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RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to NRC 920821 ltr re violations noted in insp repts 50-269/92-15,50-270/92-15 & 50-287/92-15.Corrective actions: formal rounds & turnover procedure will be initiated to enhance monitoring of Keowee Hydro equipment.

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DUKE POWER

September 17, 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, -287/92-15
Reply to Notice of Violation

Dear Sir:

By letter dated August 21, 1992 the NRC issued a Notice of Violation as described in Inspection Report No. 50-269/92-15, 50-270/92-15, and 50-287/92-15.

Pursuant to the provision of 10 CFR 2.201, I am submitting a written response to the violations identified in the above Inspection Report.

Very truly yours,

for Joe M Davis
J. W. Hampton

cc: Mr. S. D. Ebneter, Regional Administrator
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VIOLATION 269,270,287/92-15-01, SEVERITY LEVEL IV

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

Modification procedure TN/5/A/2878/0/0, Addition of Undervoltage Monitoring in Auxiliary Transformer CT-5, required that cable 1EB2T510 be terminated per drawing 0-751-M and OSS-0218.00-00-0004 and independently verified.

Maintenance Directive 7.5.3, Work Request Implementation, requires that disconnection/reconnection of wiring be documented and independently verified on Section V of the work request "Additional Sheet".

1. Contrary to the above, TN/5/A/2878/0/0 was not followed in that on July 13, 1992, cable 1EB2T510 was not terminated per drawing 0-751-M and OSS-0218.00-00-0004. This resulted in blowing a control power fuse and failure of a relay in the circuitry when the modification was tested.

2. Contrary to the above, on July 17, 1992, Maintenance Directive 7.5.3 was not followed during the implementation of modification package TN/5/A/2917/00/AL1 in that wiring was disconnected during the performance of step 8.9.3 of the procedure and was not documented on Section V of the work request "Additional Sheet". The procedure step did not require that the wiring be disconnected and the technician lifted the wires to facilitate the ongoing work activity. The wires were then reterminated onto the wrong connection points.

RESPONSE TO EXAMPLE A:

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

   An I&E technician used a red pen to mark the wiring, as an aid, for this conductor on drawing 0-751-M and marked it to the wrong termination location. When the wire was terminated by another I&E technician, he followed the red marking on the drawing to locate the termination point, thereby causing a wrong termination. The QC Inspector then used the same drawing and verified the wire was terminated on the terminal the red line was drawn to.

   There has been a past practice at Oconee that station designed modifications consisted of drawings that were red-marked showing the new design. Therefore, the I&E technician and the QC Inspector did not recognize this as an unusual condition to see a red marking on the drawing.

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

   The wiring was corrected, the fuse and relay replaced, and QC inspection was completed on July 15, 1992. Post modification testing verified proper installation on July 16, 1992.

   The incident was reviewed with the QC inspection team and the I&E modification team involved.

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

   This incident will be reviewed with all I&E technicians and QC inspectors emphasizing not to use red-marking of drawings to highlight wiring such as modification changes.

4. The date when full compliance will be achieved:

   Full compliance was achieved on July 16, 1992 when the post modification testing was successfully performed.

   Review of this incident by I&E technicians and QC inspectors will be completed by November 1, 1992.

RESPONSE TO EXAMPLE B:

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

   The reason for the violation was failure of the personnel to follow the procedural requirements of Maintenance Directive 7.5.3.

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

   The rolled wiring was corrected and subsequent post modification testing verified correct installation on July 17, 1992.

   The personnel involved were counselled on the requirements of Maintenance Directive 7.5.3 to log lifted leads on a "Component Out of Normal Sheet".

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

Maintenance Directive 7.5.3, Maintenance Paper Work Request Implementation, and Maintenance Directive 7.5.8, WMS Work Order Task Package, will be revised to provided clearer directions on the requirements necessary to control changes to plant configuration, such as the lifting of leads.

An I&E Maintenance Directive will be developed to clarify the requirements for marking/labeling of lifted leads, tagging of lifted leads that are removed from normal position and left unattended, and the logging of lifted leads when not controlled by a procedure.

Additionally, an interim document will be developed to provide guidelines for the proper marking of leads that are lifted to assure the correct relanding of the conductors.

A communication package will be issued or training provided to I&E personnel as necessary on the documents listed above.

4. The date when full compliance will be achieved:

Full compliance was achieved on July 17, 1992 when the wiring was corrected and the subsequent post modification testing was performed successfully.

The interim document and communication of the document will be completed by November 1, 1992.

Maintenance Directives 7.5.3 and 7.5.8 will be revised by January 4, 1993.

The Maintenance Directive on marking, tagging, and logging of lifted leads will be developed and any necessary training will be completed by March 1, 1993.

VIOLATION 269,270,287/92-15-02, SEVERITY LEVEL IV

Oconee Technical Specification 3.7.1 requires two independent on-site emergency power paths consisting of the two Keowee Hydro units, one through the underground path and the other through the overhead path, to be operable when the three Oconee units are greater than 200 degrees fahrenheit.

TS 3.7.7 allows the three Oconee units to be critical for a period not to exceed 24 hours with both Keowee units inoperable for unplanned reasons provided the 4160 volt standby buses are energized within 1 hour by a Lee gas turbine through the dedicated 100 kv transmission circuit.

Contrary to the above, the requirements of TS 3.7.7 were not met in that both Keowee units were inoperable for greater than 24 hours i.e, from approximately 2:30 p.m., on July 16 through 3:13 p.m., July 17, 1992, without the 4160 volt standby busses being energized by a Lee gas turbine.

RESPONSE:

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

   As discussed in Licensee Event Report (LER) 269/92-08, this violation occurred when both Keowee Hydro units were determined to have been out of service greater than 24 hours.

   Keowee Unit 1 was removed from service on July 16, 1992 for modification implementation. On July 17, 1992 it was determined that a previously discovered indication showed that the close circuit 10 amp fuse feeding ACB-8 had blown on Unit 2, thus rendering both units inoperable.

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

   Immediate: A check of the negative fuse for ACB-8 revealed that a 15 amp fuse was installed instead of a 10 amp fuse as called for in the electrical print. Both the 15 amp fuse and the blown 10 amp fuse were replaced with 10 amp fuses.

   ACB-8 was tested satisfactorily and Keowee Unit 2 was declared operable.

   Subsequent: An investigation was performed by the Safety Review Group. The results of this investigation are documented in LER 269/92-08.

   Keowee's Breaker Status checklist has been revised to include additional breaker and indicator status for each breaker. The checklist also gives direction on what to look for and who to call for guidance on other than normal conditions.

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

   A formal rounds and turnover procedure will be initiated to enhance the monitoring of Keowee Hydro equipment.

   Training will be given to Keowee personnel on the new Keowee procedures, checklists, and the time restraints of Technical Specifications.

   I&E will investigate the cause of the fuse failure and test similar fuses for possible failure mode(s).

4. The date when full compliance will be achieved:

   Full compliance was achieved on July 17, 1992 when Keowee Hydro Unit 2 was returned to service.

   The formal rounds and turnover procedure to enhance the monitoring of Keowee Hydro equipment will be developed and approved by September 5, 1992.

   Training for the Keowee personnel will be completed by September 15, 1992.

   I&E will complete the fuse failure investigation and testing of similar fuses for possible failure modes by December 1, 1992.