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 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 940407 ltr re violations noted in insp rept
 50-269/94-300, 50-270/94-300 & 50-287/94-300. Corrective
 action: changes were made to OPMs 1-2 & 2-1 & training
 packages were issued to all licensed operators.

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DUKE POWER

May 5, 1994

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, -287/94-300
Reply to Notice of Violation

Dear Sir:

By letter dated April 7, 1994 the NRC issued a Notice of Violation as described in Inspection Report No. 50-269/94-300, 50-270/94-300, and 50-287/94-300.

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,

for J. W. Hampton

cc: Mr. S. D. Ebner, 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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Violation 269,270,287/94-300-02, Severity Level IV

10 CFR 50, Appendix B, Criterion VI, states that measures shall be established to control the issuance of documents such as instructions, procedures, and drawings including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel. Operations Management Procedure (OMP) 1-1, "Administration of Operations Management Procedures," states that a Qualified Reviewer in Operations shall review all new procedures and revisions. Enclosure 8.1, "OMP Periodic Review Checklist," states that the Qualified Reviewer shall verify that the new or revised OMP does not conflict with other OMPs.

Contrary to the above, the licensee failed to verify that a change to OMP 2-1 "Duties and Responsibilities of On Shift Operations Personnel," concerning the approval needed for non-procedural bypassing of a Safety System, did not conflict with other OMPs. On June 1, 1993, the licensee changed OMP 2-1, so that step 2.3 of Enclosure 4.11, "Guidelines for Bypassing of Safety Systems," allowed a Safety System to be bypassed without specific procedure guidance under direction of the Control Room SRO or Unit Supervisor. Step 4.10 of OMP 1-2, "Rules of Practice," required approval from two licensed personnel, one of whom is a supervisor who holds an SRO license. The procedure conflict existed from June 1, 1993 until March 16, 1994.

RESPONSE:

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

The guidance for non-procedural blocking of safety systems was included in Operations Management Procedure (OMP) 1-2 on January 16, 1987. This guidance required two licensed operators, one of whom held an SRO license, to agree in order to non-procedurally bypass a safety system.

As a result of the Crystal River event in which the spray valve stuck open and a reactor operator bypassed ES, the B&W Owners Group (B&WOG) recommended that SRO approval (Unit Supervisor or Control Room SRO) be required for non-procedurally bypassing a safety system. This recommendation was incorporated into OMP 2-1 on June 1, 1993. OMP 1-2 was not referenced during this OMP change. The review of this OMP did not catch the discrepancy. The individuals involved in this OMP change were concerned with meeting the intent of the B&WOG recommendation. They were caught up in the details and forgot the 'big picture'. The reference back to the guidance found in OMP 1-2 was not performed. This is considered to be an isolated event.

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

On March 16, 1994, changes were made to OMPs 1-2 and 2-1. The guidance contained in OMP 1-2 has been incorporated into OMP 2-1. It now takes two licensed operators, one of whom holds an SRO license, to non-procedurally bypass a safety system. Since OMP 2-1 has the guidance for bypassing safety systems, the guidance in OMP 1-2 has been deleted. In addition, a training package was issued to all licensed operators to review this information.

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

The corrective actions listed in Item 2 will prevent further violations.

4. The date when full compliance will be achieved:

Duke Power Company is in full compliance.