

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

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ACCESSION NBR: 9208280332      DOC. DATE: 92/08/24      NOTARIZED: NO      DOCKET #  
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 50-270 Oconee Nuclear Station, Unit 2, Duke Power Co.      05000270  
 50-287 Oconee Nuclear Station, Unit 3, Duke Power Co.      05000287

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 RECIP. NAME      RECIPIENT AFFILIATION  
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SUBJECT: Requests that original pages two & three of 920824 response  
 to violations noted in Insp Repts 50-269/92-14, 50-260/92-14  
 & 50-287/92-14 be replaced w/encl pages.

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**DUKE POWER**

August 24, 1992

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

Subject: Oconee Nuclear Site  
Docket Nos. 50-269, -270, -287  
Inspection Report 50-269, -270, -287/92-14  
Reply to Notice of Violation

Dear Sir:

By letter on this same date, August 24, 1992, Duke Power supplied a response to NRC Notice of Violation as described in Inspection Report No. 50-269/92-14, 50-270/92-14, and 50-287/92-14.

Please replace original pages two and three with the attached pages. If there are any questions, please contact Mark E. Patrick at (803) 885-3292.

Very truly yours,

J. W. Hampton

cc: Mr. S. D. Ebnetter, Regional Administrator  
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VIOLATION 269/92-14-01, SEVERITY LEVEL IV

Technical Specification 3.4, Emergency Feedwater System, states that the reactor shall not be heated above 250 degrees Fahrenheit unless two 100 percent Emergency Feedwater flow paths are operable.

The TS Bases defines a 100 percent flowpath as the flowpath to either steam generator including associated valves and piping capable of being supplied by either the turbine driven or associated motor driven pump.

Contrary to the above, the Unit 1 reactor was heated above 250 degrees Fahrenheit on May 11, 1992, and operated until May 25, 1992, with only one 100 percent flowpath operable. Steam generator 1A Emergency Feedwater level control valve, 1FDW-315, was incapable of opening automatically on an Emergency Feedwater actuation signal. The failure of this valve rendered one of the two Emergency Feedwater flowpaths inoperable.

VIOLATION 269,270,287/92-14-02, SEVERITY LEVEL IV

Technical Specification 6.4.1 requires that the station be operated in accordance with approved procedures. Station Performance Manual, Section 4.7, Support of Reactor Trips, Revision dated July 24, 1991, requires that a post trip review be conducted following a reactor trip.

Contrary to the above, the Oconee Nuclear Site Post Trip Review conducted after the Unit 1 reactor trip on May 8, 1992 was inadequate in that it did not require the reviewer to verify that all safety systems performed as expected following a reactor trip. This resulted in the 'A' train of the Emergency Feedwater system being inoperable and undetected.

RESPONSE TO BOTH VIOLATIONS:

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

On May 8, 1992, the Unit 1 reactor tripped and emergency feedwater actuated. The main feedwater pump did not trip and following verification that main feedwater flow and SG levels were responding appropriately, the operators secured the emergency feedwater pumps.

On May 27, 1992, following a shutdown for repair of excessive RCP seal leakage on May 25, 1992, control valve 1FDW-315 was discovered to be inoperable in the automatic mode when a periodic stroke test was performed.

The Post Trip Review, Reactor Transient Analysis, and the subsequent Licensee Event Report for the trip on May 8, 1992

failed to identify the fact that flow did not exist in emergency feedwater train A that contains control valve 1FDW-315. The Post Trip Review Directive did not explicitly require verification of flow in each emergency feedwater header following emergency feedwater actuation. The root cause for the violations was a defective procedure.

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

Immediate:

A work request was issued to investigate and repair 1FDW-315. The investigation revealed that the solenoid valve used for enabling the automatic function of 1FDW-315 had failed, causing control valve 1FDW-315 to be inoperable in the automatic mode. (The valve was manually operable.)

The solenoid was replaced with a new model and a successful stroke test was performed. This type of solenoid failure had been previously identified in LER 287/91-07. The solenoid valves for Unit 2 have been replaced, and the solenoid valves for Unit 3 are being replaced during the current refueling outage.

Subsequent:

Questions raised by Site Management and the Resident Inspector led to the Safety Review Section and Reactor Engineering Group discussing and re-reviewing data from the May 8, 1992 reactor trip. It was noted that the "A" emergency feedwater train had exhibited no flow. From a more detailed review of existing transient monitor information, it was determined that 1FDW-315 had not opened.

The former Post-Trip Review directive was converted into site procedure "Reactor Trip Review Procedure". The content has been expanded and the new procedure is more detailed, especially in the area of safety systems verification. The emergency feedwater section has been revised to include both a caution statement and a verification step to ensure that upon actuation of emergency feedwater, flow is observed in both headers. If flow is not indicated in both emergency feedwater headers, inadequate system performance will be documented, and the condition investigated and resolved prior to restart. Additionally, verification of safety system responses following actuation has also been evaluated for all other safety systems and appropriate enhancements made where necessary.

The "Reactor Trip Review Procedure" also requires a pre-startup Managers Meeting in which cognizant plant personnel will gather to discuss and review the findings of the Post Trip Review. The Shift Manager will review and approve the content of the Reactor Trip Review Procedure and then discuss the results with the Operations Shift Supervisor. The Station Manager (or designee) must now sign approval for restart. The procedure was approved and implemented on July 31, 1992. A copy of the new Oconee procedure has been forwarded to the other Duke Nuclear Sites and will be utilized to assist in the evaluation and review of their Post Trip Review processes by representatives from all three Sites.

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

The remaining solenoid valve for Unit 1 on 1FDW-316 will be replaced during the next refueling outage. This will complete the replacement of solenoid valves.

Test procedures for valves FDW-315 and FDW-316 are being revised to change the test method to allow enhanced online testing and to minimize the risk to the plant during testing. As a result of these changes, testing will be performed quarterly.

4. The date when full compliance will be achieved:

Full compliance was achieved on July 31, 1992 following the solenoid valve replacement, successful stroke test of 1FDW-315 on June 2, 1992, and implementation of the new "Reactor Trip Review Procedure".

The solenoid valve for 1FDW-316 will be replaced during the Unit 1 end of cycle 14 refueling outage, which is currently scheduled to begin November 12, 1992.

The procedure revision and testing of FDW-315/FDW-316 on all three units is expected to be completed during the fourth quarter 1992. The testing will continue on a quarterly frequency.