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ACCESSION NBK: 9502240213 DOC. DATE: 95/02/10 NOTARIZED: NO DOCKET #
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 50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287

AUTH. NAME AUTHOR AFFILIATION
 HAMPTON, J.W. Duke Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 950113 ltr re violations noted in insp repts
 50-269/94-37, 50-270/94-37 & 50-287/94-37. Corrective actions:
 procedure use & adherence reinforced w/I&C technicians &
 supervisors & procedure IP/O/B/0270/001U will be revised.

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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

February 10, 1995

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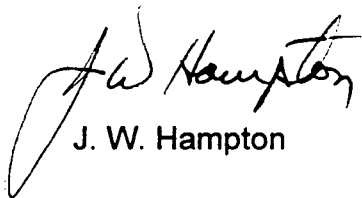
Subject: Oconee Nuclear Site
Docket No. 50-287
Inspection Report 50-269, -270, -287/94-37
Reply to Notice of Violation

Dear Sir:

By letter dated January 13, 1995 the NRC issued a Notice of Violation as described in Inspection Report No. 50-269/94-37, 50-270/94-37, and 50-287/94-37.

Pursuant to the provisions of 10 CFR 2.201, I am submitting a written response to the Violations identified in the subject Inspection Reports.

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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Attachment 1
Reply to Notice of Violation
Violation 94-37-03 Severity Level IV

10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Duke Power Procedure NSD 704, "Technical Procedure Use and Adherence," paragraph 704.6.1, states that procedures shall be adhered to during the course of activities.

Contrary to the above, on December 13, 1994, the site's I&C technicians failed to follow procedures as evidenced by the following examples:

1. Oconee Procedure IP/0/B/0270/001U, "Main Steam System Turbine Chest Cavity Instrument Calibration" specifies the steps for proper calibration of two Motorola pressure transmitters (3PT-41P and (3PT-105P) for Unit 3. Paragraphs 10.5.3 and 10.5.4 call for insertion of the test signal at the test "T" between the shutoff valve and the pressure transmitter. The inspectors observed technicians sign off and independently verify these steps for both instruments, even though the signal was actually inserted directly into the transmitter vice the test "T" as required.
2. Oconee Procedure WPM 700, Revision 1, "Execute the Work Plan," step 700.5.2.3, requires, in part, that work supervisors verify the personnel qualifications required for the performance of maintenance and surveillance tasks. Also, Oconee Procedure MD 3.2.2, "Requirements for Qualifying to Maintenance Procedures/Tasks," paragraph 4.9, requires, in part, that when procedure related work must be performed and qualified personnel are not available, the work must be supervised or, as a minimum, briefing be held and documented prior to work start, and a post-work review of results should be obtained. The inspectors identified that, since July 16, 1992, no I&C technicians have been qualified to perform the monthly surveillance on RIA Cabinet 4RIA-45/46 in accordance with Oconee Procedure IP/0/B/0398/016, "Rad Waste Facility, Kaman Process Radiation Monitor Functional Test." The inspectors also identified that the I&C supervisor and technicians failed to follow procedures WPM 700 and MD 3.2.2 in that they failed to execute prescribed contingencies for those cases when no one is qualified to perform the work.

Attachment 1
Reply to Notice of Violation
Violation 94-37-03 Severity Level IV

RESPONSE:

1) *The reason for the violation, or if contested, the basis for disputing the violation:*

Duke Power Company acknowledges the violation.

Example 1:

On December 13, 1994 two technicians were performing calibrations in accordance with Oconee Procedure IP/O/B/0270/001U, "Main Steam System Turbine Chest Cavity Instrument Calibration." Steps 10.5.3 and 10.5.4 of this procedure required the insertion of the test signal at the test "T" between the shutoff valve and the pressure transmitter. The technicians signed off and independently verified these procedure steps as being completed, even though they actually inserted the signal directly into the transmitter. There was not a test "T" in the instrument line and the technicians felt that they were meeting the intent of the procedure by introducing the signal at the transmitter even though they did not follow the procedure as written.

Example 2:

A technician was assigned to perform Oconee Procedure, IP/O/B/0398/016, "Rad Waste Facility, Kaman Process Radiation Monitor Functional Test" for RIA Cabinet 4RIA-45/46. Qualifications for work on this RIA cabinet were established on July 16, 1992. The ETQS computer data base of qualified personnel to support this work was reviewed and no one was found listed as qualified to do the work. The technician thought he was qualified based on training received prior to July 1992. There apparently was an administrative error in the processing of the technicians qualifications for this task. The responsible supervisor had recently acquired responsibility for the Rad Waste RIA's and thought that the technician that was transferred with this accountability was qualified. There was a failure to verify through established processes the qualification status of the technician prior to assignment to the task.

