

# PRIORITY 1

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AUTH. NAME    AUTHOR AFFILIATION  
HAMPTON, J.W.    Duke Power Co.  
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SUBJECT: Forwards response to NRC 950712 ltr re violations noted in  
insp repts 50-269/95-11, 50-270/95-11 & 50-287/95-11.  
Corrective actions: will emphasize mgt expectations of  
Engineering Support Division & Nuclear Egnigeering Division.

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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**

August 11, 1995

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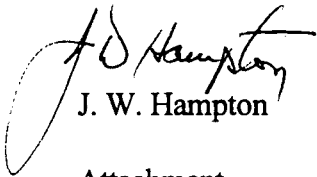
Subject: Oconee Nuclear Site  
Docket No. 50-269,-270,-287  
Inspection Report 50-269, -270, -287/95-11  
Reply to Notice of Violation

Dear Sir:

By letter dated July 12, 1995, the NRC issued a Notice of Violation as described in Inspection Report No. 50-269/95-11, 50-270/95-11, and 50-287/95-11.

Pursuant to the provisions of 10 CFR 2.201, please find attached a written response to the Notice of 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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August 11, 1995  
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bcc: B. L. Peele  
J. M. Davis  
D. B. Coyle  
C. A. Little  
B. K. Millsaps  
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D. M. Hubbard  
R. L. Sweigart  
W. W. Foster  
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K. S. Canady  
G. A. Copp  
ELL - EC05O  
NSRB - EC05N

Attachment 1  
Reply to Notice of Violation  
Violation 50-269, 270, 287/95-11-02

10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," and the licensee's Quality Assurance Program (Duke-1-A, Section 17.3.2.13) require that measures be established to assure that conditions adverse to quality are promptly identified and corrected.

Duke Power Nuclear System Directive 208, "Problem Investigation Process (PIP)," defines the process by which 10 CFR 50, Appendix B, Criterion XVI requirements are implemented at the nuclear stations. Section 208.1 states in part that this directive provides a mechanism by which problems are identified, documented, and responded to with a level of effort and timeliness commensurate with their significance. Section 208.5.1 requires that upon identification of a problem, the employee will initiate the PIP.

Contrary to the above, on May 23, 1995, the licensee identified a problem requiring an operability evaluation for three High Pressure Injection system containment isolation valves (3HP-3, 3HP-4 and 3HP-20), but did not initiate the PIP for this problem until June 6, 1995.

RESPONSE:

1. Reason for the violation:

Duke Power Company acknowledges the violation.

The reason for the violation is inadequate program monitoring/management of the Problem Investigation Process (PIP). Nuclear Site Directive 208, in its present form, does not define a specific time frame or limit to initiate/document a PIP once a problem has been judged to require inclusion in the PIP process. Instead, reliance is placed upon department management to develop and communicate expectations to each of the department organizations as to how to document PIP's "with a level of effort and timeliness commensurate with their significance."

Attachment 1  
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2. Corrective steps that have been taken and the results achieved:

The problem identified in calculation OSC-2061, Revision 2, was reviewed by a Site Component Engineering Specialist to determine the operability of valves 3HP-3, 3HP-4, and 3HP-20. While no PIP was initiated at that time, the evaluation performed by the Specialist verified the operability of the valves on May 25, 1995, two days after the approval of the calculation.

The problem identified in calculation OSC-2061, Revision 2, was documented in PIP 3-095-0663 on June 6, 1995. The formal operability documentation was subsequently completed.

The need to use the PIP program to identify significant problems in a timely manner was reviewed with the group responsible for this calculation. A root cause analysis was completed for this problem.

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

- 1) Management expectations of the Engineering Support Division and the Nuclear Engineering Division regarding the timeliness of initiating a PIP will be clearly communicated and emphasized. This corrective action will be completed by 09/15/95.
- 2) NSD 208 "Problem Investigation Process" will be revised to incorporate specific guidance defining the time frame required for PIP initiation, based on problem significance. This corrective action will be complete by 1/15/96.

4. Date when full compliance will be achieved:

Oconee Nuclear Station is in full compliance.