

JUL 17 1987

Docket Nos. 50-269, 50-270, 50-287  
License Nos. DPR-38, DPR-47, DPR-55  
EA 87-101

Dyke Power Company  
ATTN: Mr. H. B. Tucker, Vice President  
Nuclear Production Department  
422 South Church Street  
Charlotte, NC 28242

Gentlemen:

SUBJECT: NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTY  
(NRC INSPECTION REPORT NOS. 50-269/87-16, 50-270/87-16 AND  
50-287/87-16)

This refers to the NRC inspection conducted on April 16-28, 1987, at the Oconee Nuclear Station, which included a review of the circumstances surrounding inoperability of the high pressure injection (HPI) system and reactor building cooling (RBC) units. The results of the inspection were forwarded to you in a letter dated May 1, 1987. The events, which resulted in a violation of NRC regulatory requirements, were identified by your plant staff and reported to the NRC. NRC concerns relative to the inspection findings associated with the events were discussed by M. Ernst, Deputy Regional Administrator, NRC, Region II, with M. McIntosh, M. Tuckman, and other members of your staff, at an Enforcement Conference held on May 13, 1987, at the Region II Office.

The violations described in the enclosed Notice of Violation involved significant failures to properly implement a start-up procedure which caused the two HPI trains and the three RBC units to be inoperable when technical specifications required them to be operable. Violation A involved the failure to assure two operable flow paths existed from the borated water storage tank (BWST) to the reactor coolant system (RCS). With the reactor starting up and the RCS above 350°F, both suction valves from the BWST to the HPI pumps were closed with the power supply breakers to the valves open contrary to procedural requirements. The isolation of the HPI pump suctions from the BWST caused the HPI system to be inoperable because it would not have fulfilled its intended function of providing borated water to the RCS to mitigate the consequences, automatically, of a small break loss of coolant accident or steam line break accident. Also, operator action might not have been sufficiently quick enough to restore the system to assure that the accident consequences would be within the design basis analysis. Violation B involved the failure to assure that three independent RBC trains were operable. With the RCS heated above 250°F, the Low Pressure Service Water (LPSW) valves providing cooling water to the RBC units were left closed contrary to procedural requirements.

The principal factors contributing to these events were a lack of communication and insufficient attention to procedural details which led to the breakdown of

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several administrative controls that should have precluded continuing startup with improperly positioned breakers and valves. We are particularly concerned that control room personnel had several opportunities after the initial failure to adequately review the Red Tag Log to identify that the HPI valves were mispositioned. Specifically, (1) an opportunity existed for two shifts to discover that the HP-24 and HP-25 power supply breakers were open had control panel indication lights been conscientiously reviewed by control room personnel; (2) two shift turnovers failed to identify the problem; (3) a console light checklist identified a discrepancy in the status lights, but this did not alert the unit supervisor; and (4) a review of the computer alarm printouts should have shown an improper alarm condition.

To emphasize to all levels of control room personnel and those that support plant operations the need for diligent attention to detail and for maintaining systems operable, I have been authorized, after consultation with the Director, Office of Enforcement, and the Deputy Executive Director for Regional Operations, to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalty in the amount of Twenty-Five Thousand Dollars (\$25,000) for the violations described in the enclosed Notice. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987) (Enforcement Policy), the violations described in the enclosed Notice have been categorized as a Severity Level III problem. The base value of a civil penalty for a Severity Level III violation or problem is \$50,000. The NRC Enforcement Policy allows for reduction of a civil penalty under certain circumstances. In consideration of the escalation and mitigation factors, the NRC recognizes that (1) you have had previous good performance in the areas of reactor startup, shutdown, and technical specification compliance as reflected in the SALP Category 1 rating in the operations area, and (2) your corrective actions were considered unusually prompt and extensive. However, because of the duration of one of the violations including the several opportunities available to control room personnel to identify and correct the situation regarding the HPI suction valves and the fact that multiple violations are involved, full mitigation of the civil penalty was not deemed appropriate. The NRC considers the violations and the circumstances associated with the violations to be of significant regulatory concern because of the failure to assure that in separate events two systems important to safe operation of the plant were not operable prior to resuming plant operation, the possible damage to the HPI pumps had an initiation signal been received, and the number of licensed operators and supervisors involved.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

Duke Power Company

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The responses directed by this letter and its enclosure are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, P.L. No. 96-511.

Sincerely,

**Original signed by**  
**J. Nelson Grace**

J. Nelson Grace  
Regional Administrator

Enclosure:  
Notice of Violation and Proposed  
Imposition of Civil Penalty

cc w/encl:  
✓ M. S. Tuckman, Station Manager

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Duke Power Company

- bcc w/encls:
- ✓ NRC Resident Inspector
- ✓ H. Pastis, NRR
- ✓ State of South Carolina
- ✓ PDR
- ✓ SECY
- ✓ CA
- ✓ JTaylor, DEDO
- ✓ JNGrace, RII
- ✓ JLieberman, OE
- ✓ HWong, OE
- ✓ SSohinki, OGC
- ✓ Enforcement Coordinators
- ✓ RI, RII, RIII, RIV, RV
- ✓ TMurley, NRR
- ✓ PIngram, PA
- ✓ EJordan, AEOD
- ✓ BReyes, OI
- ✓ SConnelly, OIA
- ✓ OE File
- ✓ DCS

RII:EICS

*[Signature]*  
 GRJenkins  
 7/16/87

RII:DRP

*[Signature]*  
 LAReyes  
 7/16/87

RII:ORA

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