

DUKE POWER COMPANY

POWER BUILDING

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WILLIAM O. PARKER, JR.
VICE PRESIDENT
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TELEPHONE: AREA 704
373-4083

August 20, 1981

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 Nos. 50-369 and 50-370

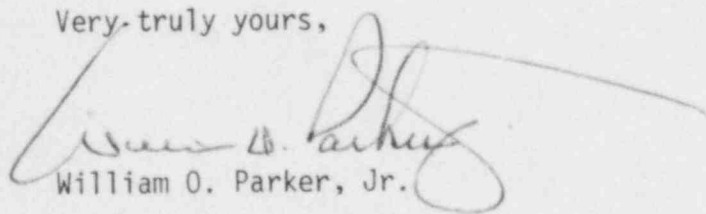
Reference: RII:GAB
50-369/81-17
50-370/81-05

Dear Mr. O'Reilly:

Please find attached a response to violations 50-369/81-17-01, 02, 03, 04, and 05. Also included is a description of actions taken or planned to resolve open item 50-369/78-39-29 which was requested in Mr. R. C. Lewis's July 21, 1981 letter transmitting the Inspection Report. Note that the corrective steps which will be taken to avoid further violations (Response Element #4) for violation 50-369/81-17-02 are not yet determined. Information concerning this will be supplied by September 30, 1981. 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 50-369/81-17 AND 50-370/81-05

Violation 50-369/81-17-01, Severity Level V:

10 CFR 50, Appendix B Criterion V and the accepted Quality Assurance (QA) Program (DUKE-1-A), Section 17.2.5, require that activities affecting quality shall be prescribed by documented procedures. The accepted QA Program Table 17.0-1 endorses ANSI-N 18.7-1976. Paragraph 5.2.12 of this Standard requires that plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years.

Contrary to the above, Station Directives (SDs) 2.1.3, 2.1.4, 2.4.0, 3.8.0, 3.10.0, 3.1.3, and 3.1.10 have not been reviewed or revised since 8/78, 5/79, 6/78, 3/79, 3/79, 5/77, and 10/77, respectively. These SDs are not intended to be all inclusive.

Response:

1. Station Directives 2.1.3, 2.1.4, 2.4.0, 3.8.0, 3.10.0, 3.1.3, and 3.1.10 have not been reviewed or revised since 8/78, 5/79, 6/78, 3/79, 3/79, 5/77, and 10/77 respectively.
2. Station personnel were not aware this requirement applied to Station Directives as well as permanent Station Procedures (i.e., operating procedures, maintenance procedures, etc.)
3. The computer program which controls the scheduling of all periodic tests has been revised to include review of Station Directives at least once every two years. All Station Directives which have not been reviewed in the last two years (either by a formal review or by a substantial rewrite) will be reviewed and this review will be documented.
4. Mechanisms for assuring review of permanent station procedures had already been established prior to this inspection.
5. The station will be in full compliance by 10/1/81.

Violation 50-369/81-17-02, Severity Level V:

10 CFR 50, Appendix B Criterion V and the accepted QA Program, Section 17.2.5, require that activities affecting quality shall be prescribed by documented procedures and that these activities shall be accomplished in accordance with these procedures.

1. Station Directive 4.4.0, Processing Design Changes, Revision 11 dated December 13, 1971, requires that all temporary modifications (jumpers are considered temporary modifications) shall be documented on the work request (WR) and for temporary modifications remaining in place past a shift change, the temporary modification will be identified with a tag. A jumper was installed during performance of TP/1/A/2600/08, RTD Bypass Flow Verification on INC PG 5310, RTD Bypass Flow Loop A.

Contrary to the above, the jumper observed on June 3-4, 1981 installed on INC PG 5310 (RTD Bypass Flow Loop A) was not recorded on WR 83294, and was not tagged.

2. Station Directive 4.4.0, Processing Design Changes, Revision 11 dated December 13, 1980, requires for removal of temporary modifications, the individual documenting removal on the work request shall be personally responsible for documenting removal in the log.

Contrary to the above, temporary modification tags 0544, 0737, and 0938 associated with work requests 82799, 19339, and 101254, respectively, were completed but not removed from the log.

Response:

1. The jumper observed on June 3-4, 1981 installed on INCPG5310 (RTD Bypass Flow Loop A) was not recorded on WR 83294 and was not tagged. Temporary modification tags 0544, 0737, and 0938 associated with work requests 82799, 19339, and 101254, respectively, were completed but not removed from the log.
2. This violation was caused by personnel failing to follow the station directive on temporary modifications.
3. The jumper observed installed on INCPG5310 has been removed. The temporary modification logbook has been reviewed and all discrepancies corrected.
4. This area is being reviewed to determine what long-term actions may be required to prevent recurrence. Information concerning the above will be forwarded by September 30, 1981.
5. The station is presently in full compliance.

Violation 50-369/81-17-03, Severity Level V:

10 CFR 50, Appendix B Criterion V and the accepted QA Program, Section 17.2.5, required that activities affecting quality shall be prescribed by documented procedures and that these activities shall be accomplished in accordance with these procedures. The accepted QA Program Table 17.0.1 states that the licensee conforms to Regulatory Guide 1.39 (Revision 1) which endorses ANSI N45.2.3-1973. Station Directives 3.11.0, Housekeeping and Cleanliness, Revision 7 dated April 1981, implements the cleanliness

and housekeeping program and states, in part, the following zone designations of Level III and IV: smoking or use of tobacco products is not permitted; level cleanliness signs shall be posted; garbage, trash, scraps, litter and other excess materials shall be collected, removed from the job site or disposed of in designated areas following acceptance practices; and that for a Level III zone a log shall be maintained at the entrance of the area to log personnel and materials in and out of the area.

