

DUKE POWER COMPANY

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October 15, 1982

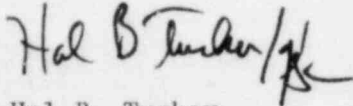
Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Re: Oconee Nuclear Station
Docket No. 50-269

Dear Mr. O'Reilly:

Please find attached Reportable Occurrence Report RO-269/82-15. This report is submitted pursuant to Oconee Nuclear Station Technical Specification 6.6.2.1.b(2) which concerns operation in a degraded mode permitted by a limiting condition for operation, 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.

Very truly yours,



Hal B. Tucker

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Attachment

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

INPO Records Center
Suite 1500
1100 Circle 75 Parkway
Atlanta, Georgia 30339

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

Mr. Philip C. Wagner
Office of Nuclear Reactor Regulation
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USNRC REGION II
ATLANTA, GEORGIA

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DUKE POWER COMPANY
OCONEE NUCLEAR STATION

Report Number: RO-269/82-15

Report Date: October 15, 1982

Occurrence Date: September 17, 1982

Facility: Oconee Unit 1, Seneca, South Carolina

Identification of Occurrence: The Unit 1 Reactor Protective System (RPS) manual reactor trip pushbutton was declared technically inoperable since it had not been tested in accordance with Technical Specification 4.1-1.

Conditions Prior to Occurrence: 100% FP

Description of Occurrence: On September 17, 1982, during a visit to Oconee Nuclear Station, representatives from INPO (Institute of Nuclear Power Operations) discovered that the Oconee procedure for the Reactor Trip Recovery did not include the required testing of the Reactor Protective System (RPS) manual reactor trip pushbutton. Per Technical Specification Table 4.1-1, Item 37, the manual reactor trip circuitry should be tested, prior to startup, if it has not been tested during the previous week.

Unit 1 had tripped and was started up on September 11, 1982 using the Reactor Trip Recovery Procedure. The RPS manual reactor trip pushbutton was not tested and had not been tested within the previous seven days. This violated Technical Specification 3.5.1.1; the pushbutton was then declared technically inoperable and a twelve hour time limit to hot shutdown was imposed per Technical Specification 3.5.1.2 at about 1500 on September 17, 1982.

Apparent Cause of Occurrence: The cause of the occurrence was a procedure deficiency in OP/1/A/1102/02 (Reactor Trip Recovery Procedure), in that it did not reflect the Technical Specification requirement for the testing of the RPS manual reactor trip pushbutton.

Analysis of Occurrence: The manual reactor trip is independent from the automatic portion of the RPS. The manual reactor trip is therefore not needed to assure protection against either fuel rod clad damage or over-pressurization of the RCS (Reactor Coolant System).

Manual reactor trip capability is desirable. If it had become necessary to trip the reactor and the manual reactor trip via the pushbutton in the control room had been inoperable, the reactor could be tripped as indicated below.

Turbine on-line - A manual turbine trip would have tripped the reactor in approximately 10 seconds on high RCS pressure prior to the installation of the anticipatory trip. After the installation of the anticipatory trip, a manual turbine trip would have tripped the reactor instantly.

Turbine off-line - The reactor could have been tripped in about one minute by opening the CRD (Control Rod Drive) breakers in the cable room.

It is concluded that the health and safety of the public were not compromised as a result of this incident.

Corrective Action: After the RPS manual reactor trip pushbutton was declared inoperable, a twelve hour time limit to hot shutdown was imposed. At 2158, the procedure for Verification of Manual Reactor Switch Operation was performed and completed while the unit was on-line. This test returned the operable status to the RPS manual reactor trip. To prevent recurrence, procedure changes were initiated to OP/1,2,3/A/1102/01 (Controlling Procedure for Unit Startup) and OP/1,2,3/A/1102/02 (Reactor Trip Recovery) in order to make the Oconee procedural surveillance requirements consistent with the Technical Specifications.

Prior to the INPO discovery of the deficiency in OP/1,2,3/A/1102/02 (Reactor Trip Recovery), operating practice at Oconee was to test manual reactor trip at a reactor coolant pressure of approximately 350 psig during heatups from cold conditions per OP/1,2,3/1102/01 (Controlling Procedure for Unit Startup).

Now, when a startup is controlled by the Controlling Procedure for Unit Startup, the Reactor Manual Trip Test will be done at a reactor coolant pressure of approximately 350 psig and again at hot shutdown just prior to criticality. If a startup is controlled by the Reactor Trip Recovery, the Reactor Manual Trip Test will be performed prior to going critical after a reactor trip.