DUKE POWER COMPANY

POWER BUILDING

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A. C. THIES SENIOR VICE PRESIDENT PRODUCTION AND TRANSMISSION P. O. Box 2178

January 17, 1975

Mr. Norman C. Moseley, Director Directorate of Regulatory Operations U. S. Atomic Energy Commission Region II - Suite 818 230 Peachtree Street, Northwest Atlanta, Georgia 30303

Re: RO Inspection Report 50-269/74-10 50-270/74-8 50-287/74-11

Dear Mr. Moseley:

Attached herewith is information supplementing our response to RO Inspection Report Nos. 50-269/74-10, 50-270/74-8, and 50-287/74-11, which was transmitted on December 19, 1974. In our letter of December 19, 1974, general actions taken to improve the effectiveness of our management control systems were identified. It should be noted, however, that in addition to those general actions the attachment to our December 19, 1974 letter and the present attachment identify specific actions taken with regard to the various items discussed to improve our management control systems. It is felt that the combination of the specific and general actions identified are serving to significantly improve the effectiveness of the management control system for the operation of Oconee Nuclear Station.

Very truly yours,

A. C. Thies

ACT:vr Attachment SUPPLEMENTARY RESPONSES
TO
AEC/RO INSPECTION REPORT
50-269/74-10, 50-270/74-8, 50-287/74-11

January 17, 1975

## 1. Supplementary Response to Item I.A.1.t:

As identified in our response of December 19, 1974, periodic tests with a frequency of greater than weekly are to be scheduled by means of a computer program prepared for that purpose. Periodic tests which are performed on a frequency of weekly or less (e.g., each shift, daily, three times per week) are executed on a routine, essentially continuous, basis and are controlled (scheduled) administratively to assure proper performance. This administrative control includes standing orders, written procedures, assignment of responsibility to specific individuals, and/or other appropriate measures.

## Supplementary Response to Item I.A.1.c:

- (1) As stated in our response of December 19, 1974, it is felt that since the date of the subject incident, i.e., March, 1973, that the control of the preparation, review and approval of procedures has continually improved. This is evidenced by the fact that although PT/0/A/0204/09 apparently was not originally reviewed by the Station Review Committee (SRC), the July, 1974, revision to the procedure did receive SRC review. To assure that documentary evidence is available of SRC review of procedures, minutes of each SRC meeting are prepared by a designated individual which record the items addressed during that meeting. These minutes are retained in the station Master File. Also, a copy of each procedure reviewed by the SRC, notated as having received SRC review and including any comments made by the SRC, is placed in the Master File with the applicable procedure.
- (2) The Technical Services Engineer, who functions as Chairman of the SRC, periodically reviews station operating records and initiates an investigation of those incidents determined to warrant SRC review. In addition to incidents determined to be reportable as Abnormal Occurrences, Unusual Events or violations of Technical Specifications, other significant incidents which could affect station operation and safety are investigated and a report prepared. Each such report is reviewed by the SRC with regard to the impact of the incident on station safety and any corrective action(s) which may be necessary.

## 3. Supplementary Response to Item I.A.1.d:

A report with regard to the subject incident is being prepared and will be reviewed by the Station Review Committee. An Unusual Event Report will be submitted to the Directorate of Regulatory Operations by January 31, 1975. With regard to measures taken to prevent the recurrence of similar incidents, refer to our response to Item I.A.1.c(2).

## 4. Supplementary Response to Item I.A.1.j:

Our response of December 19, 1974, described our intentions with regard to formally training Level 1 audit personnel. It should be noted, however, that the present Level 1 audit personnel have been at Oconee for a number of years and have acquired valuable experience by on-the-job training in various aspects of nuclear unit operation, including some formal reactor operations training in the case of one individual. It is recognized though that formal reactor operations training for Level 1 auditors is both desirable and necessary. The training previously described will begin on March 10, 1975, and will continue at a rate of approximately 20 hours per week on alternate weeks until complete. In the interim, vatil such time as the present personnel receive the formal training previously described, an individual qualified in reactor operations will assist in the performance of Level 1 audits of reactor operations. This individual is a member of the Quality Assurance Department and is fully qualified both as a reactor operator and as a quality assurance auditor.