Contrary to the above, activities affecting quality were not accomplished in accordance with the approved procedure in that the following items were identified during the inspector's tour of various plant areas on June 10-11, 1981.

1. Various Level IV cabinets (Cabinets #2, #5, #7, Common HVAC panels) in the control room had cigarette butts, screws, wire scraps, tie wraps, plastic, and miscellaneous other pieces of material in the bottom of the cabinets.
2. In Cable Room 801 (Level IV) trash, wire brushes, cigarette butts, paper and extra cable were observed in several of the cable trays.
3. In the fuel pool area (Level IV) trash and cigarette butts were observed on the floor and loose material was being stored in the area. In addition, the pool was posted as a Level III area and a review of the log indicated that all material and personnel were not being logged in and out of the area.
4. Fire hoses designated 1RF168, 1RF167, 1RF176, and 1RF163 were not properly stored in their containers in various plant areas.
5. Work was being performed on Safety Injection Pump 1A and the pump and surrounding area had been designated as a Level III area. The area was not cleaned to level requirements prior to initiating work and the log did not contain an accounting of all material in the area designated; however, materials being used by the crafts performing the pump work was controlled properly.
6. Welding cables, temporary lines, and cables that had not been terminated were being supported by valves, valve handwheels and instrumentation in various plant areas.
7. Level III and IV areas are being posted, but certain areas did not meet the posting requirements specified in the Station Directive.

Response:

1. The items listed were in the stated condition on June 10-11, 1981.
2. This violation was caused by station personnel being unfamiliar with the constraints associated with working in housekeeping zones. Continued construction work in these areas also contributed to this violation.

3. Appropriate supervision have been counseled on the need for compliance to housekeeping requirements. Additionally, several tours of the facility were made by station management to heighten station personnel's awareness of cleanliness requirements and the need for enforcement.

The specific examples cited above have been corrected.

4. A mechanism has been established which will require a cleanliness inspection by station Quality Assurance prior to accepting turnover from construction. This should eliminate many of the cleanliness problems encountered on Unit 1.
5. The station is presently in full compliance.

Violation 50-369/81-17-04, Severity Level VI:

10 CFR 50, Appendix B Criterion V and the accepted QA Program, Section 17.1.5, requires that activities affecting quality shall be prescribed by documented procedures and that these activities shall be accomplished in accordance with these procedures. Station Directive 2.4.1, Control of Surface Applied Material Usage, Revision 1, dated August 1979, requires that a specific type of tape, Tuck 6224, be used on stainless steel to meet the sulphur and halogen requirements of ANSI N45.2.2.

Contrary to the above, three types of tape not authorized by Station Directive 2.4.1 were in use on quality identified stainless steel pipe located in warehouse 5 on June 5, 1981.

Response:

1. Three types of tape not authorized by Station Directive 2.4.1 were in use on quality identified stainless steel pipe located in warehouse 5 on June 5, 1981.
2. Responsible supervision were unaware that this requirement applied to safety related materials in storage.
3. Affected parts were removed and discarded. Approved tape was then applied to the pipe ends. Scotch #898 Filament tape was subsequently determined to meet ANSI N45.2.2 requirement and has been added to Station Directive 2.4.1.
4. A display board of approved tapes has been fabricated and attached to the storage racks. This board will be used for visual comparison to assure compliance with Station Directive 2.4.1.
5. The station is presently in full compliance.

Violation 50-369/81-17-05, Severity Level VI:

10 CFR 50, Appendix B Criterion V and the accepted QA Program, Section 17.2.5, requires that activities affecting quality shall be prescribed by documented procedures and that these activities shall be accomplished in accordance with these procedures. Administrative Policy Manual (APM) for nuclear stations, Section 2.2.3.5, Revision 18, dated September 1979, states in part that records shall be stored such that they are protected from possible destruction and that the storage facilities shall meet the NFPA 232-1975 criterion using as a minimum one hour fire rated cabinets. Section 2.2.3.6.1(b) of the APM states, in part, that qualifications and training records shall be retained.

Contrary to the above, records for certifying individuals to apply for an NRC Senior Operator license are being stored in a cabinet which does not meet the one hour fire rating requirement of NFPA 232-1975.

Response:

1. Records for certifying individuals to apply for an NRC Senior Operator license were being stored in a cabinet which does not meet the one hour fire rating requirement of NFPA 232-1975.
2. The subject records were not originally considered to be training records and, thus, were not stored in accordance with APM requirement for training records.
3. The records for certifying individuals to apply for an NRC Senior Operator license found stored at the Technical Training Center have been sent to the individuals' training files at the McGuire Nuclear Station where they are stored in accordance with APM Section 2.2.3.5.
4. A policy for retention of training records has been established within the Technical Training section which calls for transfer of all individuals' training records to the station within one week of an individual's assignment to a station. This policy will include operator requalification records which are generated by the Technical Training section.
5. The station is presently in full compliance.

Open Item 50-369/78-39-29:

Written requirements to use information available to detect chronic failures and other unsatisfactory trends in test equipment under the control of the McGuire Station. Procedures have not been developed to perform trend analysis for test equipment at this time. The expected program did not materialize due to the increase in the number of pieces of test equipment that are now required to operate the McGuire Station.

Response:

The Nuclear Maintenance Data Base Program was intended to provide trend analysis for all station test equipment. Due to program/equipment delays this data base has yet to be finalized.

A Maintenance Management Procedure will be written to address the identification and analysis of failures as they occur. This program will be implemented by January 1, 1982.