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HAL B. TUCKER
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November 1, 1982

82 NOV 8 P 3:00

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-269/82-16. 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.

Very truly yours,

H. B. Tucker / BT

Hal B. Tucker

JCP/php
Attachment

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

INFO 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
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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DUKE POWER COMPANY
OCONEE NUCLEAR STATION

Report Number: RO-269/82-16

Report Date: November 1, 1982

Determination of Occurrence Date: October 18, 1982

Actual Occurrence Dates: January 29 - February 4, 1982

Facility: Oconee Unit 1, Seneca, South Carolina

Identification of Occurrence: Engineering Safeguard (E.S.) Surveillance tests were not conducted during January 1982 as required.

Conditions Prior to Occurrence: Highest Power Level 75% during time of inoperability

Description of Occurrence: On October 18, 1982, as a result of an internal Quality Assurance audit, it was determined that Unit 1 Engineering Safeguards (E.S.) Surveillance tests were not performed in January 1982 within the 45 day maximum allowable interval for monthly reports. Therefore, the systems that were to be tested were declared technically inoperable.

Engineering Safeguard (E.S.) Surveillance tests are required to be performed monthly per Technical Specification 3.5.1.1. They are to be performed every 30 days, but also given, if necessary, an additional 15 day grace period, thus totaling 45 days. If the unit is shutdown at the time required to conduct the E.S. Surveillance tests, they are to be taken at the next opportunity where allowable system conditions are present, prior to startup. Prior to this occurrence, the last E.S. Surveillance tests were performed November 23, 1981 - December 17, 1981. They were next scheduled to be performed January 5, 1982. (Forty-five days after the beginning of the previous surveillance date would have been January 8, 1982.) Because of a large work load, the tests were rescheduled for January 6, 1982. However, the reactor was shutdown that day and the E.S. Surveillance could not be taken. The reactor reached criticality on January 29, 1982. The tests should have been performed at this point; thus, the systems were then technically inoperable. February 4, 1982, the Engineering Safeguard Surveillance tests were conducted. Successfully completing these tests restored operability status to the systems involved.

Apparent Cause of Occurrence: The cause of this occurrence can be attributed to both personnel error and administrative deficiency. The personnel error was made when, after several schedulings and cancellations of the E.S. tests, the person responsible did not reschedule the tests after the last cancellation. This was complicated by the fact that the reactor was shutdown on the last scheduled day for testing. These tests are not required when the unit is shutdown. The administrative deficiency was found in the accepted practice method used. This practice caused the delayed surveillance to be overlooked. If this method was corrected, it would have allowed the E.S. Surveillance to have been performed in the required time limit.

Analysis of Occurrence: Although the systems on which the surveillance was missed were technically inoperable when the reactor reached criticality on January 29, 1982, the tests performed February 4, 1982 proved that the Engineering Safeguards System would have performed its function as designed. Thus, the health and safety of the public were not jeopardized.

Corrective Action: The accepted practice method will be modified to allow no misunderstanding of the completion of the required surveillances. Additionally, a mechanism will be established to notify Operations personnel that the testing is overdue and must be performed prior to startup. The person responsible has been counseled on the requirements of meeting dates of surveillance procedures.