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       50-287 Oconee Nuclear Station, Unit 3, Duke Power Co.      05000287

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SUBJECT: Responds to NRC 940407 ltr re violations noted in insp repts  
           50-269/94-30, 50-270/94-30 & 50-287/94-30. Corrective actions:  
           made changes to Operations Mgt Procedures 1-2 & 2-1.

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**DUKE POWER**  
June 16, 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:

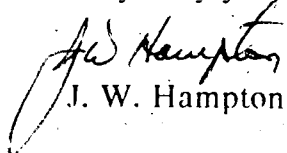
By letter dated April 7, 1994 the NRC issued a Notice of Violation as described in Inspection Report No. 50-269/94-300, 50-270/94-300, and 50-287/94-300.

Pursuant to the provision of 10 CFR 2.201, a written response to the violation identified in the above Inspection Report was submitted.

On May 31, 1994 a telephone call between Mr. L. L. Lawyer, Operator Licensing Section, and Mr. G. E. Rothenberger, Oconee Operations Superintendent, was conducted. Mr. Lawyer requested that a revised response be submitted which included additional corrective action.

As requested, I am submitting a revised response to the violation identified in the above Inspection Report.

Very truly yours,

  
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

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 and led to the discrepancy that was discovered during the license exam. OMP 1-2 was not referenced during this OMP change. The review of this OMP change 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 and clearly defines how to non-procedurally bypass a safety system.

The individuals involved with making this OMP change have been counseled.

An additional training package has been issued to all licensed operators which addresses the concern of making changes to an OMP that creates a conflict with another policy or procedure. This training package expresses the fact that it is the expectation of Operations Management that personnel who make changes or review changes to policy and/or procedures, including OMPs, are to ensure conflicts with existing policy or procedures do not exist.

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.