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DUKE POWER

June 1, 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, 370/94-08
Violation 50-369, 370/94-08-01
Reply to a Notice of Violation

Gentlemen:

Enclosed is the response to the Notice of Violation issued May 6, 1994 concerning a non-conservative unidentified reactor coolant leakage calculation.

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

Mr. George Maxwell
NRC 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
Washington, D. C. 20555





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McGuire Nuclear Station
Reply to a Notice of Violation

Violation 369, 370/94-08-01

Technical Specification 3.4.6.2 requires that the unidentified leakage rate shall not exceed one gallon per minute while in Modes 1, 2, 3, and 4.

Contrary to the above, unidentified leakage rate exceeded the technical specification limit on at least twelve occasions during the past twelve months prior to December 7, 1993 while in Modes 1, 2, 3, and 4.

This is a Severity Level IV violation (Supplement I).

Reply to Violation 369, 370/94-08-01

1. Reason for the Violation:

The reason for the violation is failure to consider the system/component interaction in the original design of the program for the reactor coolant (NC) system leakage calculation. The calculation did not recognize inputs of water from other systems to the reactor coolant system drain tank (NCDT) and pressurizer relief tank (PRT).

Failure to recognize these potential inputs and the subsequent effect on the calculation logic could have caused the calculation to be non-conservative. Since plant personnel had not been aware of these potential inputs being accounted for as identified leakage, they were unaware of potentially exceeding the 1 gpm Technical Specification limit. Because they were unaware, no actions were taken to reduce the leakage or shutdown as required by the Technical Specification.

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

a. Systems Engineering personnel initiated PIP 0-M93-1253 to investigate the circumstances surrounding the problem and determine appropriate corrective actions.

b. Systems Engineering personnel initiated present and past operability evaluations with regard to compliance with Technical Specification 3.4.6.2.

c. Instrumentation and Electrical (IAE) personnel implemented Temporary Modifications 6314 and 6315 to eliminate inputs to the NCDT drain header which are not NC system related.

d. Systems Engineering personnel verified that potential for Cold Leg Accumulator drain and drain header inputs of refueling water storage tank (FWST) water to the NCDT were removed.

e. Operations personnel changed procedures PT/1 & 2/A/4150/01B, Reactor Coolant Leakage Calculation, to conservatively lock out the input from PRT level increases.

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

a. Mechanical Nuclear Engineering personnel will determine the best way to permanently remove non-NC system related inputs from the NC system leakage calculation. The evaluation for permanently removing inputs will be completed by July 5, 1994.

b. Modification Engineering personnel will include appropriate information to the Design Basis Document (DBD) for the NC system to address the NC system leakage calculation and the consequences of introducing inputs from other systems into the calculation. The NC System DBD will be completed by December 31, 1994.

4. Date when full compliance will be achieved:

Full compliance will be achieved by December 31, 1994.