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50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287
AUTH.NAME AUTHOR AFFILIATION
TUCKER,H.B. Duke Power Co.
RECIP.NAME RECIPIENT AFFILIATION
Ofc of Enforcement (Post 870413)

SUBJECT: Responds to NRC 881213 ltr re violations noted in Insp Repts 50-269/88-25,50-270/88-25 & 50-287/88-25.

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RIDS/ADDS

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DUKE POWER

January 12, 1989

Director, Office of Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Document Control Desk

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270 and -287
Inspection Report Nos. 50-269/88-25, 50-270/88-25, 50-287/88-25
Reply to Notice of Violation

By a letter from M. L. Ernst dated December 13, 1988, the NRC transmitted a Notice of Violation and proposed imposition of civil penalty for a violation reported in NRC Inspection Reports 50-269/88-25, 50-270/88-25 and 50-287/88-25. In accordance with 10CFR 2.201, I am submitting Duke's response to the Notice of Violation (Attachment 1). I have also enclosed a check for the amount of Twenty Five Thousand Dollars ($25,000) as payment for the civil penalty imposed.

I would like to acknowledge the efforts and support provided by the NRC Resident Inspectors at Oconee in assisting in the recognition and resolution of the problem. Through their efforts, we were able to identify additional enhancements to our procedure to assure operability of the piggyback mode of operation.

I declare under penalty of perjury that the statements set forth herein are true and correct to the best of my knowledge.

Very truly yours,

H. B. Tucker

PFG22.D1/lcs

IE14
1/1
w/check #25,000
#745310

cc: Mr. M. L. Ernst
Acting Regional Administrator
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Ms. Helen Pastis
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ATTACHMENT 1
DUKE POWER COMPANY
OCONEE NUCLEAR STATION

Violation

Technical Specification 6.4.1.k. requires that the station be operated and maintained in accordance with approved procedures and that written procedures with appropriate check-off lists and instructions be provided for the long-term emergency core cooling systems. Procedures shall include provision for remote or local operation of system components necessary to establish high and low pressure injection within 15 minutes after a line break.

Contrary to the above, prior to May 19, 1988, adequate instructions were not provided for long-term emergency core cooling systems, specifically the High Pressure Injection (HPI) system. Plant personnel did not recognize the HPI piggyback mode as a required safety-related operational mode of the ECCS under certain conditions and, therefore, procedures did not provide adequate guidance regarding the utilization of the HPI piggyback mode to mitigate certain small break LOCAs. Because the operating procedures did not provide precautions or specific limitation regarding system equipment, certain permitted combinations of reactor building spray, low pressure injection and high pressure injection flow could have resulted in a loss of net positive suction head to the HPI system pumps resulting in the HPI sump recirculation mode not fulfilling design requirements. Adequate procedures, including guidance for operation of the LPI/HPI crossover valves, were not fully implemented until August 19, 1988.

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

Civil Penalty - ($25,000).

Response

(1) Admission or Denial of the Violation

The violation is correct as stated. The violation was previously reported as LER 269/88-06.

(2) Reasons for the Violation If Admitted

As stated in the Notice of Violation, the reason for this violation was a failure to initially provide adequate design documentation for the HPI piggyback mode of operation. The original design assumptions and system operating procedures were written which did not take into account System design limitations. This contributed to a lack of emphasis on the requirements of this mode of operation being placed in the Oconee Technical Specifications and in the Operator Training Program. As a result, station personnel incorrectly understood the piggyback mode to be one of several options available, rather than as a required mode to assure compliance with 10CFR 50.46 criteria.

(3) Corrective Steps That Have Been Taken and Results Achieved

(A) Write and distribute operational guidance providing the operators with the additional precautions and limitations to maintain adequate NPSH to the HPI pumps if they should be required to operate in the piggyback mode;

(B) Revise appropriate operating procedures when the acceptability of manual-local operability of valves LP-15 and LP-16 was identified to ensure the opening (electrical or manual-local) of valves LP-15 and LP-16 prior to Reactor Building Emergency Sump recirculation;

(C) Locally cycle Valves LP-15 and LP-16 to verify manual-local operability;

(D) Issue an operations Training Package (HPI) Piggyback Operation) to delineate the Limiting Conditions for Operation for valves LP-15 and LP-16, as well as corrective actions;

(E) Revise the Oconee Nuclear Station Emergency Procedure Guidelines to incorporate the additional precautions and limitations;

(F) Revise the appropriate operating procedures to incorporate the additional precautions and limitations to maintain adequate NPSH to the HPI pumps operating in the piggyback mode.

(G) Issue an operations Training Package to all Oconee Operations personnel regarding emergency operating procedure changes and the Justification for Continued Operation;

(H) Issue Technical Specification Interpretation regarding specification 3.3.1

(I) Revise Emergency Operating Procedures on August 19, 1988 to provide guidance for opening valves LP-15 and LP-16, at a Borated Water Storage Tank level of ten (10) feet, in preparation for operation in the HPI piggyback mode. This guidance will allow additional time for manual-local valve operation, should it be required;

(J) Reissue the LPI system manual operability test on August 30, 1988 to include testing of valves LP-15 and LP-16.

(K) Cover the Oconee Operations Training Package (HPI) Piggyback Operation) in the 1988 Segment #5 licensed operator requalification.

(L) Revise the License Preparatory Senior Operator and License Preparatory Reactor Operator lesson plans to emphasize that the HPI piggyback mode is required for mitigation of certain sizes of small break LOCAs. This revision will include the failure mode and consequences of this scenario. Simulator exercise guides will be revised to describe any limitations that may be seen on the simulator in regard to this scenario.

(M) Revise Segment #7 or #8 of licensed operator simulator requalification to include a simulator exercise in which the piggyback mode of operation is required for small break LOCA mitigation. This will serve to further emphasize this operating mode to all licensed operators.

The above corrective actions assured that adequate procedures were in place, with specific provisions, guidance, and limitation, to fully assure operation of the HPI system in the piggyback mode of operation. Further, training programs were enhanced which will assure that operations personnel will continue to understand the importance of this mode of operation as well as, when and how to use this mode of operation.

(4) Corrective Steps Which Will Be Taken to Avoid Further Violations

(A) Review to verify the operability of all valves which are required to be available to change position in the Emergency Core Cooling System. This will include verifying that these valves are properly addressed in the Oconee Technical Specifications. This review will be completed with particular attention to the requirements of 10 CFR 50.46.

(B) Submit an amendment request to the NRC to Revise Oconee Technical Specifications section 4.5.1.2.2 to include the manual testing requirements of valves LP-15 and LP-16 and the results of the review of ECCS valves.

(5) Date When Full Compliance Will Be Achieved

All corrective actions noted in (4) above will be completed by February 28, 1989.