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DEC 0 1 1981

Duke Power Company
ATTN: Mr. W. O. Parker, Jr.
Vice President, Steam Production
P. O. Box 2178
Charlotte, NC 28242

Gentlemen:

Subject: Report Nos. 50-369/81-23 and 50-370/81-11

Thank you for your letter of November 20, 1981, informing us of steps you have taken to correct the violations concerning activities under NRC Operating License No. NPF-9 and Construction Permit No. CPPR-84 brought to your attention in our letter of October 23, 1981. We will examine your corrective actions and plans during subsequent inspections.

We appreciate your cooperation with us.

Sincerely,

Bryant

Paul J. Kellogg, Chief
Reactor Project Branch 2
Division of Resident and
Reactor Project Inspection

cc: M. S. McIntosh, Plant Manager
J. T. Moore, Project Manager

bcc:
NRC Resident Inspector
Document Management Branch
State of North Carolina

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DUKE POWER COMPANY
POWER BUILDING
422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28242

81 NOV 25 P12:25

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

November 20, 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 Nos. 50-369 and 50-370

Reference: RII:MJG
50-369/81-23
50-370/81-11

Dear Mr. O'Reilly:

Please find attached a response to violations 50-369/81-23-01, 02, 03, and 04 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.

PBN/smh

Attachment

McGUIRE NUCLEAR STATION

Response to I.E. Inspection Report 50-369/81-23 and 50-370/81-11

Violation 50-369/81-23-01, Severity Level V:

Technical Specification 6.8.1.a requires that the applicable procedures recommended in Appendix A of Regulatory Guide 1.33 (Rev. 2, Feb. 1978) shall be established, implemented and maintained. Station Directive 3.1.1, Reactor Operator's Logbook, was established to cover item 1.h in Appendix A of RG 1.33 and section 3.1.7 of the Administrative Policy Manual for Nuclear Stations. Station Directive 3.1.1 requires that all annunciator alarms pertaining to reactor core conditions and other important alarms (whether recorded by the computer or not) on Reactor Coolant System, Engineered Safeguards Systems, Reactor Protective System, etc., will be listed in the log with explanation.

Contrary to the above Technical Specification requirement, Station Directive 3.1.1 was not properly implemented or followed on June 2, 1981, when the Unit 1 control room annunciator alarm A-6 (Diesel Generator A panel trouble) occurred on panel 1 AD II, and was not listed in the RO log with explanation. On August 25, 1981, the alarm still had not been corrected and was not listed or explained in the logbook.

Response:

1. Duke Power Company agrees that the violation occurred as stated.

2. The alarm in question was not logged because the operator on duty at the time was aware that this was an invalid alarm and did not affect the operability of the Diesel Generator.

3. Repair work was completed on the subject alarm. The reflash capability of the alarm system was also repaired and is fully operational.

   The necessity of logging all important alarms was stressed in meetings with all shift personnel.

4. A concentrated effort is being made to clear all invalid alarms in the control room. This effort will be completed by January 1, 1982. In addition, Station Directive 3.1.1 (Reactor Operator Logbook) will be revised by December 1, 1981 to better define which alarms must be logged.

5. The station is presently in full compliance with the Technical Specification requirement in this area.

Violation 50-369/81-23-02, Severity Level V:

10 CFR 50 Appendix B 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. Station Directive 3.11.0, Housekeeping and Cleanliness, requires that in Level IV areas, smoking or use of tobacco products is not permitted and that trash shall be collected and removed.

Contrary to the above, on tours conducted on September 11-14, the inspector noted cigarette butts and paper in the pipe chase at column 45 BB of electrical penetration room 702, which is the lower personnel entrance to the containment; food wrappers and rags were in the cable trays of battery room 701; and cable spreading room 801 had a wooden bench, cleaning materials and rags in the cable trays.

Response:

1. Duke Power Company agrees that the violation occurred as stated.

2. Continued violation of Level IV cleanliness requirements by station and construction personnel caused this violation.

3. The entire Auxiliary Building has undergone extensive cleaning including cable trays, pipe trenches, etc. to correct this deficiency and to assure compliance with Level IV cleanliness requirements. Reinspections of these areas by site Quality Assurance have been acceptable.

