

# PRIORITY 1

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SUBJECT: Forwards response to NRC 950125 ltr re violations noted in insp repts 50-269/94-38, 50-270/94-38 & 50-287/94-38.  
 Corrective actions: Keowee procedure OP/O/A2000/041, was revised to give operators instructions.

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**DUKE POWER**

February 24, 1995

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

Subject: Oconee Nuclear Site  
Docket Nos. 50-269, -270, -287  
Inspection Report 50-269, -270, -287/94-38  
Reply to Notice of Violation

Dear Sir:

By letter dated January 25, 1994 the NRC issued a Notice of Violation as described in Inspection Report No. 50-269/94-38, 50-270/94-38, and 50-287/94-38. Pursuant to the provisions of 10 CFR 2.201, I am submitting a written response to the violation identified in the subject Inspection Report.

Very truly yours,

*J. W. Hampton / R. L. Sweigart*  
J. W. Hampton

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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TEO

**Attachment 1**  
**Reply to Notice of Violation**  
**Violation 94-38-01, Severity Level IV**

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

Operations procedure, OP/0/A/1106/019, Keowee Hydro at Oconee, Enclosure 3.4, Shutdown, requires a Keowee hydro unit to be shutdown prior to transferring operational control from remote (Oconee) to local (Keowee).

Contrary to the above, on December 11, 1994, Keowee Hydro Unit 1 was not operated in accordance with OP/0/A/1106/019, Enclosure 3.4, in that operational control of the hydro unit was transferred from remote to local with the unit operating at speed-no-load conditions instead of being shutdown. The transfer of control with the unit operating at speed-no-load conditions resulted in overheating the generator field breaker closing coil and a loss of excitation to the operating hydro unit.

**RESPONSE:**

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

Duke Power Company acknowledges the violation.

On December 11, 1994, Enclosure 3.4 of Operations Procedure, OP/0/A/1106/019, Keowee Hydro at Oconee, was performed. Later, in response to the dispatcher, Keowee was to transfer control from remote to local using OP/0/A/2000/041, Keowee Modes of Operation.

The Keowee procedure, OP/0/A/2000/041, did not contain steps to transfer control using the remote/local switch, therefore, the Keowee Hydro Operator had no written instruction to shutdown the operating hydro unit prior to transferring control from remote to local. The Keowee Hydro Operator and Technician discussed past operating experiences where control had been transferred successfully with the hydro unit operating with electrical load. They did not realize this was not possible with the hydro unit operating with no load.

The attempt to transfer control with the unit operating at speed-no-load conditions resulted in overheating the generator field breaker closing coil and a loss of excitation to the operating hydro unit due to the internal breaker closure logic.

**Attachment 1**  
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**2) *The corrective steps that have been taken and the results achieved:***

The Keowee procedure, OP/0/A/2000/041, was revised to give Keowee operators instructions which prevent control transfer while the Keowee Unit is operating. A team meeting was conducted and all Keowee operators were trained on the revisions made to OP/0/A/2000/041, specifically, remote to local transfers. Furthermore, management briefed all Keowee Personnel on the process and expectations of conservative decision making.

After the incident, troubleshooting was performed on the close coil of the field breaker. After inspection and test, the coil was found to be good. However, as a precaution, the coil was replaced when an acceptable substitute was found to be on site. This was done to remove any doubt about the operability of the existing coil and field breaker.

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

The Oconee procedure, OP/0/A/1106/019, Keowee Hydro at Oconee, will be revised to provide guidelines for control transfers.

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

The revision to OP/0/A/2000/041 and training to all Keowee Operators was completed on January 30, 1995.

The revision to OP/0/A/1106/019 will be complete on June 1, 1995.