

DUKE POWER COMPANY

POWER BUILDING

422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28242

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

December 6, 1977

TELEPHONE AREA 704
373-4083

Mr. James P. O'Reilly, Director
U. S. Nuclear Regulatory Commission
Suite 1217
230 Peachtree Street, Northwest
Atlanta, Georgia 30303

RE: RII:CEA
50-269/77-20
50-270/77-20
50-287/77-20

Dear Sir:

My letter of November 1, 1977 provided a response to Inspection Report 50-269, -270, -287/77-20. Further information with regard to this matter is provided below.

Pursuant to Oconee Nuclear Station Technical Specification 6.4.1, a number of procedures are provided for the operation and maintenance of the station. These procedures vary with regard to their degree of specificity. This is due to the fact that written procedures cannot address all contingencies and must contain a degree of flexibility appropriate to the activities to be performed. For example, the exact details of a particular maintenance activity are usually not determinable until after initial troubleshooting has been performed and may not be the same for repetitive work on the same equipment. Recognition of the need for flexibility in procedures and of the need to adequately control such flexibility is considered to be provided by American National Standard ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants", which states in part that procedures "shall be sufficiently detailed for a qualified individual to perform the required function without direct supervision".

Accordingly, two methods of procedural control are being provided at Oconee:

- (1) Procedures may be written to allow a cognizant supervisor or other qualified personnel to selectively apply portions of a procedure as determined appropriate. In other words, at the time of review and approval, a procedure may provide for certain flexibility in its performance. An example would be a general maintenance procedure which directs qualified personnel to

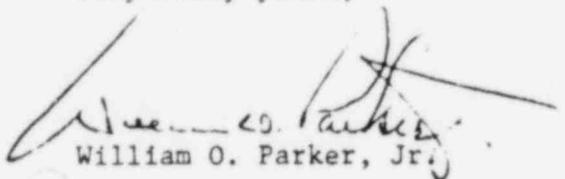
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utilize, in the sequence necessary, those steps considered applicable to the work to be performed. Those portions of the procedure not executed at a given time would then be marked as "not applicable".

- (2) Procedures not specifically written to allow selectivity with regard to steps or sequence will be controlled pursuant to Oconee Station Directive 4.2.1, provided such selectivity does not alter the intent of a procedure. Station Directive 4.2.1 provides that in order for steps of an affected procedure to be marked as "not applicable" or to be performed in a sequence other than as listed in the procedure, concurrence must be obtained from at least two individuals, one of whom is a cognizant supervisor, and that this concurrence be documented.

Variations in procedure sequence or applicability which do alter the intent of a procedure will of course continue to be considered and processed as procedure changes pursuant to Technical Specification 6.1.2.1.a.

Very truly yours,



William O. Parker, Jr.

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