

DUKE POWER COMPANY

POWER BUILDING

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

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

TELEPHONE: AREA 704
373-4083

October 24, 1975

Mr. Norman C. Moseley, Director
U. S. Nuclear Regulatory Commission
Suite 818
230 Peachtree Street, Northwest
Atlanta, Georgia 30303

Re: IE:II:TNE
50-269/75-10
50-270/75-11
50-287/75-11

Dear Mr. Moseley:

Duke Power Company does not consider information contained in the subject IE inspection report to be proprietary.

Responses to Items I.A.1, I.A.2, and I.A.3 are attached. Additionally, with regard to actions taken to improve the effectiveness of management control systems, the following response is provided.

Duke Power Company has recognized that during the operational life of a nuclear station, various individuals and organizations external to the station interface with the station organization with regard to operating, testing and maintenance activities. In order to assure that the activities of interfacing individuals or organizations do not compromise the safety of the station or the quality of its safety-related structures, systems, or components, the nuclear station is responsible for control of these interfacing individuals and organizations. This basic policy is contained in the Steam Production Department "Administrative Policy Manual for Nuclear Stations," (APM).

In order to improve the interfacing relationship and to establish more detailed procedures to be used in interfacing, Steam Production Department personnel met at Oconee on June 13, 1975. The basic premise was again reiterated that the policy must be that Oconee Nuclear Station is responsible for controlling the activities of external organizations. The basic policies contained in the APM were expanded on and more specific positions were established concerning the following areas: assignment of interface responsibilities to specific members of the station staff;

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procedures for safety-related structures, systems and components; material procurement; preventative maintenance program; station modifications; and personnel qualifications. These policies were sent to Managers of the Steam Production Department for review by letter dated July 16, 1975 and to all external interfacing departments for review by letter dated August 21, 1975.

On September 9, 1975, a meeting was held with all company departments that interface with Oconee Nuclear Station to discuss the proposed policies. These policies were agreed to by all departments. Minutes of this meeting were distributed to all attendees to document these agreements.

With respect to the incident reported in Abnormal Occurrence Report AO-269/75-8, letters were sent on July 24, 1975 to the Vice President, Transmission and Electric Installations; Vice President, System Planning; Assistant Vice President, Operations; Manager, Lee Steam Station; and Manager, Transmission Engineering, that described the occurrence and reiterated the importance of supplying the combustion turbine at Lee through the isolated 100 kV transmission line on a timely basis as requested by Oconee Nuclear Station. In addition, the letter requested that any present or future ties to the 100 kV transmission line be capable of being remotely isolated from Oconee.

On two separate occasions, Mr. A. C. Thies, Senior Vice President, Production and Transmission, has met with all departments to establish these policies and to assure himself that they are properly understood.

It is considered that the actions summarized above, which have already been accomplished, and those outlined in the attached responses will assure the effectiveness of the management control systems at Oconee.

Very truly yours,

W. O. Parker, Jr.
William O. Parker, Jr. *WOP*

MST:vr
Attachment

DUKE POWER COMPANY

OCONEE NUCLEAR STATION

RESPONSE TO

IE INSPECTION REPORT NOS. 50-269/75-10, 50-270/75-11,
50-287/75-11

October 24, 1975

Item 1

Contrary to Oconee Technical Specification 3.7.4(a) on July 4, 1975 a Lee combustion turbine unit was not made available to Oconee, as a backup source of emergency electrical power, within the required time.

This infraction had the potential for causing or contributing to an occurrence related to safety.

RESPONSE

Investigation into this incident has confirmed that the area dispatchers are, and always have been, aware of the right and authority of Oconee Nuclear Station to use the 100 kV transmission line whenever necessary to meet its requirements for backup emergency power. During the time in question, the dispatchers were under the impression that Oconee did not object to waiting until the end of the allowable maintenance period to obtain the combustion turbine and isolated transmission line. Further, the design of the transmission system provides the capability for Oconee to remove control of the associated switchgear at the Central Switchyard from the area dispatchers.

The following corrective actions have been taken to further assure that incidents of this type do not occur in the future.

1. A task force has been established to study all procedures interfacing Oconee, Lee and the area dispatcher to determine that they are the best possible and to assure consistency in lines of communications and operation.
2. A conservative interpretation of the time required for backup emergency power has been discussed with the Operations Department, Oconee, the area dispatchers and Lee Steam Station personnel. This will provide backup emergency power with a Lee combustion turbine or the isolated 100 kV transmission line within 30 minutes of the determination that a Keowee outage will exceed 24 hours. This interpretation will be used until clarification can be obtained from NRC/DRL or the specification can be revised.
3. Further training programs are being established and will be administered to area dispatchers, system dispatchers, Lee operating personnel, Steam Production Department operating personnel, and Central Switchyard operations personnel to ensure wide dissemination of the requirements which are placed upon Oconee Nuclear Station and the importance of them.

Item 2

Contrary to Oconee Technical Specification 6.4.1(a) procedures were not followed during the attempt to use a Lee combustion turbine unit for a backup source of emergency electrical power.

This infraction had the potential for causing or contributing to an occurrence related to safety.

RESPONSE

Investigation into this incident and discussions with the area dispatchers have confirmed that they understand that they do not have the authority to direct either Lee Steam Station or Oconee personnel to vary from approved procedures.

In addition, the following corrective action has been taken to prevent recurrence of this incident.

1. Oconee and Lee Steam Station procedures have been revised to more clearly define actions to be taken in the event backup emergency power is needed from the Lee combustion turbine during a Keowee outage.
2. A letter to the Superintendent of the Lee Steam Station, dated July 24, 1975 has stressed the importance of assuring the capability of the combustion turbine through strict adherence to established procedures.

Item 3

Contrary to Oconee Technical Specification 6.4.1(e) maintenance activities at the Keowee Hydro Station were not properly controlled as stated in section 2.7.1 of the licensee's Administrative Policy Manual.

RESPONSE

The subject of interfacing between the various departments within Duke Power Company and the Oconee Nuclear Station has been undergoing review for some time. It was recognized from several earlier incidents that control of these outside organizations by the nuclear station was mandatory. A meeting has been held on June 13, 1975 with various members of the Steam Production Department to establish these policies. A meeting on September 9, 1975 has also been held with the management of other departments within the Duke Power Company which interface with Oconee Nuclear Station.

The basic policy established is that the activities of all external individuals/ organizations at an operational nuclear station are to be controlled by that station organization. The activities performed at the station by external organizations and the basic agreements reached are as follows:

(1) Procedure Requirements

Procedures prepared by interfacing departments for safety-related activities must be approved by station management and the master and control copies of these procedures will be retained at the station.

(2) Materials Requirements

All parts and components for safety-related structures, systems and components will be ordered and maintained by the station materials group. Each interfacing department will provide the station with material stocking requirements.

(3) Modifications

Modifications may be requested by interfacing organizations; however, all modifications will be approved by station management and implementation of the modification will be controlled by the station.

Implementation of these aspects of interface control are being pursued at present.