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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

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

SUBJECT: Responds to NRC 930510 ltr re violations noted in insp rept D
50-269/93-12, 50-270/93-12 & 50-287/93-12. Corrective actions:
reviewed mods, deleted stamps & initiated an audit of all S
drawings in operations.

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Duke Power Company
Oconee Nuclear Site
P.O. Box 1439
Seneca, SC 29679

J. W. HAMPTON
Vice President
(803)885-3499 Office
(803)885-3564 Fax



DUKE POWER

June 7, 1993

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, -287/93-12
Reply to Notice of Violation

Dear Sir:

By letter dated May 10, 1993 the NRC issued a Notice of Violation as described in Inspection Report No. 50-269/93-12, 50-270/93-12, and 50-287/93-12.

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,

A handwritten signature in cursive script, appearing to read 'J. W. Hampton'.

J. W. Hampton

cc: Mr. S. D. Ebnetter, Regional Administrator
U. S. Nuclear Regulatory Commission, Region II

Mr. L. A. Wiens, Project Manager
Office of Nuclear Reactor Regulation

Mr. P. E. Harmon
Senior Resident Inspector
Oconee Nuclear Site

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PDR ADOCK 05000269
Q PDR

Handwritten initials 'JEO' in a stylized, slanted font, located in the bottom right corner of the page.

Document Control Desk
June 7, 1993
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bcc: H. B. Barron
B. L. Peele
G. E. Rothenberger
G. A. Ridgeway
P. E. Mabry
T. E. Hartis
J. W. Peebles
J. M. Davis
M. E. Patrick
S. C. Perry
S. C. Adams
A. V. Carr
W. M. Sample
R. C. Futrell - CNS
R. O. Sharpe - MNS
ELL - EC050
QA TS - EC05P
QVD - EC12A
NSRB - EC12A
OS-815.01

Violation 269,270,287/93-12-01, Severity Level IV

10 CFR 50, Appendix B, Criterion VI requires, in part, that measures shall be established to control drawings, including changes there to. These measures shall assure that documents, including changes, are distributed to and used at the location where the prescribed activity is performed.

The Duke Power Company Quality Assurance Program Topical Report Paragraph 17.3.2.14, requires, in part, that files of drawings applicable to station structures, systems and components are maintained at each nuclear station and are utilized, as appropriate, in the performance of quality related activities. Operations Management Procedure 1-15, Revision 3, Paragraph 5.1 requires controlled drawings within operations be appropriately stamped with a minor change or modification (OE) number and the changes associated with the OE number filed until the controlled drawing is updated.

Contrary to the above, when on April 14, 1993, nine controlled drawings in the Unit 1 control room files were examined, the drawing changes associated with six minor change or modification (OE) numbers (2307, 2240, 2229, 2241, 2257 and 4344) were not on file for drawing numbers OFD 100A-1.1, OFD 122A-1.1, OFD 122A-1.3, OFD 122A-1.4 and OFD 101A-2.3. The same changes were missing from the Unit 2 and Unit 3 control room drawing files.

RESPONSE:

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

Duke Power Company admits NRC Violation 93-12-01 that resulted from the April 14 inspection concerning controlled drawings. The report references non-compliance with the following documents:

1. 10CFR50 Appendix B, Criterion VI
2. Duke Power Company Quality Assurance Topical Report
3. Operations Management Procedure (OMP) 1-15
(NSM Implementation Process)

It is Duke Power's policy that Vital to Operations (VTO) drawings under the Operations Group are to be maintained accurately with respect to the copies in masterfile. When modifications are made to the plant which necessitate the issue of interim drawings, those drawings are verified to be issued and the affected VTO drawing stamped with the modification number. This is performed prior to accepting the modification. The discrepancies noted in this violation did identify that administrative deficiencies existed which led to errors in drawing control. The drawings identified were stamped in error stating an interim drawing was required. However, the modifications involved were minor, did not change plant configuration, and did not require issuance of interim drawings.

An internal audit has been started on the drawings within Operations. The discrepancies noted thus far have been similar to

the items identified in this violation. These discrepancies are not safety significant and do not affect plant configuration control.

The items brought forth by the NRC inspection do identify administrative errors with control of plant drawings. These administrative errors are not acceptable and will be corrected. In addition, actions will be taken to prevent recurrence.

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

The identified modifications were reviewed for impact to the affected plant drawings. The stamps were then deleted from the drawings in question. An audit of all of the drawings in Operations was initiated.

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

The audit being performed on all VTO drawings under Operations control will continue. All discrepancies noted from this audit will be corrected. This audit will be completed by August 10, 1993. Also, Operations personnel involved in drawing updates will be retrained by June 18, 1993 on the proper procedures to ensure future accuracy of the Operations drawings.

4. The date when full compliance will be achieved:

Duke Power Company is in full compliance.