

DUKE POWER COMPANY

POWER BUILDING

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

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

August 4, 1977

TELEPHONE: AREA 704
373-4083

Mr. Dudley Thompson, Acting Director
U. S. Nuclear Regulatory Commission
Suite 818
230 Peachtree Street, Northwest
Atlanta, Georgia 30303

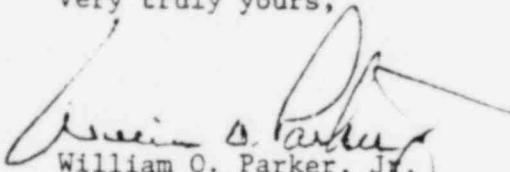
RE: IE:II:TNE
50-269/77-9
50-270/77-9
50-287/77-9

Dear Mr. Thompson:

With regard to your letter of July 13, 1977, Duke Power Company does not consider information contained in IE Inspection Report 50-269, -270, -287/77-9 to be proprietary.

Please find attached our response to "Notice of Violation", Items A and B.

Very truly yours,


William O. Parker, Jr.

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Attachment

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ITEM A

Section 17.2.5 of the Duke Power Company Quality Assurance Program Topical Report which implements Criterion V of Appendix B to 10CFR50 requires in part that the written instructions and procedures contained in the Administrative Policy Manual (APM) be implemented by personnel as it pertains to the performance of their activities. Section 3.1.3 of the APM requires in part that structures, systems and components which are in other-than-normal status be identified as such by use of tags, labels, stamps, status logs or other suitable methods.

Contrary to the above, on June 16, 1977, one string of the Unit 2 reactor building fire detectors were found to be inoperable due to lifted leads and a dummy load resistor installed in the fire detection equipment cabinet. The inoperable status of this equipment was not identified by tagging or inclusion in the out-of-normal log and the licensee was unable to determine when the system was rendered inoperable.

RESPONSE

Appendix B to 10CFR50 states, in part:

"Nuclear power plantsinclude structures, systems and components that prevent or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public. This appendix establishes quality assurance requirements for the design, construction, and operation of those structures, systems, and components."

That is, Appendix B is applicable to safety-related structures, systems, and components and activities associated therewith. Criterion II of the Appendix then requires, in part, that:

"The applicant (licensee) shall identify the structures, systems, and components to be covered by the quality assurance program....."

Section 17.2 of the Duke Power Company Topical Report "Quality Assurance Program" describes the operational quality assurance program applicable to Oconee Nuclear Station safety-related structures, systems and components and in reference to the above provision of Criterion II states that for each nuclear unit, "those structures, systems and components which are considered to be nuclear safety-related are identified."

Pursuant to Appendix B and the Topical Report, those structures, systems and components which are considered nuclear safety-related at Oconee have been identified in a document entitled, "Safety-Related Structures, Systems and Components." The criteria on which this identification is based are given in the document and, due to the lack of any formal definitive regulatory provisions, are derived from various applicable codes,

standards, etc. Fire protection equipment, per se, is not considered as being safety-related. Therefore, Duke Power Company does not consider the above stated apparent item of noncompliance to be valid.

In our letter of March 1, 1977 to Mr. Benard C. Rusche, Director, Office of Nuclear Reactor Regulation, NRC, Duke described plans for implementation of a quality assurance program for fire protection equipment. In this letter the distinction between fire protection equipment and nuclear safety-related items was made, consistent with previous Commission guidance. In responding to a staff request, the letter did state, however, that the existing (Appendix B) quality assurance program for nuclear safety-related structures would be applied to non-safety-related fire protection equipment by September 1, 1977, with one identified exception. Therefore, at the time of the subject inspection, Duke was also not in noncompliance with commitments concerning application of a quality assurance program for non-safety-related fire protection equipment.

Duke does recognize the importance of fire protection equipment based on good operating practice. Accordingly, the particular item cited above was promptly included in the out-of-normal log and action was initiated to restore the equipment to operable status. The necessity of proper documentation and control of out-of-normal equipment has been re-emphasized to appropriate personnel. Also, the control room procedure for acknowledging alarms is being revised by August 30, 1977 to include guidance on fire alarms not initiated by a fire. As previously stated, however, Duke does not consider that a regulatory item of noncompliance occurred in this instance and wishes the record to so reflect.

ITEM B

Section 17.2.12 of the Duke Power Company Quality Assurance Program Topical Report which implements Criterion XII of Appendix B to 10CFR50 requires in part that records contain a history of device calibrations and repairs. Section 4.2.9.2 of the Administrative Policy Manual (APM) requires in part that completed procedures which affect station safety-related structures, systems or components be retained for a minimum of six years. Section 4.2.3.2 of the APM also requires that procedures which affect station safety-related structures, systems or components be designated as "A" procedures.

Contrary to the above, the inspector found many instrument calibration procedures which affect safety-related structures, systems or components which were not designated as "A" procedures and which the licensee was retaining the completed procedure for only the most recent calibration of the particular system. Specific examples include:

- (1) IP/O/B/204/1B - Reactor Building Spray Flow Instrument Calibration
- (2) IP/O/B/270/5E - Emergency Feedwater Flow Instrument Calibration
- (3) IP/O/B/202/1N - HPI Pump Discharge Pressure Instrument Calibration

RESPONSE

The applicability of Appendix B to 10CFR50 and the designation of nuclear safety-related structures, systems and components at Oconee Nuclear Station is discussed in the response to Item A, preceeding. To assure implementation, in part, of Appendix B the "Administrative Policy Manual for Nuclear Stations" requires that procedures which affect (i.e., are concerned or associated with) station safety-related structures, systems and components be so designated (by identification as "A" procedures) and then places certain control requirements on such procedures. With regard to the above listed examples, the procedures are not considered to be applicable to safety-related structures, systems or components. Therefore, the Duke Power Company does not consider that the citation for an apparent regulatory item of noncompliance is valid and wishes the record to so reflect.