

DUKE POWER COMPANY

POWER BUILDING

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

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

September 11, 1981

TELEPHONE: AREA 704
373-4083

Mr. James P. O'Reilly, Director
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Subject: McGuire Nuclear Station
Docket No. 50-369

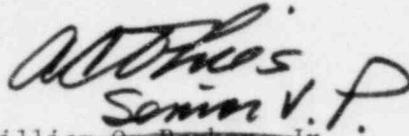
Reference: RII:MJG
50-369/81-16

Dear Mr. O'Reilly:

Please find attached a response to violations 50-369/81-16-01, 02, 03, 04, and 07 which were identified in the above referenced inspection report. Duke Power Company does not consider any information contained in this report to be proprietary.

I declare under penalty of perjury that the statements set forth herein are true and correct to the best of my knowledge.

Very truly yours,


William O. Parker, Jr.

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Attachment

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MCGUIRE NUCLEAR STATION

RESPONSE TO I. E. INSPECTION REPORT 50-369/81-16

Violation 50-369/81-16-01, Severity Level VI:

10 CFR 50, Appendix B, Criterion XIII as implemented by Duke Power Company Topical Report Duke 1-A, Section 17, paragraph 17.1.13 requires that measures be taken to control storage of equipment to prevent damage.

Contrary to the above, in safety injection pump room MI-P-1B, scaffolding was installed on safety-related piping with no evidence of measures being taken to prevent damage to the piping.

Response:

1. Duke Power Company admits to the violation.
2. This violation is the result of station personnel being unfamiliar with this particular requirement of 10CFR50.
3. The scaffolding in question was immediately removed from the safety-related piping.
4. A station directive is currently being developed which will establish appropriate restrictions on the placing of scaffolds on safety-related equipment. This directive will be written and issued by October 1, 1981.

The group responsible for erecting scaffolding has been instructed not to place any scaffolding on safety-related equipment until the station directive is issued.

5. The station is presently in full compliance.

Violation 50-369/81-16-02, Severity Level V:

Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained for safety-related equipment. Procedure OP/O/A/6100/09 "Removal and Restoration of Station Equipment from Service" has been established to control the status of plant equipment.

Contrary to the above, on May 27, 1981, OP/O/A/6100/09 was not implemented in its entirety when removing control room ventilation train A filters from service. The safety-related portions of the procedure were not implemented in that filter retesting was not designated as required, entries were not made in the control room logs, and control room ventilation train A was not removed from service. As a result of this violation, the filters were returned to service inoperable with respect to Technical Specification 4.7.6. Failure to identify this inoperability resulted in violations of Technical Specification 3.7.6 and 3.0.4.

Response:

1. Duke Power Company admits to the violation.
2. This violation is the result of the personnel involved making an error in not correctly identifying the control room ventilation filters as safety-related.
3. Cooldown to Mode 5 was initiated at 1002 on May 29, 1981, as required by Tech. Spec. 3.7.6. Both control room ventilation filter trains were retested satisfactorily on the same day.
4. Station personnel have received additional instructions in properly identifying problems associated with the control room filters and the proper actions to be taken.
5. The station is presently in full compliance.

Violation 50-369/81-16-03, Severity Level V:

Technical Specification 6.8.1 requires written procedures to be established, implemented and maintained for safety-related activities. OP/1/A/6100/02 "Controlling Procedure for Unit Shutdown" has been established for that purpose.

Contrary to the above, on June 2, 1981, OP/1/A/6100/02 was not implemented correctly in that it was joined in progress without meeting the normal plant conditions prerequisite to the remainder of the procedure. A procedure reflecting the actual plant condition was not established. The result of the violation was voiding in the primary system.

Response:

1. Duke Power Company admits to the violation.
2. The personnel involved made an error in deciding to deviate from the established procedure for plant cooldown without performing an evaluation and properly revising the approved procedure.
3. Operation's personnel have been counseled concerning the importance of following established procedures. Additionally, OP/1/A/6100/02 has been revised to include sign off steps to verify that all loop temperatures are less than 160°F, all Steam generator pressures are zero, and all vessel head thermo-couples are below 200°F prior to stopping all reactor coolant pumps. A caution was also added to state that reactor coolant system pressure shall not be reduced below 100 psig until the above criteria are met.
4. Controls are presently in place for developing procedures in response to abnormal plant conditions.
5. The station is presently in full compliance.

Violation 50-369/81-16-04, Severity Level V:

Technical Specification 6.8.1 requires written procedures to be established, implemented and maintained. OP/1/A/6100/10J, "Annunciator Response for Panel 1AD9" has been established to describe response required for alarms on that panel. This response includes a number of Immediate Actions.

Contrary to the above, on June 13, 1981, alarm A-5 on the 1AD9 panel was not investigated for over 6 hours after alarming, and the Immediate Actions described by OP/1/A/6100/10J were not implemented immediately.

Response:

1. Duke Power Company admits to the violation.
2. The personnel involved made an error in not performing the action required by OP/1/A/6100/10J upon receipt of the alarm. A contributing factor was the fact that routine access through the ice condenser lower personnel door causes this alarm to come on frequently.
3. Operation's personnel have been counseled concerning the importance of properly responding to annunciator alarms.
4. The alarm logic has been revised to eliminate numerous alarms associated with routine access through the ice condenser personnel door.
5. The station is presently in full compliance.

Violation 50-369/81-16-07, Severity Level VI:

Technical Specification 4.11.1.5 requires that "...the quantity of the radioactive material in each batch of slurry (used powdex resin) to be transferred to the chemical treatment ponds shall be determined to be within...(limits)...by analyzing a representative sample... Estimates of the Sr-90 and Sr-89 batch concentration shall be included based on the previous monthly composite analysis".

Contrary to the above, on March 6, 9, 27, April 3, 13, 24, May 6, 22, and June 8 and 11, 1981, releases of slurry were made to the chemical treatment pond with Sr-89 and Sr-90 concentrations estimated on activity not analysis. No composite samples were retained. No activity was involved as the plant was not yet critical.

Response:

1. Duke Power Company admits to the violation.
2. This violation occurred due to the following reasons:
 - a) This particular surveillance requirement is located in the footnote of a definition. All other sampling and analysis are contained in a table outlining the sampling and analysis program.

- b) Station personnel who were aware of this surveillance requirement regarded it as being applicable only following the first primary to secondary leak, or as referring to the quarterly conventional waste water treatment composite analysis identified in Table 4.11-1.
- 3. The powder resin discharges are now composited and a vendor performs the Sr-89 and Sr-90 analysis.
- 4. A change request to the Technical Specifications clarifying this requirement has been submitted (8/12/81).
- 5. The station is presently in full compliance.