

NOTICE OF VIOLATION

Duke Power Company
Oconee Nuclear Plant

Docket Nos. 50-269, 50-270
and 50-287
License Nos. DPR-38, DPR-47
and DPR-55

During an NRC inspection conducted on December 12-16, 1994, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Duke Power Procedure NSD 704, "Technical Procedure Use and Adherence," paragraph 704.6.1, states that procedures shall be adhered to during the course of activities.

Contrary to the above, on December 13, 1994, the site's I&C technicians failed to follow procedures as evidenced by the following examples:

1. Oconee Procedure IP/O/B/0270/001U, "Main Steam System Turbine Chest Cavity Instrument Calibration" specifies the steps for proper calibration of two Motorola pressure transmitters (3PT-41P and 3PT-150P) for Unit 3. Paragraphs 10.5.3 and 10.5.4 call for insertion of the test signal at the test "T" between the shutoff valve and the pressure transmitter. The inspectors observed technicians sign off and independently verify these steps for both instruments, even though the signal was actually inserted directly into the transmitter vice the test "T" as required.
2. Oconee Procedure WPM 700, Revision 1, "Execute the Work Plan," step 700.5.2.3, requires, in part, that work supervisors verify the personnel qualifications required for the performance of maintenance and surveillance tasks. Also, Oconee Procedure MD 3.2.2, "Requirements for Qualifying to Maintenance Procedures/Tasks," paragraph 4.9, requires, in part, that when procedure related work must be performed and qualified personnel are not available, the work must be supervised or, as a minimum, briefings be held and documented prior to work start, and a post-work review of results should be obtained. The inspectors identified that, since July 16, 1992, no I&C technicians have been qualified to perform the monthly surveillance on RIA Cabinet 4RIA-45/46 in accordance with Oconee Procedure IP/O/B/0398/016, "Rad Waste Facility, Kaman Process Radiation Monitor Functional Test." The inspectors also identified

that the I&C supervisor and technicians failed to follow procedures WPM 700 and MD 3.2.2 in that they failed to execute prescribed contingencies for those cases when no one is qualified to perform the work.

This is a Severity Level IV violation (Supplement I)

- B. 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances, ... (and) shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Duke Power Procedure NSD 700, "Independent Verification," Paragraph 700.5, "Applicability," states, in part, that Independent Verification (IV) applies to removal from and restoration to operability of all systems or components which affect the ability of a system to perform a safety related function.

Contrary to the above, on December 14, 1994, the inspectors identified that Surveillance Procedure PT/O/A/0150/22D, "Individual Valve Stroke Test," was inadequate in that it failed to direct the operators to perform an independent valve and clearance tag verification during the conduct of the surveillance on the 3A reactor building spray pump suction header isolation valve, 3BS-1.

This is a Severity Level IV violation (Supplement I)

Pursuant to the provisions of 10 CFR 2.201, Duke Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice of Violation (Notice), within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or demand for information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Atlanta, Georgia
this day of