

DMB

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September 2, 1986

Dr. J. Nelson Grace, Regional Administrator
U.S. Nuclear Regulatory Commission - Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Ga. 30323

Subject: Oconee Nuclear Station
IE Inspection Report
50-269/86-20, 50-270/86-20, 50-287/86-20

Dear Sir:

In response to your letter dated August 1, 1986, which transmitted the subject Inspection Report, the attached response to the subject items of non-compliance is provided.

Very truly yours,



Hal B. Tucker

PJN/66/jgm

xc: Mr. J.C. Bryant
NRC Resident Inspector
Oconee Nuclear Station

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Violation

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

Procedure OP/1/A/1102/10, Controlling Procedure for Unit Shutdown, enclosure 4.3, steps 4, 5, and 6, require that independent verification of the high pressure injection flow path to the pressurizer auxiliary spray line be performed.

Contrary to the above requirement, on May 23, 1986, Procedure No. OP/1/A/1102/10, was not followed in its entirety in that, although independent verification of proper initiation of auxiliary pressurizer spray apparently was performed, it was not documented.

This is a Severity Level V Violation (Supplement I). This violation applies to Unit 1 only.

Response

- 1) Admission or denial of the alleged violation:

The violation is correct as stated.

- 2) Reasons for the violation:

The Operators involved performed Independent Verification through "diverse means", but failed to sign off the verification step because "hands on" and visual verification were going to be performed later.

- 3) The corrective steps which have been taken and the results achieved:

The Operators involved were counseled, stressing the importance of properly performing and documenting Independent Verification. "Hands on" and visual verification were performed by the on-coming shift and the verification step was signed off.

- 4) The corrective steps which will be taken to avoid further violations:

The importance of performing and properly documenting Independent Verification has been and will continue to be stressed to all licensed Operators. This will be re-emphasized in upcoming Crew meetings and Shift Supervisor meetings, and completed by October 1, 1986.

- 5) Date when full compliance will be achieved:

Full compliance was achieved upon successful reverification and adequate documentation on May 23, 1986.

Deviation

Section 3.7.4.1 of the Oconee Final Safety Analysis Report (FSAR) provides the location and description of seismic instrumentation installed at the site. The FSAR describes six plant locations, all in Unit 1, where peak recording accelerometers are to be installed.

Contrary to the above, there is only one location at the Oconee site where a peak recording accelerometer is currently installed or operable. Accelerometers previously located in the other five locations are inoperable. Some or all of these instruments may have been removed subsequent to the licensee recognizing their state of deterioration in 1979.

Response

- 1) Corrective actions regarding this deviation:

An inspection to determine the present status of all 2G peak recording accelerometers in the Unit 1 Reactor Building is planned. An evaluation of the need for these peak recording accelerometers has been initiated.

- 2) Actions taken to avoid further deviations:

In addition to the planned inspection and evaluation of the peak recording accelerometers, the seismic instrumentation program has been reviewed against FSAR Section 3.7.4.1. This review identified the seismic trigger feeding the control room annunciator for replacement. The annunciator alarms when design basis seismic motion is sensed. The plan for further corrective actions regarding this deviation will be determined after reviewing the results of the inspection and evaluation.

- 3) Dates when these actions were or will be completed:

The plan for further corrective actions regarding this deviation will be determined prior to the completion of the upcoming Unit 1 Refueling Outage. The station modification to upgrade the control room stataarm seismic trigger is scheduled for implementation by the end of Unit 1 Refueling Outage.