4. Five additional K-Mac employees have been assigned to the Unit 1 Auxiliary Building. Periodic cleaning of cable trays has been instituted. Daily inspections by area K-Mac supervisors and weekly inspections by unit supervisors are being performed to insure continued compliance.

   Additionally, all station and construction personnel have been informed both verbally and in writing of cleanliness requirements. This communication also established a strict disciplinary policy which will be applied to any individual found violating cleanliness requirements.

5. The station is presently in full compliance.

Violation 50-369/81-23-03, Severity Level V:

Technical Specification 6.3 requires that each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions. Section 4.1 of ANSI N18.1-1971 requires the plant personnel to have a combination of education, experience and skills commensurate with their level of responsibility to provide reasonable assurance that decisions and actions during all normal and abnormal conditions will be such that the plant is operated in a safe and efficient manner.

Contrary to the above, on August 10, 1981, the electrical technicians, were unable to carry out their responsibility, in that they were unfamiliar with the system and thus unable to trip channel 1 of the Refueling Water Storage Tank level within specified time of the action statement. As a result, the operators had to commence unit shutdown in accordance with Technical Specifications.

Response:

1. Duke Power Company agrees that the violation occurred as stated.

2. This violation resulted from the fact that there were no written instructions on how to trip inoperable protection channels available to the electrical technicians on shift.

3. The subject channel was placed in the tripped condition approximately two hours after being declared inoperable and the unit shutdown was halted.

4. A procedure is being written which will provide directions for tripping inoperative protection channels. This procedure will be completed by December 1, 1981.

5. The station is presently in full compliance with Technical Specifications in this area due to the increased back-shift coverage by Instrumentation and Electrical (IAE) during power escalation. Full compliance will be maintained upon completion of the aforementioned procedure regardless of the extent of back-shift coverage.

Violation 50-369/81-23-04, Severity Level V:

Technical Specification 3.10.1 states that ". . . the shutdown margin requirement . . . may be suspended for measurement of control rod worth . . . ". Technical Specification 4.10.1.2 requires as associated surveillance, "each full length control rod not fully inserted shall be demonstrated capable of full insertion when tripped . . . within 24 hours prior to reducing the shutdown margin to less than the limits."

Contrary to the above, on August 17, 1981, while the shutdown margin requirement was suspended, control rod F-10 was not fully inserted and had not been demonstrated capable of full insertion within 24 hours.

Response:

1. Duke Power Company agrees that the violation occurred as stated.

2. Station Staff responsible for the zero power physics testing misunderstood tech. spec. surveillance requirement 4.10.1.2. They interpreted the spec. as a "prerequisite condition" to enter the condition. In fact this spec. was intended to be a prerequisite condition and "anticipatory surveillance requirement," ie; each rod which would eventually be withdrawn should be tested.

   Our procedures were written based on this misunderstanding. Review of these procedures by general office personnel, station personnel, Westinghouse personnel and NRC representatives did not uncover this flaw in the procedure.

   On August 17, 1981, an attempt was made to perform the Stuck Rod Test which requires going to an N-2 configuration. We did not trip test F-10 prior to withdrawing it. This test was aborted due to plant problems.

   Approximately 8 hours later a Westinghouse onsite physics testing representative pointed out our error. This conversation was overheard by the NRC acting resident. After checking with her management, she determined we were in violation.

   We then performed the Stuck Rod Test for the second time. A procedure change had been made on 8/17/81 to preclude a reoccurrence of this violation. The Test was completed satisfactorily.

3. The zero power physics testing controlling procedure has been revised to assure rod F-10 was dropped. Additionally, all shift test coordinators were advised of this situation.

4. Both the Unit 2 test procedures and the periodic test procedures will be written to assure compliance with Tech. Spec. 4.10.1.2.

5. The station is presently in full compliance with Technical Specifications in this area.