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ACCESSION NBR: 9410260337 DOC. DATE: 94/10/20 NOTARIZED: NO DOCKET #
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 HAMPTON, J.W. Duke Power Co.
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SUBJECT: Forwards amended response to violation noted in Insp Repts 50-269/94-15, 50-270/94-15 & 50-287/94-15, ack subj violation. Corrective actions: further investigation of subj valve failure to open will continue.

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DUKE POWER

October 20, 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, -287/94-15
Revised Reply to Notice of Violation

Dear Sir:

By letter dated August 05, 1994 the NRC issued a Notice of Violation as described in Inspection Report No. 50-269/94-15, 50-270/94-15, and 50-287/94-15. By letter dated September 6, 1994, Duke responded to this Notice of Violation, indicating that the Violation was denied. After further clarification regarding the content of the Notice of Violation via discussion with the cognizant NRC inspector, Duke is acknowledging the subject Violation.

I am submitting an amended response to the Violation identified in the subject Inspection Report.

Very truly yours,


J. W. Hampton

attachment

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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Attachment 1
Revised Reply to Notice of Violation
Violation 269/94-15-01, Severity Level IV

10 CFR 50 Appendix B, Criterion V, as implemented by Duke Power Company Topical Report, Quality Assurance Program, Duke-1 requires that activities effecting quality shall be prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstance and shall be accomplished in accordance with these instructions, procedures or drawings.

Contrary to the above, on June 21, 1994, while performing a ten year Inservice Inspection test, on Unit 1, Motor-Operated Valve 1LP-103 was opened under conditions not established by documented instructions and not accomplished in accordance with appropriate procedures. Test instructions did not provide explicit guidance for the existing plant conditions. As a result, when the attempt was made to open the valve the motor and overload heaters were damaged requiring the valve to be operated by hand to conduct the test.

RESPONSE:

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

Duke Power Company (DPC) previously denied this violation. However, with clarifications from discussions with NRC officials on October 4, 1994, Duke Power hereby amends its position and acknowledges the violation. Duke Power Company accepts the violation due to lack of guidance in the procedure to address 1) Thermal Binding precautions and 2) Process improvements.

Although Duke Power has performed evaluations for the phenomenon of thermal binding, the evaluations were made for conditions associated with the valve's safety functions. However, for some pressure tests, the valves are positioned under conditions more stringent than the associated safety function. Duke now realizes that the phenomenon of thermal binding must be addressed for these valves. Therefore the precautions for such situations will be incorporated into the pressure test procedures.

Regarding Process Improvement, Duke Power now realizes a need to clearly document the requirements for revising process control information. For example, additional statements controlling changes of prerequisites on this type of generic procedure would be appropriate. Currently there are controls in the generic procedure and the Nuclear System Directives that address the voiding of steps when not applicable, and which specify additional requirements; but these items do not address conditions for revising the requirements. Duke Power will decide to either put these controls in the generic procedures or have the Nuclear System Directives address the controls.

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

Further investigation of this valve's failure to open will continue. During the next scheduled refueling outage for Unit 1, the valve and its operator will be closely examined.

A Problem Investigation Report was initiated to determine how to identify valves which may be susceptible to thermal binding during pressure testing. An initial review has been made of pressure tests planned for the upcoming refueling outage for possibility of this thermal binding phenomenon. Two potential cases were found and will be evaluated prior to the pressure test.

The changes to process control information (such as additional prerequisites), as a minimum, will require a note of explanation on the specific procedure log sheet with verification of reviews by the appropriate personnel who performed the initial review.

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

The continued review of this incident, combined with the promulgation of a Generic Letter (to assist the industry in identifying limiting pressure/temperature parameters for addressing thermal binding and pressure locking), should provide a means of significantly reducing further incidents of this nature.

Additionally, the pressure test procedures will be revised to require evaluations of potential conditions for which thermal binding may occur.

Requirements will be generated in either the Nuclear System Directives or the generic pressure test procedures to control revision of process control documentation for specific pressure tests.

4. The date when full compliance will be achieved:

Pressure test procedures will be revised by January 5, 1995 to implement precautions for thermal binding and to implement measures for changing process controls for specific pressure test procedures. If the measures for revising process control are determined to be general in nature and hence impractical for placement in the generic pressure test procedures, then the Nuclear System Directives will be revised by May 1995 to incorporate these concerns on a company-wide basis. Results from the examination of valve 1LP-103 should be known after the next Unit 1 refueling outage.