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50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287
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RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Forwards response to NRC 950524 ltr re violations noted in
insp repts 50-269/95-06,50-270/95-06 & 50-287/95-06. O
Corrective actions:approved Rev 4 of OSC-6003,which reduced R
maximum operating limit for Keowee Hydor unit.

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DUKE POWER

June 23, 1995

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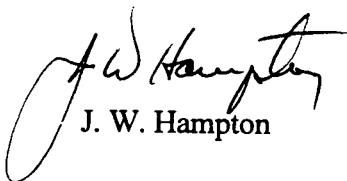
Subject: Oconee Nuclear Site
Docket No. 50-269,-270,-287
Inspection Report 50-269, -270, -287/95-06
Reply to Notice of Violation

Dear Sir:

By letter dated May 24, 1995, the NRC issued a Notice of Violation as described in Inspection Report No. 50-269/95-06, 50-270/95-06, and 50-287/95-06.

Pursuant to the provisions of 10 CFR 2.201, please find attached a written response to the Notice of Violation identified in the subject inspection report.

Very truly yours,



J. W. Hampton

Attachment

cc: Mr. S. D. Ebnetter, Regional Administrator
U.S. Nuclear Regulatory Commission, Region II

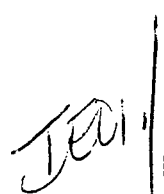
Mr. L. A. Wiens, Project Manager
Office of Nuclear Reactor Regulation

Mr. P. E. Harmon
Senior Resident Inspector
Oconee Nuclear Site

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Attachment 1
Reply to Notice of Violation
Violation 50-269, 270, 287/95-06-01

10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," and the licensee's Quality Assurance Program (Duke-1-A, Section 17.3.2.13) require that measures be established to assure that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, appropriate measures were not established to assure correction of an adverse condition to quality involving inadequate control over Keowee load limit changes (Violation 50-269, 270, 287/93-20-03). As a result, another change to Keowee load limits was inadequately controlled on March 15, 1995.

RESPONSE:

1. Reason for the violation:

Duke Power Company acknowledges the violation.

The reason for the violation is the informal communication of a change in operating limits for Keowee Hydro Station. On March 15, 1995, engineering personnel stated by phone to Keowee personnel that an error existed in the load limit calculation, but did not clearly communicate a request to immediately reduce the load limit from 69 MW to 68 MW. It was the understanding of the Keowee Staff member that the calculation was still in review and an operability evaluation would be issued when the exact amount of load reduction was determined.

2. Corrective steps that have been taken and the results achieved:

Revision 4 of OSC-6003, which reduced the maximum operating limit for a Keowee Hydro Unit from 69 MW to 68 MW, was approved on March 20, 1995. An operability evaluation reducing the load limit by one (1) megawatt was approved on March 20, 1995 and issued to Oconee and Keowee Operations on that day. Keowee output was administratively reduced by notation on the Keowee operator's turnover sheet on March 20, 1995. The Keowee Modes of Operation procedure was changed and re-issued to the Operators on March 21, 1995.

It is noted that although no verbal or written instructions were given to Keowee Operators to reduce unit output from March 15 until March 20, 1995, two (2) hours of generation were at 64 MW and all other generation was less. The hydro units have not been operated above 63 MW [68 MW - (5 MW conservatism for load swings)] since the revised operability evaluation was issued on March 20, 1995.

Attachment 1
Reply to Notice of Violation
Violation 50-269, 270, 287/95-06-01

3. Corrective steps that will be taken to avoid further violations:

- a. Oconee Nuclear Site Engineering will implement a formal means of informing the Operations Shift Manager of changes in operability of station equipment.
- b. Operations Management Procedure 5-2 (Duties and Responsibilities of Keowee Station Personnel) will be changed to require immediate notification of the Oconee Operations Shift Manager of a change in Keowee Hydro Unit operability, determined by Keowee operations personnel.
- c. Commercial operation of Keowee will be suspended when a change in operating limits of the emergency power sources is determined not to be conservatively within procedure boundaries. Appropriate procedure changes will be made prior to resuming generation to the electrical grid. Keowee Hydro Station safety system operating limits will not be established by phone communication, memos, or letters. Operations Management Procedure 5-3 (Emergency Power System) will be changed to include the requirements.
- d. Operations management will meet with each Keowee Station Operator and Staff member to provide direction concerning the correct handling of operability issues. The direction will emphasize that Keowee units will be operated by approved procedures. Informal communications such as phone communications, letters, or memos are not to be used in place of procedures for safety system operation.

4. Date when full compliance will be achieved:

The corrective actions stated above will be implemented by October 1, 1995, with the exception of the Oconee Nuclear Site Engineering formal means of notifying the Operations Shift Manager of operability changes which will be implemented by January 30, 1996.

Keowee was placed in full compliance with the new load limits on March 20, 1995.