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DUKE POWER

March 18, 1994

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

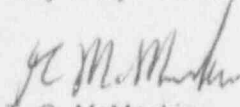
Subject: McGuire Nuclear Station, Units 1 and 2
Docket Nos. 50-369 and 50-370
NRC Inspection Report No. 50-369, 370/94-02
Violation 50-369, 370/94-02-04
Reply to a Notice of Violation

Gentlemen:

Enclosed is the response to the Notice of Violation issued February 16, 1994 concerning failure to maintain and implement packaging instructions in accordance with selected Certificate of Compliance (CoC) requirements.

Should there be any questions concerning this response, contact Randy Cross at (704) 875-4179.

Very Truly Yours,



T. C. McMeekin

Attachment

xc: (w/attachment)

Mr. S. D. Ebnetter
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta St., NW, Suite 2900
Atlanta, Georgia 30323

Mr. George Maxwell
Senior Resident Inspector
McGuire Nuclear Station

Mr. Victor Nerses
U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
One White Flint North, Mail Stop 9H3
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DEE

1. Reason for the violation:

The reason for the violation is inappropriate Action by the procedure preparer. The procedure preparer failed to incorporate Certificate of Compliance specified fastener torque values into station cask maintenance procedure MP/O/A/7550/11. Maintenance procedures for station equipment are generated from information obtained from vendor manuals, procedure formatting guidelines and maintenance experience. Experience with tightening of mechanical joints has shown that torque passes performed at 50%, 75% and 100% of vendor supplied fastener torque values ensures that the mechanical joint is tightened evenly and that fastener relaxation due to uneven tension is minimized. This approach was used in development of the Chem-Nuclear cask maintenance procedures. This resulted in the first torque value as specified in the Certificate of Compliance not being included in procedure MP/O/A/7550/11. The final torque value was incorporated into MP/O/A/7550/11 and was also used as the basis for calculating the 50% and 75% torque passes. A potential contributor to this error was the method of controlling vendor supplied revisions to these documents. Although vendor instructions identified in the Chem-Nuclear Certificate of Compliance were incorporated into station cask maintenance procedures with the exception of MP/O/A/7550/11 as stated above, the Certificate of Compliance was not treated as an equipment maintenance manual and was not included in the normal document control program.

2. Corrective steps that have been taken and the results achieved:

All Chem-Nuclear cask maintenance procedures (MP/O/A/7550/11, 13, 16, 18 and 20) were reviewed against the latest revision of the Chem-Nuclear Certificate of Compliance and no other discrepancies were identified. A procedure change to correct MP/O/A/7550/11 was initiated.

No similar problems with cask maintenance procedures have occurred since the procedure review was completed.

3. Corrective steps that will be taken to avoid further violations:

- a. Approve changes to maintenance procedure MP/O/A/7550/11.
- b. Process a minor modification to add the Chem-Nuclear Certificates of Compliance to the McGuire document control program.
- c. As part of planned corrective step B above, add a cover sheet to manuals stating that "Certificates of Compliance shall be incorporated into station procedures with all technical requirements intact. Any deviations from the Certificates of Compliance due to procedure formatting requirements or standardized maintenance practices is not allowed. Calibrated instruments (torque wrenches) which are required for completion of these procedures shall be calibrated such that the torque value tolerances specified in the Certificate of Compliance are met."

4. Date when full compliance will be achieved:

Full compliance will be achieved upon the completion of all corrective steps by June 1, 1994.