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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 941013 ltr re violations noted in insp repts 50-269/94-26,50-270/94-26 & 50-287/94-26.Corrective actions: performed procedure on 940901 & initiated problem investigation process.

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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

November 10, 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, -287/94-26
Reply to Notice of Violation

Dear Sir:

By letter dated October 13, 1994, the NRC issued a Notice of Violation as described in Inspection Report No. 50-269/94-26, 50-270/94-26, and 50-287/94-26.

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

Very truly yours,

J. W. Hampton

Attachment 140671

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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Attachment 1
Reply to Notice of Violation
Violation 94-26-01, Severity Level IV

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions, procedures, and drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Contrary to the above, activities affecting quality were not performed as required by procedure OP/0/A/2000/045, Lock Verification, in that the semi-annual verification of valve position was not performed until September 1, 1994. This procedure was required to be performed semi-annually but had not been performed since original issue of the procedure on June 29, 1993.

RESPONSE:

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

Duke Power Company acknowledges this violation.

During the Electrical Distribution System Functional Inspection (EDSFI) conducted during the first quarter of 1993, a question was raised concerning over-pressurization protection of the various heat exchanger systems of each Keowee unit. Proposed solutions consisted of two different methods: 1) Perform an engineering analysis and calculation of the systems and install over-pressurization protection valves (relief valves); or 2) Administratively control the discharge valves by using a mechanical locking method and provide for the periodic surveillance of these locked valves. The latter method was chosen in order to provide an expeditious solution. Additionally, individual removal and restoration procedures (Operating procedures) were created to provide for the control of valve manipulations of each valve in these systems. In addition, procedure OP/0/A/2000/045 (Keowee Lock Verification) was created, with a semi-annual frequency of execution, to accomplish the periodic surveillance of the locked valves. The operating procedure format was chosen due to the decision of not assigning a periodic test procedure format series for use at Keowee Hydro Station.

At the Keowee Hydro Station, operating procedures primarily consists of removal and restoration sequences. However, since the periodic test procedure format has not been utilized, the operating procedure format was used for the periodic surveillance. The surveillance procedure being an operating procedure, a different method of tracking the performance of the procedure was intended to be used which consisted of station personnel activating the procedure when required.

Attachment 1
Reply to Notice of Violation
Violation 94-26-01, Severity Level IV

1) *continued*

Operating procedures historically are performed when required by a work order for the system which is to be maintained. Due to the procedure in question being written as an operating procedure and not as a periodic surveillance or maintenance procedure, scheduling through the Work Management System (WMS) was inadvertently not performed.

In discussions with Keowee personnel, it was believed that a previous execution of the procedure in question had been performed but a copy could not be found in the station files.

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

Immediately upon realization that a copy of the surveillance procedure (OP/0/A/2000/045) could not be found, the procedure was performed. Performance of the procedure was on September 1, 1994 with all valves listed being in their correct position.

Problem Investigation Process (PIP) report 4-094-1346 was initiated to identify this problem and to track all corrective actions associated with this PIP.

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

On September 21, 1994, a model work order (94072206) was created on the Work Management System (WMS) computer system which will automatically schedule all future execution intervals of this surveillance procedure. The next execution date is March 1995.

Additionally, all Keowee surveillance procedures have been reviewed and any surveillance activities which had not previously been identified and entered into the Work Management System (WMS) have now been entered and will be executed at their pre-determined intervals. No additional missed surveillance activities have been identified.

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4) ***The date when full compliance will be achieved:***

Full compliance was achieved on September 1, 1994. This procedure activity having been entered in the Work Management System (WMS), surveillance activities of this procedure will be performed semi-annually as committed.