DUKE POWER COMPANY

GENERAL OFFICES

422 SOUTH CHURCH STREET

CHARLOTTE, N. C. 28242

August 3, 1982

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

Re: Oconee Nuclear Station Docket No. 50-269

Dear Mr. O'Reilly:

P. O. BOX 33189

Please find attached Reportable Occurrence Report RO-269/82-13. This report is submitted pursuant to Oconee Nuclear Station Technical Specification 6.6.2.1.a(2) which concerns an operation subject to a limiting condition for operation which was less conservative than the least conservative aspect of the limiting condition for operation established in the Technical Specifications, 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. W. O. Parker, Jr.'s letter of July 20, 1982 addressed the delay in preparation of this report.

Very truly yours,

H. B. Tucker, Vice President Nuclear Production Department

JFK/php Attachment

cc: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. W. T. Orders NRC Resident Inspector Oconee Nuclear Station

Records Center Institute of Nuclear Power Operations 1820 Water Place Atlanta, Georgia 30339

Mr. Philip C. Wagner Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D. C. 20555

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## DUKE POWER COMPANY OCONEE NUCLEAR STATION UNITS 1 AND 2

Report Number: RO-269/82-13

Report Date: August 3, 1982

Occurrence Date: July 6, 1982

Facility: Oconee Units 1 and 2, Seneca, South Carolina

Identification of Occurrence: Emergency Feedwater Pumps inoperable

Conditions Prior to Occurrence: Oconee 1 - 70% FP

Oconee 2 - Cold Shutdown

Description of Occurrence: On July 6, 1982, the Emergency Feedwater Pumps for Units 1 and 2 were declared inoperable when it was determined that the surveillance testing of the Emergency Feedwater Initiation Logic Pressure Switches had not been performed as required by the Technical Specifications. Subsequent review of the test records indicated that the Unit 1 pumps were not in compliance with the surveillance requirements from May 23, 1982 through July 6, 1982, and that the Unit 2 Turbine Driven Emergency Feedwater Pump was not in compliance with the surveillance requirements from May 24, 1982 through July 8, 1982. The Motor Driven Emergency Feedwater Pumps on Unit 2 had another surveillance test performed during this time period which fulfilled the requirements of the monthly surveillance test.

Apparent Cause of Occurrence: The apparent cause of this incident is personnel error, in that the review of the Technical Specification Change submittal was inadequate, since the errors were not identified prior to submitting the change request to the NRC. Additionally, the implementation review of the approved Technical Specification change did not correctly identify those procedures required to meet the amended Technical Specification requirements.

Analysis of Occurrence: The Emergency Feedwater Pumps were declared inoperable due to a missed surveillance. Subsequent testing confirmed the operability of the pumps; thus, the health and safety of the public were not affected by this incident.

Corrective Action: Unit 1 began power reduction in compliance with the Technical Specification. The required surveillance tests were completed on Unit 1 and the unit returned to power. The required surveillance tests were completed on Unit 2 prior to exceeding 250°F plant temperature. Future testing of these pressure switches will be performed in accordance with the current Technical Specifications. The personnel involved in the review of this submittal have been made aware of the deficiencies in their technical review and consequences of an improper review. Administrative changes are being implemented to improve the adequacy of Technical Reviews performed by station staff on Technical Specification revisions. The subject changes will provide specific criteria for review of the subject changes as well as more stringent administrative review prior to approval. These changes should be fully implemented by September 15, 1982.