

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9203230257 DOC. DATE: 92/03/17 NOTARIZED: NO DOCKET #
FACIL: 50-269 Oconee Nuclear Station, Unit 1, Duke Power Co. 05000269
50-270 Oconee Nuclear Station, Unit 2, Duke Power Co. 05000270
50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287

AUTH. NAME AUTHOR AFFILIATION
HAMPTON, J.W. Duke Power Co.
RECIP. NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 920220 ltr re violations noted in Insp Repts
50-269/92-02, 50-270/92-02 & 50-287/92-02. Corrective actions:
operations clerical support personnel counseled re need to
update controlled documents per distribution ltr.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 / SIZE: 3
TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD2-3 PD	1 1	WIENS, L	1 1
INTERNAL:	ACRS	2 2	AEOD	1 1
	AEOD/DEIIB	1 1	AEOD/DSP/TPAB	1 1
	DEDRO	1 1	NRR HARBUCK, C.	1 1
	NRR MORISSEAU, D	1 1	NRR/DLPQ/LHFBPT	1 1
	NRR/DLPQ/LPEB10	1 1	NRR/DOEA/OEAB	1 1
	NRR/DREP/PEPB9H	1 1	NRR/DST/DIR 8E2	1 1
	NRR/PMAS/ILRB12	1 1	NUDOCS-ABSTRACT	1 1
	OE DIR	1 1	OGC/HDS2	1 1
	<u>REG FILE</u> 02	1 1	RGN2 FILE 01	1 1
EXTERNAL:	EG&G/BRYCE, J.H.	1 1	NRC PDR	1 1
	NSIC	1 1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 24 ENCL 24

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DUKE POWER

March 17, 1992

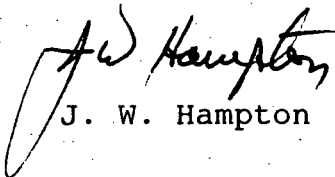
U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Inspection Report 50-269, -270, -287/92-02
Reply to Notice of Violation

Dear Sir:

By letter dated February 20, 1992 the NRC issued Inspection Report No. 50-269/92-02, 50-270/92-02, and 50-287/92-02 with a Notice of Violation. Pursuant to the provision of 10 CFR 2.201, I am submitting a written response to the violation identified in the above Inspection Report.

Very truly yours,


J. W. Hampton

cc: Mr. S. D. Ebnetter, Regional Administrator
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101 Marietta Street, NW Suite 2900
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P. E. Harmon
Senior Resident Inspector
Oconee Nuclear Station

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Violation 269,270,287/92-02-01, Severity Level V

Oconee Technical Specification 6.4.1 states "The station shall be operated and maintained in accordance with approved procedures." Section 6.4.1.d. identifies "emergency procedures involving a potential or actual release of radioactivity as approved procedures."

Oconee Nuclear Station Emergency Plan Appendix P, Table P-1, Implementing Plan Cross Reference, lists the procedures required to implement the Oconee Nuclear Station Emergency Plan. Table P-1 identifies Oconee's Compliance Manual Section 3.5 (previously Station Manual) as the procedure for Administration of the Emergency Plan. Paragraph 4.1 of the Compliance Manual Section 3.5 states the implementing procedures (Volumes B and C) are controlled documents and copies of the manuals will be distributed in accordance with Appendix 6 of the Oconee Nuclear Station Emergency Plan.

Contrary to the above, the licensee had not met the specific requirements of Paragraph 4.1 of the Compliance Manual Section 3.5, in that:

- A. Emergency Plan Implementing Procedures Volume B and C marked as Information Only were not being maintained as controlled documents.
- B. Copies of the Emergency Plan Implementing Procedures Volumes B and C were not being distributed in accordance with Appendix 6.

RESPONSE:

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

A. Operations clerical support personnel failed to update the Implementing Procedures manuals in the Control Rooms as instructed in the distribution letter from Document Control.

Subsequently, two volumes of Implementing Procedures located in the Control Rooms were determined to contain outdated Chemistry procedures. These procedures were "Information Only" copies of procedures used by the Chemistry Section to analyze samples. The procedures were clearly marked "Information Only" and therefore could not have been used as working copy procedures. Control Room personnel interviewed by the Inspector stated that these procedures were "Information Only" and could not be used. The personnel interviewed also indicated that the only Emergency Plan Implementing Procedures available for Control Room personnel to use during a drill or emergency are located in a cart in the Shift Supervisor's office. Current "Control Copy" procedures are located in the Shift Supervisor's office; no problems were identified by the Inspector with the procedures reviewed in the Shift Supervisor's office.

Procedures utilized by the Operational Support Center are "Control Copy" procedures and are available for use by Chemistry personnel responding to the OSC. Therefore, the "Information Only" copies of the Chemistry procedures found to be outdated were not a problem in the OSC. All procedures located in the OSC were found to be correct and current by the Inspector.

The violation is considered to be administrative in nature and does not affect the capability of the Emergency Coordinator to properly classify and handle any emergency that could occur.

B. The distribution list being utilized by Document Control was not in conformance to Appendix 6 of the Emergency Plan. Personnel did not realize that a difference in distribution from what was stated in Appendix 6 constituted a violation.

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

Operations clerical support personnel were counseled concerning the need to update controlled documents according to the Document Control distribution letter.

The Emergency Plan Implementing Procedure Volumes 16B, 16C, and 17B were removed from the Control Rooms to avoid possible confusion of "Information Only" and "Control Copy" procedures.

An additional Emergency Plan Implementing Procedures cart containing "Control Copy" procedures was provided to the Unit 3 Control Room. This cart was labeled as 17C.

Safety Assurance Manual Section 3.2 (formerly Compliance Manual Section 3.5), Administration of Emergency Plan, was revised to give additional guidance for the use of the "Information Only" Implementing Procedures manuals.

Appendix 6 of the Emergency Plan (Volume A) was revised to designate a listing of "Controlled Copy" manuals and a listing of "Information Only" manuals.

The violation was reviewed with Document Control. Before future distributions are made, Document Control will compare their distribution list against the Appendix 6 distribution list. Any changes to the Document Control distribution list will be reviewed by the Emergency Planning section.

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

The corrective actions listed in Item 2 should prevent future violations.

4. The date when full compliance will be achieved:

The corrective actions have been completed.