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 50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287

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 TUCKMAN, M.S. Duke Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 910716 ltr re violations noted in insp repts
 50-269/91-12, 50-270/91-12 & 50-287/91-12. Corrective actions:
 flow transmitter 2FT-4A valved into svc & verified operable
 by performing Procedure PT/2/A/0203/6A.

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DUKE POWER

August 13, 1991

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Inspection Report 50-269, -270, -287/91-12
Reply to Notice of Violation

Dear Sir:

By letter dated July 16, 1991, the NRC issued Inspection Report Nos. 50-269/91-12, 50-270/91-12 and 50-287/91-12 with a Notice of Violation. Pursuant to the provisions of 10 CFR 2.201, I am submitting a written response to the violations identified in the above Inspection Report.

Very truly yours,

M. S. Tuckman, Vice President
Nuclear Operations

RRE192/wp

cc: Mr. S. D. Ebnetter
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VIOLATION (#270/91-12-01), SEVERITY LEVEL (IV)

Technical Specification 6.4.1 requires that the station be operated and maintained in accordance with approved procedures.

Station Directive 2.2.2, Independent Verification, states that independent verification applies to the removal from operability and restoration to operability of all components which affect the ability of a system to perform a safety related function.

Maintenance Directive 7.5.3, Work Request Implementation, requires that opening/closing of instrument valves be documented and independently verified.

Contrary to the above, Unit 2 was not operated and maintained in accordance with approved procedures in that, on May 30, 1991, Low Pressure Injection flow instrument 2FT-4A was found isolated during a pump performance test. The instrument had been independently verified as being returned to service after calibration approximately one week earlier.

RESPONSE:

1. Reason for the violation, or if contested, the basis for disputing the violation:

This violation occurred during the transfer of information from a working copy of the instrument procedure to a clean copy. I&E technicians apparently overlooked the fact that this transmitter was not documented as "Returned to Service", and in fact had not been returned to service.

2. Corrective steps that have been taken and the results achieved:

Flow transmitter 2FT-4A was valved into service and verified operable by performing procedure PT/2/A/0203/6A.

3. Corrective steps that will be taken to avoid further violations:

Guidelines are being developed to formalize methods for transfer of information from one copy of the procedure to another (for both contaminated and clean copies). These guidelines will be communicated to all I&E personnel.

4. Date when full compliance will be achieved:

Guidelines will be communicated to all I&E personnel before December 31, 1991.

VIOLATION (#287/91-12-02), SEVERITY LEVEL (IV)

Technical Specification 6.4.1 requires that the station be operated and maintained in accordance with approved procedures and that the procedures contain appropriate check off lists and instructions.

Operations Management Procedure 1-9, Use of Procedures, Section 6.3 requires that no deviation from the original intent of the procedures shall be allowed without an approved procedure change.

Contrary to the above, Unit 3 was not operated and maintained in accordance with approved procedures in that, on May 25, 1991, during the performance of Operating Procedure OP/3/A/1104/01, Core Flooding System, to makeup to the "B" Core Flood Tank, the procedure could not be performed as written and a procedure change was not initiated or approved prior to sluicing the "A" Core Flood Tank to the "B" Core Flood Tank which deviated from the intent of Operating Procedure OP/3/A/1104/01.

RESPONSE:

1. Reason for the violation, or if contested, the basis for disputing the violation:

The intent of OP/3/A/1104/01 is to provide the operator with guidance to allow him to maintain the Core Flood Tanks within operational and Technical Specification limits. Therefore, the operators felt that the actions they took in sluicing water from one Core Flood Tank to another in order to keep both tanks within limits did not violate the intent of the procedure.

The fact remains that the operators took actions to sluice water from one Core Flood Tank to the other without an approved procedure. This does violate Technical Specification 6.4.1. The reason for the violation was a judgmental error by the Shift Supervisor. The Shift Supervisor made the decision to perform this evolution based on experience.

2. Corrective steps that have been taken and the results achieved:

An operability evaluation was performed which considered the configuration in which the transfer was made from the '3A' to the '3B' Core Flood Tank through the sample line. This evaluation determined that the '3B' Core Flood Tank was operable during the event.

Procedure OP/1,2,3/A/1104/01 was revised to provide guidance for the operator to perform this evolution; the revision was approved July 31, 1991.

VIOLATION RESPONSE
287/91-12-02 (continued)

The Shift Supervisor involved in this event was counseled regarding the necessity of operating the station in accordance with approved procedures. In addition, the responsibility for operating the station by use of approved procedures was reinforced with all of the station Operations Shift Supervisors.

3. Corrective steps that will be taken to avoid further violations:

The corrective actions which have been taken are sufficient to prevent recurrence of this event.

4. Date when full compliance will be achieved:

All corrective actions were completed before August 5, 1991.