

# PRIORITY 1

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SUBJECT: Forwards response to NRC 950125 ltr re violations noted in insp repts 50-269/93-31, 50-270/93-31 & 50-287/93-31.  
 Corrective actions: requested for TS change to add surveillance test for mod circuitry has been submitted.

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**DUKE POWER**

February 24, 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, -287/93-31  
Supplemental Response to Notice of Violation

Dear Sir:

By letter dated January 25, 1994, the NRC issued a Notice of Violation as described in Inspection Report No. 50-269/93-31, 50-270/93-31, and 50-287/93-31. By letter dated February 24, 1994, Duke responded to this Notice of Violation. By letter dated January 30, 1995, the NRC requested additional information.

I am submitting a supplemental response to the violation identified in the subject Inspection Report.

Very truly yours,

*J. W. Hampton / R. L. Swartz*

J. W. Hampton

cc: Mr. S. D. Ebnetter, Regional Administrator  
U. S. Nuclear Regulatory Commission, Region II

Mr. L. A. Wiens, Project Manager

Mr. P. E. Harmon  
Senior Resident Inspector  
Oconee Nuclear Site

*JEU*

**Attachment 1**  
**Reply to Notice of Violation**  
**Violation 93-31-02 Severity Level IV**

10 CFR 50.59, Changes, tests and experiments, states in part "The holder of a license authorizing operation of a production or utilization facility may (i) make changes in the facility as described in the safety analysis report, (ii) make changes in the procedures as described in the safety analysis report, and (iii) conduct tests or experiments not described in the safety analysis report, without prior commission approval, unless the proposed change, test or experiment involves a change in the Technical Specifications incorporated in the license or an unreviewed safety question.

Contrary to the above, the 50.59 evaluation performed to support implementation of NSM-52966, Modify Keowee ACBs 3 and 4 to Automatically Close During Postulated Single Failure to ACBs 1 and 2, was inadequate in that the evaluation did not identify that a change in the Technical Specifications incorporated in the license was required prior to implementation of the modification.

**RESPONSE:**

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

The already installed modification has not been electrically connected. A request for a Technical Specification (TS) change to add a surveillance test for the modification circuitry has been submitted to the NRC.

Duke Power Company Nuclear System Directive (NSD) 209 "10CFR 50.59 Evaluations" has been revised to clarify and emphasize the need to consider new TS surveillances when performing safety evaluations. This information has been routed to all Qualified Reviewers onsite responsible for checking 50.59 evaluations.

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

As noted in the earlier response, the need for a new TS surveillance not being identified was in part due to the lack of clear guidance in the NSD. The changes to NSD 209 (see Item 1) will alleviate this problem. No further actions are necessary.

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

All corrective actions are presently complete. The date of the NSD 209 revision is 8-1-94. The modification and proposed TS surveillance addition have been submitted to the NRC for approval.