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SUBJECT: Responds to NRC 881102 ltr re violations noted in Insp Repts
 50-269/88-32, 50-270/88-32 & 50-287/88-32.

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Duke Power Company
P.O. Box 33198
Charlotte, N.C. 28242



DUKE POWER

December 2, 1988

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Inspection Report 50-269, -270, -287/88-32

Gentlemen:

Please find attached a response to the subject Notice of Violation dated November 2, 1988 concerning overpressurization of steam generator sample piping.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Hal B. Tucker'.

Hal B. Tucker

PJN

xc: M.L. Ernst
Acting Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta Street, NW, Suite 2900
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December 2, 1988

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OS-815.01
(21)

DUKE POWER COMPANY
OCONEE NUCLEAR STATION
REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS. 50-269,-270,-287/88-32

VIOLATION (287/88-32-02)

Technical Specification 6.4.1 requires that the station be operated and maintained in accordance with approved procedures. Station Directive (SD) 3.2.1, Work Request, section 6.1 requires the appropriate person to consult the "Quality Standards Manual for Structures, Systems and Components", OFDs (Oconee Flow Diagrams), Attachment #4 (QA Condition Determinations) and Station Directive 4.5.4 (QA Condition Determination) to determine whether a QA condition is involved and what the condition is.

Contrary to the above, on September 22, 1988, S.D. 3.2.1 was not followed in that a work request was not designated as QA condition work which resulted in overpressurization of safety related piping.

This is a severity level IV violation (Supplement I).

RESPONSE:

1. Admission or denial of the alleged violation:

Duke Power Company admits the violation as stated.

2. Reason for violation:

Planning and Scheduling failed to identify the QA condition and Duke ISI class on the work request. Craft personnel failed to follow a procedure in performing this work. Both Planning and Scheduling and craft personnel should have asked for support to properly identify the allowable pressures and method for correcting the problem.

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

The events of this incident have been reviewed with all the planners to assure they are aware of the correct means of handling situation such as this. In the future Planning and Scheduling will work with Engineering for assistance in determining acceptable methods for clearing clogged instrument lines. The craft personnel and supervisors have been cautioned against applying pressure to any lines without engineering knowledge and instructions.

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

No additional steps are outstanding.

5. Date of full compliance:

December 1, 1988