DUKE POWER COMPANY

POWER BUILDING

422 South Church Street, Charlotte, N. C. 28242

WILLIAM O. PARKER, JR. VICE PRESIDENT STEAM PRODUCTION

July 14, 1981

TELEPHONE: AREA 704 373-4083

OFFICIAL COPY

Mr. James P. O'Reilly, Director U. S. Nuclear Regulatory Commission Region II 101 Marietta Street, Suite 3100 Atlanta, Georgia 30305

Re: Oconee Nuclear Station Docket No. 50-269

Dear Mr. O'Reilly:



Please find attached Reportable Occurrence Report RO-269/81-13. This report is submitted pursuant to Oconee Nuclear Station Technical Specification 6.6.2.1.a(2) which concerns operation less conservative than the least conservative aspect of a LCO, and describes an incident which is considered to be of no significance with respect to its effect on the health and safety of the public.

Very truly yours, L William O. Parker

JLJ:pw Attachment

Cc: Director Office of Management & Program Analysis U. S. Nuclear Regulatory Commission Washington, D. C. 20555 Mr. Bill Lavallee Nuclear Safety Analysis Center P. O. Box 10412 Palo Alto, CA 94303

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DUKE POWER COMPANY OCONEE NUCLEAR STATION

Report Number: RO-269/81-13
Report Date: July 14, 1981
Occurrence Date: June 30, 1981
Facility: Oconee Nuclear Station, Seneca, South Carolina
Identification of Occurrence: Deficiency Discovered in "Normal Power" Procedure
Conditions Prior to Occurrence: Oconee 1 - Cold S/D
Oconee 2 - ~100% FP
Oconee 3 - ~100% FP

Description of Occurrence: On three separate occasions (October 29, 1980, April 9, 1981, and April 26, 1981) the backup function of the Isolating and Transfer Diodes in the 125 VDC Instrumentation and Control System was disabled for all four channels on all three Oconee Units. It is conceded that this was also done at other times not mentioned here. By Frocedure OP/1,2,3/A/1107/02 "Normal Power", these diodes were taken out of service in order to detect the location of a ground on the 125 VDC system. By disabling these diodes, the redundancy of one unit's batteries backing up another unit's DC loads is defeated on more than one DC string as defined in Technical Specification 3.7.2(d)3. This procedure is performed when a ground is detected on one Oconee unit, but the procedure itself affects the isolating and transfer diodes on all three Oconee Units. Therefore, the event occurred on all three units at the same time. This is in violation of Technical Specifications 3.7.1(e) and 3.7.2.d(3) and is thus reportable pursuant to Technical Specification 6.6.2.1.a(2).

<u>Apparent Cause of Occurrence</u>: The apparent cause of the incident is a misinterpretation of Technical Specification 3.7 when the procedure was originally written in 1974.

<u>Analysis of Occurrence:</u> The only place that a single failure could occur that would affect both batteries of any Oconee Unit's I&C DC system would be in the battery room. During the time that the units were separated there was no fire, explosion, or other single failure of sufficient magnitude to disable any units I&C DC systems. It should be noted that the normal period of time for the units to be separated is less than 1 hour. Therefore, the probability of a failure during this short time period is quite low. Thus, the health and safety of the public were not endangered.

<u>Corrective Action</u>: The immediate corrective action was the initiation of a proposed change to Oconee Technical Specification 3.7 which would allow the separation of all three units' I&C, DC system via the isolating and transfer diodes for a period not to exceed 24 hours. This proposal is still under review by NRC. A means of physical separation for batteries CA and CB will be investigated to determine its practical justification. A change to the "Normal Power" procedure that verifies that the unit's batteries CA and CB are not tied together through the DC tie breaker when isolating the unit from its backup unit will be processed.