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 HAMPTON, J.W. Duke Power Co.
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SUBJECT: Forwards response to NRC 941221 ltr re violations in insp
 repts 50-269/94-36, 50-270/94-36 & 50-287/94-36. Corrective
 actions: drains & vents on 2A seal supply filter closed.

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DUKE POWER

January 19, 1995

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, -287/94-36
Reply to Notice of Violation

Dear Sir:

By letter dated December 21, 1994 the NRC issued a Notice of Violation as described in Inspection Report No. 50-269/94-36, 50-270/94-36, and 50-287/94-36.

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,


for
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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Attachment 1
Reply to Notice of Violation
Violation 94-36-02, Severity Level IV

Technical Specification 6.4.1 requires, in part, that the station shall be operated and maintained in accordance with approved procedures.

Operations procedure, OP/2/A/1104/02, High Pressure Injection System, Enclosure 6.7, Swapping Seal Supply Filters, Step 2.5 requires a leak check of the filter prior to putting it in service.

Contrary to the above, these requirements were not met in that the 2 A High Pressure Injection Seal Supply Filter was put in service on November 18, 1994, without first performing a leak check after maintenance had been performed on the filter. This resulted in a loss of injection to the seals on the reactor coolant pumps and a loss of reactor coolant inventory from the letdown storage tank.

RESPONSE:

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

On November 18, 1994, the 2A Seal Supply Filter was placed into service without performing a leak check as required by procedure. This resulted in a loss of inventory to the Letdown Storage tank. Duke Power Company acknowledges the violation.

The reason for the violation was Enclosure 6.7 of OP/2/A/1104/02(High Pressure Injection) was not properly followed when returning the Seal Supply Filter to service. The 2A Seal Supply Filter had been isolated to check for a gasket leak. While the 2A Seal Supply Filter was isolated, the 2B Seal Supply Filter delta-P went off-scale high (>30 psid). The gasket leak on the 2A Seal Supply Filter was small and it was decided to place this filter back into service until the 2B Seal Supply Filter could be changed out. The individuals involved in the valving in of the 2A Seal Supply Filter did not perform a thorough review of the procedures involved in this evolution. The operators that placed the 2A Seal Supply Filter back into service had pulled a new Enclosure 6.7 without properly referencing the procedure in progress. This led to the 2A Seal Supply Filter being placed into service with its vents and drains open.

Attachment 1
Reply to Notice of Violation
Violation 94-36-02, Severity Level IV

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

The drains and vents on the 2A Seal Supply Filter were closed. This stopped the leak from the Letdown Storage Tank. The plant was stabilized and returned to normal.

The individuals involved in this incident have written up an evaluation of the event. Included in this evaluation was the importance of performing a thorough review of procedures prior to performing them.

The individuals involved in this event have been counseled on the importance of procedure review and thoroughness prior to starting a task/job.

The individuals involved in this event have reviewed OP/1,2,3/A/1104/02 (High Pressure Injection) and have identified changes to enhance the procedures.

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

- Procedure changes will be made to OP/1,2,3/A/1104/02 (High Pressure Injection) to include cautions that inform the operator to check the vents and drains prior to valving in a Seal Supply Filter.
- Procedure changes will be made to Enclosure 6.7 (Swapping Seal Supply Filters) of OP/1,2,3/A/1104/02 (High Pressure Injection) to include a work description/information on the type of work being performed when the filter changeout is performed (ie. gasket leak or filter replacement).
- The evaluation written up by the individuals involved in this event will be routed to all five shifts for a review of lessons learned.

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

All of the corrective actions in Section 2 (Corrective Actions Taken) have been performed. The procedure changes (planned corrective actions I & II) in Section 3 (Corrective Actions Planned) will be completed by February 17, 1995. The review of this event by all five shifts (planned corrective action III) will be completed by February 28, 1995.