to the above, PT/3/A/610/01H, Emergency Power Switching Logic Standby Breaker Closure Channel A&B test procedure did not contain appropriate instructions in that during conduct of the test a complete loss of all AC power occurred resulting in a violation of Technical Specification 3.8.3 which requires at least one low pressure injection pump and cooler to be operable.

Response:

1. Admission or denial of the alleged violation:

Duke Power Company admits the violation of Technical Specification 3.8.3 occurred as stated above due to the loss of power.

2. Reason for violation:

The control power fuses for Unit 3 Main Feeder Bus 1 supply from transformer CT3 should have been tagged for the EPSL test conditions.

Also, the Operations supervisors involved in the test failed to communicate the EPSL test requirement of control power fuses removal to a non-licensed operator.

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

PT/3/A/610/01H was changed to require tags, describing test requirements, to be placed on removed control power fuses prior to resuming the test. The EPSL test was completed with no additional problems.

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

The ONS Performance section will review each Oconee unit's test procedures that require removal of breaker control power and include the tagging requirement.

An Operations supervisor will hold a pre-job briefing with Operators and other appropriate personnel prior to initiating complex procedures. The briefing will include a discussion of test or maintenance procedure conditions that vary from normal plant conditions and the expected results. Methods of how to restore acceptable plant conditions if expected results occur will also be discussed.

All Operations supervisors and Control Room Operators will receive instructions from Operations management concerning the content of pre-job briefings.

5. Date of full compliance:

Performance procedure reviews and changes will be completed prior to the next refueling outage for each Oconee unit.

Operations supervisors and control room operators instructions will be completed by December 31, 1988.