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SUBJECT: Responds to NRC 940616 ltr re violations noted in insp rept  
50-269/94-16 & 50-270/94-16 & 50-287/94-16. Corrective  
actions:RO involved has been counseled.

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**DUKE POWER**

July 13, 1994

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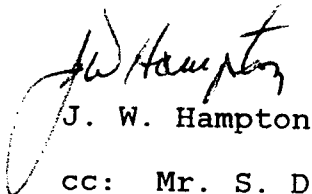
Subject: Oconee Nuclear Site  
Docket Nos. 50-269, -270, -287  
Inspection Report 50-269, -270, -287/94-16  
Reply to Notice of Violation

Dear Sir:

By letter dated June 16, 1994 the NRC issued a Notice of Violation as described in Inspection Report No. 50-269/94-16, 50-270/94-16, and 50-287/94-16.

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,

  
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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Violation 287/94-16-02, Severity Level IV

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

Operations Procedure OP/3/A/1103/04, Soluble Poison Concentration Control, Enclosure 3.16, "Operation of 3A Deborating Demineralizer to De-Lithiate Unit 3", requires as a prerequisite for utilizing this enclosure that the 3A Deborating Demineralizer be designated by Chemistry for use in de-lithiation of the Reactor Coolant System.

Contrary to the above, on May 23, 1994, the 3A Deborating Demineralizer was inadvertently utilized for de-lithiation of the RCS rather than the Chemistry designated 3B Deborating Demineralizer. This resulted in an inadvertent dilution of the Reactor Coolant System.

RESPONSE:

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

Duke Power Company is in agreement with this violation as stated. Personnel error was the reason for the violation. The Reactor Operator (RO) that was involved in this event was aware that the 3B Deborating Demineralizer was being utilized for de-lithiation. This fact was established by the fact that it was stated on the Unit 3 turnover sheet and was discussed with the RO as part of a pre-job brief. When the RO procured a copy of the procedure, the wrong enclosure was pulled and checked against the control copy. The RO then used the wrong enclosure and placed the 3A Deborating Demineralizer in service instead of the 3B. The 3A Deborating Demineralizer was not boron saturated, which led to the deboration event. During this event, the RO did not perform adequate STAR (Stop, Think, Act, Review) self checking techniques. The RO didn't stop to think about the task that was being performed. There were several opportunities for the RO to realize that the wrong enclosure was being used. However, the individual was following the procedure without reviewing the results and consequences of each action. The SRO in the Control Room should have also been more aware of the actions of the RO as the evolution progressed.

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

The immediate actions taken at the time of the event included stopping the flow through the 3A Deborating Demineralizer and begin feed and bleed from the 3A Bleed Holdup Tank to borate the RCS as a result of the 6 ppm deboration event.

The RO involved in this event has been counseled on the importance of performing good STAR self checking techniques. The importance of thinking about the task at hand was stressed during this counselling. The SRO involved in this event has

been counseled on the importance of staying involved in the activities that occur in the control room.

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

The individual involved in this event shall present this event to all five operating shifts. The lessons learned from this event will be stressed during this training. The SRO involved in this event will assist the RO in this training. This training will be complete by 08/30/94.

4. The date when full compliance will be achieved:

Duke Power Company is in full compliance.