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DUKE POWER

ay 4, 1989

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, -287/89-08

Gentlemen:

By a NRC letter dated April 4, 1989, a notice of violation and Inspection Report 50-269, -270, and 287/89-08 was transmitted to me. As required by 10 CFR 2.20, I am submitting a written response to the violation identified in the inspection report.

Very truly yours,

Hal B. Tucker

RRE/41/td

Attachment

cc: Mr. S. D. Ebneter
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, NW, Suite 2900
Atlanta, GA 30323

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

Mr. D. B. Matthews Office of Nuclear Regulation U. S. Nuclear Regulatory Commission Washington, DC 20555

VIOLATION (#269/89-08-02), SEVERITY LEVEL (IV)

Technical Specification 6.4.1 requires that the station be operated and maintained in accordance with approved procedures. Administrative Policy Manual (APM) Section 3.2. Testing, Section 3.2.3.3, Performance of Testing, states in part, that testing associated with QA Condition 1 systems and components shall be performed in accordance with written procedures using Temporary Test Procedures.

Contrary to the above, on January 16, 1989, APM 3.2.3.3 was not followed in that a test was performed on the 1B High Pressure Injection Pump motor without using an approved Temporary Test procedure resulting in placing the plant in an unanalyzed electrical power configuration.

This is a Severity Level IV Violation (Supplement I) and applies to Unit 1 only.

RESPONSE:

1. Admission or denial of the alleged violation:

Duke Power Company admits the violation.

2. Reason for violation:

This was a one-time only test and not intended to be repetitive in nature. The intent was to swap power for one HPI pump to the auxiliary servicewater switchgear and determine how long this action may take under emergency conditions.

The violation occurred for two reasons as follows:

- A. The Operations Staff did not provide a specific procedure for the test to be performed. Instead, the Operations Engineer instructed the Unit Supervisor to use portions of two existing procedures to perform the task.
- B. The Unit Supervisor, who was familiar with the task, decided to not use the two procedures offered, but to perform the test from memory.

- [3. The corrective steps which have been taken and the results achieved:
 - This violation has been discussed with both the Operations Staff Engineers and the Unit Supervisor involved. Temporary operating or test procedures are normally provided by the staff to the supervisors. The staff has been reminded that closer involvement during such tests may prevent recurrence. The Unit Supervisor was reminded that strict procedural adherence is expected.
- 4. Corrective steps which will be taken to avoid further violations:

 No further corrective action is planned.
- 5. Date of full compliance:

All corrective actions were completed by March 1, 1989.