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SUBJECT: Responds to NRC 880503 ltr re violations noted in Insp Repts
 50-269/88-08, 50-270/88-08 & 50-287/88-08.

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June 2, 1988

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
IE Inspection Report 50-269, -270, -287/88-08

Gentlemen:

Please find attached a response to the subject Notice of Violation dated May 3, 1988. This violation concerned component verification.

Very truly yours,



Hal B. Tucker

PJN/333/bhp

Attachment

xc: Dr. J. Nelson Grace
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VIOLATION #50-269, 270, 287/88-08, SEVERITY LEVEL IV:

Oconee Nuclear Station Technical Specification 6.4.1 states that the station shall be operated and maintained in accordance with approved procedures and that these procedures shall contain appropriate check-off lists and instructions. Station Directive 2.2.2, Independent Verification identifies the methods used to perform component verification to assure applicable components being removed from service are the correct component.

Contrary to the above, the method used to perform component verification to assure the correct component is identified prior to performing maintenance was inadequate.

1. On February 11, 1988, a spill of 400-600 gallons of radioactive water occurred because Station Directive 2.2.2 did not adequately detail how an unlabeled component was to be verified as the correct component prior to performing maintenance. A Unit 1 valve under normal pressure was worked upon in lieu of a Unit 2 valve.
2. On February 25, 1988, 2MS-83, a 6 inch Main Steam Valve, was removed from service instead of 2MS-85 due to inadequate method of verification that the work being performed was being done on the correct component.

RESPONSE

1. Admission or denial of the alleged violation:

This violation is admitted as stated.

2. Reason for violation:

This violation occurred due to failure of management to properly implement the correct component verification program. Guidance given to personnel was insufficient to assure that the correct components would be removed from service. In addition, personnel errors as well as lack of component labels contributed to this violation.

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

Appropriate maintenance personnel have been provided explicit written instructions on correct methods of component identification. Operations personnel have been given instructions on acceptable means of identifying components requiring maintenance using the "orange tag" program. Station Directive 3.2.1 has been revised to provide better guidance for correct component verification. Personnel committing errors have been counseled.

4. Corrective steps which will be taken to avoid further violations:

As a continuing process, currently implemented programs will assure that labels are provided for significant components, including valves. This will enhance the prescribed programs for correct component verification.

5. Date of full compliance:

The station is presently considered to be in compliance with the component verification program.