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AUTH.NAME AUTHOR AFFILIATION
HAMPTON,J.W. Duke Power Co.
RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to NRC 940824 ltr re violations noted in insp rept 50-269/94-21,50-270/94-21 & 50-287/94-21.Corrective action: walk down insp of ACB air support system was performed.

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PRIORITY 1 DOCUMENT

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

September 23, 1994

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Subject: Oconee Nuclear Site
Docket No. 50-269
Inspection Report 50-269, -270, -287/94-21
Reply to Notice of Violation

Dear Sir:

By letter dated August 24, 1994 the NRC issued a Notice of Violation as described in Inspection Report No. 50-269/94-21, 50-270/94-21, and 50-287/94-21.

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

Very truly yours,

for J. W. Hampton

cc: Mr. S. D. Ebneter, 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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REPLY TO NOTICE OF VIOLATION

Violation 269/94-21-01, Severity Level IV

10 CFR 50 Appendix B, Criterion II, "Quality Assurance Program," states in part "The applicant shall identify the structures, systems and components to be covered by the quality assurance program."

Duke Power Company Topical Report 1-A states through reference to ANSI 45.2.11 that all structures, systems and components necessary to mitigate the consequences of an accident are applicable to the quality assurance program, designated QA-1, and a controlled listing of those components are issued under the approval of the site Vice President.

Nuclear System Directive 307, "Quality Standards Manual" provides the mechanism for determining whether or not a given structure, system or component is nuclear safety-related consistent with the Quality Assurance Topical Report. Quality Standards Manual, Section 307.3.3, states in part that an electrical system or component shall be treated as QA Condition 1 (nuclear safety-related) if it is necessary for Emergency Power Systems (AC and DC).

Contrary to the above, as of July 16, 1994, the licensee's identification of components covered by the quality assurance program was inadequate in that the Quality Standards Manual did not reflect that the supporting air system for Keowee Air Circuit Breakers (ACB) 1-4, necessary for the Onsite Emergency Power System to function, were QA Condition 1. Consequently, the licensee's quality assurance program was not applied to this air system, and therefore: (1) adequate periodic maintenance was not performed on this system to ensure its quality; (2) a controlled drawing was never developed for this system; and (3) controls had not been placed on activities affecting the quality of the system to an extent consistent with its importance to safety. The inadequate maintenance resulted in excessive ACB check valve leakage and a regulating valve failure that contributed to an inadvertent lockout of the overhead emergency power path on June 14, 1994.

RESPONSE:

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

   For the violation as described above, Duke Power Company acknowledges and accepts the cited example as a violation of NRC requirements.

   The reason for the violation is due to an error on Duke Power's part to identify the Keowee air circuit breaker's (ACB) air support system as a system needed in order for the Keowee emergency power system to perform its intended

design function. The ACB air support system is defined as the system beginning with the 300 PSI accumulator through its connected piping and regulator down to the ACB's check valve. Failure to identify this system in response to NRC Generic Letter 83-28 resulted in this item not being included in the Quality Standards Manual (QSM).

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

Since the June 14, 1994 event several corrective steps associated with this system have been performed. They are as follows:

1. A walk down inspection of the ACB air support system was performed. It was judged that the system could withstand a seismic event without loss of function.

2. Preventative and corrective maintenance has been performed on the ACBs and their air support system including the check valves, regulating valves and compressor. Each component was left operable and capable to perform its intended function.

3. The "Keowee Shift Turnover and Rounds" procedure has been revised to include surveying the ACB and compressor storage and discharge pressure readings. These pressures are recorded each shift to ensure they are at their normal operating pressure ($\geq$150 PSI).

4. A Keowee Operations Guide has been issued for an additional surveillance to verify ACB air pressure is at its normal operating pressure ($\geq$150 PSI) prior to connecting it to the system grid. This is a temporary guide imposed until a permanent modification which monitors normal pressure is installed.

5. A temporary modification has been installed to eliminate the overhead path lockout function on loss of air. Therefore, the need of automatic air make-up during an emergency event is not required.

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

Other Keowee systems previously identified as performing a safety function will be reviewed to determine if supporting systems exist, and are not identified, which must operate in order for the primary function to be accomplished.

The maintenance procedures for the ACBs and their associated air support system will be reviewed and revised

in accordance with standard Oconee maintenance procedures. Maintenance on this equipment will be performed using these "A" (safety related) procedures.

NSD-307 (Quality Standards Manual) will be revised to include the ACB air support system. A comment to this line item will be listed to indicate that maintenance shall be performed using safety related procedures.

A controlled drawing is being developed for the Keowee ACB air system (i.e. compressor through the ACB)

A modification will be performed to enhance the logic associated with the ACB's air support system. Additional monitoring points will be installed on each Unit's ACB air header providing alarms in both Keowee and Oconee control rooms on decreasing pressure below its normal operating pressure. The existing pressure switches on each breaker's accumulator will continue to be used providing further alarms, computer and events recorder points on actuation from decreasing air. The previously installed temporary modification will be replaced to allow the lockout function to occur for the overhead breakers during normal operation only.

4. The date when full compliance will be achieved:

Due to the temporary modification and the revised surveillance procedure the ACB air support system is not required during a design basis event. Therefore, Oconee is presently operating within full compliance.

However, the review of the remaining Keowee safety systems as discussed above will be completed by November 30, 1994.

The maintenance procedures will be reviewed/revised prior the next scheduled preventative maintenance activity being performed.

The QSM will be revised to include the ACB air support system. This will be accomplished during its next quarterly update.

The air system controlled drawing will be issued along with the permanent modification described above, presently scheduled for 11/94.

The permanent modification mentioned above will be installed during the Keowee outage allocated to install NSM ON-52966. NSM ON-52966 is currently being reviewed by the NRR and is presently scheduled to be installed during innage 61 (11/94 - 5/95).