Attachment 1
Reply to Notice of Violation
Violation 94-37-03 Severity Level IV

2) *The corrective steps that have been taken and the results achieved:*

Example 1:

Procedure Use and Adherence has been reinforced with I&C technicians and supervisors. On January 17, 1995, the station manager issued a communication to managers and supervisors on procedure use and adherence. During scheduled weekly team meetings the team leaders reviewed the requirements of the communication with team members that clarified and emphasized that procedure steps shall be followed as they are written. If a procedure can not be performed as written, technicians must stop work and get the procedure changed before proceeding further.

Procedure IP/O/B/0270/001U will be revised to agree with the plant configuration or a modification to the plant configuration will be implemented prior to performance of the next scheduled PM.

Example 2:

An evaluation of the technician's skill and experience with the task, and an evaluation against the elements of the Training & Qualification (T&Q) Guide has been completed. The technician was determined to be qualified and the qualification records have been processed and approved January 26, 1995.

Additionally, it has been emphasized to I&E Maintenance teams that qualifications must be verified prior to assignment to tasks. This requirement has been reinforced through the development of pre-job briefing standards. The standards include verifying personnel qualifications. The pre-job briefing standards are posted in the I&E team areas.

Attachment 1
Reply to Notice of Violation
Violation 94-37-03 Severity Level IV

3) *The corrective steps that will be taken to avoid further violations:*

Example 1:

No additional corrective action required.

Example 2:

No additional corrective action required.

4) *The date when full compliance will be achieved:*

On January 26, 1995 Duke Power Company was in full compliance.

Attachment 2
Reply to Notice of Violation
Violation 94-37-04 Severity Level IV

10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances ,... (and shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Duke Power Procedure NSD 700, "Independent Verification," Paragraph 700.5, "Applicability," states, in part, that Independent Verification (IV) applies to removal from and restoration to operability of all systems or components which affect the ability of a system to perform a safety related function.

Contrary to the above, on December 14, 1994, the inspectors identified that Surveillance Procedure PT/0/A/0150/22D, " Individual Valve Stroke Test," was inadequate in that it failed to direct the operators to perform an independent valve and clearance tag verification during the conduct of the surveillance on the 3A reactor building spray pump suction header isolation valve, 3BS-1.

RESPONSE:

1. The reason for the violation, or if contested, the basis for disputing the violation:

Duke Power Company acknowledges this violation. The reason for the violation is that the SRO that dispatched the NLO to rack out the '3A' Reactor Building Spray Pump (RBSP) breaker failed to assign an operator to perform an independent verification (IV) of the task. The procedure in use, PT/3/A/0150/22A, Operational Valve Stroke Test, had only a single sign-off blank. This misled the SRO into his decision to utilize only one NLO.

PT/0/A/0150/22D (Individual Valve Stroke Test), the procedure cited in the violation, directs the Operations Performance Technician to perform PT/0/A/0150/22A, 22B, or 22R, as appropriate. PT/0/A/0150/22A did not have double sign-off blanks at the step for racking out the '3A' RBSP since it referred the operator to use OP/0/A/1102/06, Removal and Restoration of Station Equipment (R&R). This OP provides the operator with guidance for racking in and out of 4160 V breakers.

Attachment 2
Reply to Notice of Violation
Violation 94-37-04 Severity Level IV

The R&R OP, Enclosure 3.3, Procedure for Removing or Returning to Service 6900/4160/600 Volt Breakers, had the double sign-off necessary to guide the operators to independently verify that the action being taken was correct until they were removed by a rewrite approved on August 26, 1994. All sign-off blanks were removed from this enclosure at this time based on the frequency of the enclosures use and the nature of the task described by the enclosure. This task, racking in and out breakers, is performed so frequently that there is no need for a qualified operator to have a procedure in hand to safely and correctly perform the task. The documentation of the verification of the removal of components requiring IV, which was also being performed by the sign-off steps in the OP enclosure, was dropped at the time that the R&R procedure was rewritten.

2. *The corrective steps that have been taken and the results achieved:*

The test procedure in use was changed to provide double sign-off blanks to prompt the operator that Independent Verification is required. A review of other PTs of this nature was conducted to find other procedural problems of the same type. All PTs with problems of this type were removed from service until the changes can be made.

3. *The corrective steps that will be taken to avoid further violations:*

A training package will be issued for review by all operators to refresh their training on situations that require Independent Verification.

4. *The date when full compliance will be achieved:*

The training package will be issued prior to March 1, 1995 and the review by all operators will be completed before June 1, 1995.

The PTs that were removed from service will be changed prior to their restoration.