

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8904260393 DOC. DATE: 89/04/17 NOTARIZED: NO DOCKET #
 CIL: 50-269 Oconee Nuclear Station, Unit 1, Duke Power Co. 05000269
 50-270 Oconee Nuclear Station, Unit 2, Duke Power Co. 05000270
 50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287

AUTH. NAME AUTHOR AFFILIATION
 TUCKER, H.B. Duke Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 890316 ltr re deviatons noted in Insp Repts
 50-269/89-07, 50-270/89-07 & 50-287/89-07.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 7
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR	ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	ENCL
	PD2-3 PD	1	1	PASTIS, H	1	1
INTERNAL:	ACRS	2	2	AEOD	1	1
	AEOD/DEIIB	1	1	DEDRO	1	1
	NRR SHANKMAN, S	1	1	NRR/DEST DIR	1	1
	NRR/DLPQ/PEB 11	1	1	NRR/DLPQ/QAB 10	1	1
	NRR/DOEA DIR 11	1	1	NRR/DREP/EPB 10	1	1
	NRR/DREP/RPB 10	2	2	NRR/DRIS DIR 9A	1	1
	NRR/PMAS/ILRB12	1	1	NUDOCS-ABSTRACT	1	1
	OE LIEBERMAN, J	1	1	OGC/HDS2	1	1
	<u>REG FILE 02</u>	1	1	RGN2 FILE 01	1	1
EXTERNAL:	LPDR	1	1	NRC PDR	1	1
	NSIC	1	1			

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 25 ENCL 25

R
I
D
S
/
A
D
D
S

R
I
D
S
/
A
D
D
S

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

Hal B. Tucker
Vice President
Nuclear Production
(704)873-4531



DUKE POWER

April 17, 1989

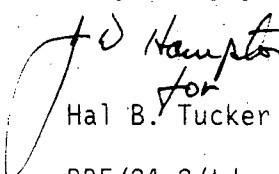
U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Inspection Report 50-269, -270, -287/89-07

Gentlemen:

By a NRC letter dated March 16, 1989 a notice of Deviation and Inspection Report 50-269, -270, and 287/89-07 was transmitted to me. As required by 10 CFR 2.20, I am submitting a written response to the deviation identified in the inspection report.

Very truly yours,


for
Hal B. Tucker

RRE/24-2/td

Attachment

cc: Mr. S. D. Ebnetter
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, NW, Suite 2900
Atlanta, GA 30323

Mr. P. H. Skinner
NRC Resident Inspector
Oconee Nuclear Station

Mr. D. B. Matthews
Office of Nuclear Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

8904260393 890417
FDR ADDCK 05000269
Q FDC

TEO
||

NOTICE OF DEVIATION

In Duke Power Company document, "Regulatory Guide 1.97, Revision 2 - Review for Oconee Nuclear Station", transmitted September 28, 1984, they committed to comply with Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant Environs Conditions during and following an accident", unless specific exceptions were described.

Page 5-7 of the Oconee Review document states, "dedicated control board displays for the instruments designated as Types A, B and C, Category 1 or 2 and qualified for use throughout all phases of an accident will be specifically identified on the control panels so that the operator can discern that they are available for use under accident conditions."

Page 5-6 of the Oconee review document states, "recording of instrumentation readout information is provided for at least one of the redundant channels." It also states, "the trend or transient information will be available on dedicated recorders or stored in computer memory for display on demand."

Page 5-8 of the Oconee review document states, "servicing, testing, and calibration programs are specified to maintain the capability of the monitoring instrumentation."

These statements and commitments are consistent with the requirements of Regulatory Guide 1.97.

RESPONSE 1

1. Admission or denial of the alleged deviation:

Deviation is admitted

2. Reason for deviation:

ONS-I&E had not been made knowledgeable of the designation of these devices as Regulatory Guide 1.97 equipment. ONS-I&E had not been notified of the Duke Power Commitment that all Regulatory Guide 1.97 equipment would be included in a calibration/preventive maintenance program. Previously, the uncalibrated status of these devices had not affected their ability to perform the function for which they were utilized which was to indicate the presence or absence of output voltage.

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

Discovery of the lack of a calibration program for these devices predated this NRC inspection and development of a procedure to rectify this deficiency was underway at the time of the inspection.

4. corrective steps which will be taken to avoid further deviations:

- (1) At the request of ONS-I&E Transmissions Department will be responsible for calibration/repair of these devices.
- (2) Transmission Department is now developing a procedure to control calibration/PM of these devices.

Expected completion date: Last Quarter of 1989.

- (3) Standing Work Requests for all three Units will be created for performing the Transmissions procedure as soon as it is developed. SWR's will be performed each refueling outage.
Expected start date: Unit 3 refueling outage - December 1989.

5. Date of full compliance:

At this time full compliance is scheduled to be achieved after Unit 2 EOC 11 refueling outage.

