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 RECIP. NAME: AUTHORITY AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 871229 ltr re violations noted in Insp Repts
 50-269/87-49, 50-270/87-49 & 50-287/87-49. Corrective actions:
 mechanical maint engineer & planning & scheduling engineer
 reviewed event w/sections.

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January 28, 1988

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

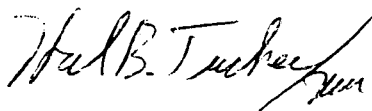
Subject: Oconee Nuclear Station
IE Inspection Report 87-49
Reply To A Notice Of Violation
Docket Nos. 50-269, -270, -287

Dear Sir:

Please find attached Duke Power Company's response to the violation contained in IE Inspection Report 50-269, -270, -287/87-49. This violation involved the failure to maintain containment integrity during refueling operations. It is Duke Power's opinion that the use of the term "containment integrity" was inappropriate as cited in the violation. As discussed in Item 1 of the response to the violation, Duke Power requests that the Notice of Violation be revised to delete the term "containment integrity".

As requested in the December 29, 1987 letter from the NRC, discussion is included in the response which addresses the correction of management control deficiencies.

Very truly yours,



Hal B. Tucker

WHM/1281/sbn

Attachment

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

Mr. P. H. Skinner
NRC Resident Inspector
Oconee Nuclear Station

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VIOLATION (SEVERITY LEVEL IV)

Oconee Nuclear Station Technical Specification 3.8.6 states "During the handling of irradiated fuel in the reactor building, at least one door on the personnel and emergency hatches shall be closed. The equipment hatch cover shall be in place with a minimum of four bolts securing the cover to the sealing surface." An Oconee Nuclear Station Technical Specification interpretation for Technical Specification 3.8 explains that, in addition to the requirements of Technical Specification 3.8.6, any other pathway other than the hatches listed shall be covered, sealed or isolated with the intent to prevent air flow from inside the Reactor Building at normal atmospheric pressure.

10 CFR 50, Appendix B, Criterion III, Design Control states that design changes shall be subject to design control measures commensurate with those applied to the original design and be approved by the organization that performed the original design unless the licensee designates another responsible organization.

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

Contrary to the above requirements:

- (A) In the periods of September 24-28 and October 10-12, 1987, refueling operations were conducted at Oconee Unit 1 with gaps totalling 3 to 4 square inches in the emergency hatch seals and equalization valve. Also in the periods of February 23 to March 13, 1986, (Unit 1), August 19 to February 27, 1986, (Unit 2) and December 30, 1986 to March 8, 1987, (Unit 3) refueling operations were carried out with the one-inch equalizing valves open in the emergency hatches, thus negating containment integrity.
- (B) The Emergency Hatch Temporary Modification ONTM-0297 was not adequately prepared nor reviewed, in that it was not taken into consideration that unlocking the equipment hatch doors automatically cammed open the one-inch equalization valves.
- (C) The procedure for foaming closed penetrations through the emergency hatch was not adequate in that it did not adequately describe how the job was to be performed and was not provided to the workmen performing the job.

RESPONSE:

(1) Admission Or Denial Of The Alleged Violation

This violation is admitted. However, the difference between "containment integrity" and "containment isolation" during refueling conditions should be clarified. Containment integrity requirements are delineated in Technical Specification 1.7 and 3.6 and apply when the reactor is in conditions other than refueling shutdown. During the handling of irradiated fuel within the Reactor Building, Technical Specification 3.8.6 requires that at least one door on the personnel and emergency hatches be closed, and that the equipment hatch cover be held in place with a minimum of four bolts.

To assist in the understanding and implementation of the requirements of Specification 3.8.6, a Technical Specification interpretation was developed. The objective of

the interpretation was to provide a conservative position in regard to complying with the requirements of the specification. Thus, the interpretation stated that in addition to the hatches identified, any other pathway shall be covered, sealed or isolated with the intent of preventing a direct unmonitored, uncontrolled air flow from inside the containment to the outside atmosphere. This would minimize radioactive effluent releases to the environment in the event of a fuel handling accident. This interpretation should not be misunderstood to mean that Technical Specification 3.8 would require containment integrity, as defined by Technical Specifications 1.7 and 3.6, to be maintained during the movement of irradiated fuel in the Reactor Building. Accordingly, the use of the phrase "containment integrity" should be deleted from the Notice of Violation and the Inspection Report (50-269, -270, -287/87-49) because containment integrity is not a requirement during this mode of operation.

(2) Reason For The Violation If Admitted

As noted in Licensee Event Report 50-269/87-08, the reasons for the violations were a combination of Management Deficiency in the planning and execution of the latest emergency hatch sealing job, and a Design Deficiency repeated each time a temporary modification was used to install the Emergency Hatch closure plate and temporary seals.

(3) Corrective Steps Which Have Been Taken And The Results Achieved

- (A) The Mechanical Maintenance Engineer has reviewed this event with his section. This review emphasized the importance of individuals being qualified to perform a task, and the completion of the task prior to the associated procedure step being signed off.
- (B) The Planning and Scheduling Engineer reviewed this event with the appropriate personnel in his section emphasizing the deficiencies identified by the event investigation.

(4) Corrective Steps Which Will Be Taken To Avoid Further Violations

- (A) This event will be reviewed by appropriate Project Services personnel with attention given to the problems caused by following a previous design without performing a separate evaluation.
- (B) The Project Services Engineer will ensure that the requirements of the Duke Procedure Writer's Guide are fully implemented in this section.
- (C) Construction and Maintenance Division (CMD) Management will re-emphasize to their craft supervision, including those involved in this event, the requirement to perform work using approved procedures and/or work requests.
- (D) CMD Management has initiated action to ensure all appropriate CMD personnel are trained and qualified in accordance with the Administrative Policy Manual for Nuclear Stations and the Oconee

Nuclear Station Directives. This is an on-going program to provide consistent and proper management control over all personnel performing activities at Oconee Nuclear Station.

(5) Dates When Full Compliance Will Be Achieved

- (A) Item 4(A) will be completed by February 1, 1988.
- (B) Item 4(B) will be completed by November 1, 1988.
- (C) Item 4(C) will be completed by February 15, 1988.
- (D) Item 4(D) is a continuing process, therefore a single compliance date cannot be assigned.