Duke Power Company

Oconee Nuclear Station

Reply to a Notice of Deviation
NRC Inspection Report 50-269, -270, -287/89-07

DEVIATION

In Duke Power Company document, "Regulatory Guide 1.97, Revision 2 - Review for Oconee Nuclear Station," transmitted September 28, 1984, they committed to comply with Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant Environs Conditions during and following an accident", unless specific exceptions were described.

Page 5-7 of the Oconee review document states, "dedicated control board displays for the instruments designated as Types A, B and C, Category 1 or 2 and qualified for use throughout all phases of an accident will be specifically identified on the control panels so that the operator can discern that they are available for use under accident conditions."

Page 5-6 of the Oconee review document states, "recording of instrumentation readout information is provided for at least one of the redundant channels." It also states, "the trend or transient information will be available on dedicated recorders or stored in computer memory for display on demand."

Page 5-8 of the Oconee review document states, "servicing, testing, and calibration programs are specified to maintain the capability of the monitoring instrumentation."

These statements and commitments are consistent with the requirements of Regulatory Guide 1.97.

Contrary to the above:

- (a) Dedicated control board displays for the instruments designated as Types A, B, and C, Category 1 or 2 were not specifically identified:
- (b) Trend information for the following four variables was not available on dedicated recorders nor stored in computer memory for display on demand:
 - 1. RCS hot leg water temperature
 - 2. Auxiliary feedwater flow
 - 3. Steam generator level
 - 4. Degrees of subcooling
- (c) The inverter output voltmeters [defined as Type D, Category 2 in the RG] were not included in the calibration program, and had not been calibrated since the original construction of the units according to records.

Response

(1) Admission or denial of the deviation:

Duke Power admits that for Part (a) and (c) of the deviation occurred as stated; however, for Part (b), of the deviation, Duke Power takes exception that a deviation exists.

(2) The reasons for the deviation:

(a) The reason for the deviation was due to an oversight in the review of the appropriate licensing documents for information to be incorporated into the design process. The commitment to provide an unique way to identify these instruments to the operator was not incorporated into the design process.

(c) The reason for the deviation was due to an oversight in that the Oconee Nuclear Station, I&E Section was not aware of the designation of these devices as Regulatory Guide 1.97 equipment, nor were they aware of the commitment made that all Regulatory Guide 1.97 equipment would be included into a calibration/preventive maintenance program. Previously, the uncalibrated status of these devices (inverter output voltmeters) had not affected their ability to perform the function for which they were utilized which was to indicate the presence or absence of output voltage.

(3) The reason for taking exception to part (b) of the deviation:

For most Category 1 variables for Oconee, Duke has committed to install dedicated, qualified recorders for one channel. However, Duke does not consider direct and immediate trend or transient information of the following variables essential for operator information or action:

1. RCS hot leg water temperature
2. Auxiliary feedwater flow
3. Steam generator level
4. Degrees of subcooling

The Oconee Regulatory Guide 1.97 submittal specifically noted that the subject variables were input to the plant computer and available for trend recording on demand. Given that these provisions have been made, it is Duke Power's position that the company has fully complied with its Regulatory Guide 1.97 commitment and that this case is not an example of a deviation.

Upon further review, however, Duke Power does feel that continuous monitoring of these variables could enhance post disturbance event review and plans to add dedicated, non-safety grade recorders to monitor one channel of each variable. These recorder additions are not considered an expansion of Duke Power's Regulatory Guide 1.97 commitments.

- (4) The corrective steps which have been taken and the results achieved:
- (a) Duke Power has specifically identified all of the dedicated control board displays for Oconee Regulatory Guide 1.97 related instruments designated as Types A, B, and C, Category 1 or 2 that are currently installed and in service in Units 1, 2, and 3 so that the operator can easily discern that they are intended for use under accident conditions.
 - (c) Duke Power had identified prior to the NRC Inspection that a calibration program for these devices did not exist. The development of a procedure to rectify this deficiency was underway at the time of the inspection.
- (5) The corrective steps which will be taken to avoid further deviations:
- (a) Duke Power will specifically identify the control board displays for new Oconee Regulatory Guide 1.97 related instruments designated as Types A, B, and C, Category 1 or 2 as an integral part of the installation of future instruments, and prior to placing the display in service.
 - (c) A procedure to control the calibration/preventive maintenance of these devices is under development for implementation. After implementation of this procedure a Standing Work Request (SWR) for all three units will be issued to require that this procedure be performed at each refueling outage.
- (6) The date when corrective actions will be completed:
- (a) The station modification to specifically identify the Regulatory Guide 1.97 related instruments already in service in Units 1, 2, and 3 was completed on March 28, 1989; therefore, this part of the deviation has been resolved.

The design process to assure that the appropriate remaining Regulatory Guide 1.97 instruments to be implemented are uniquely identified is in place.

- (c) The procedure to control the calibration/preventive maintenance of these devices will be completed by January 1, 1990. The expected issuance date for the SWR is prior to the upcoming Unit 3 refueling outage, scheduled to begin December, 1989.