## DUKE POWER COMPANY P.O. BOX 33189 CHARLOTTE, N.C. 28242

HAL B. TUCKER VICE PRESIDENT NUCLEAR PRODUCTION

August 26, 1983

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Mr. James P. O'Reilly, Regional Administrator U. S. Nuclear Regulatory Commission Region II 101 Marietta Street, NW, Suite 2900 Atlanta, Georgia 30303

Subject: McGuire Nuclear Station Docket Nos. 50-369 and 50-370

Reference: RII:WTO 50-369/83-27, 50-370/83-34

Dear Mr. O'Reilly:

Please find attached a response to Violation 50-369/83-27-01, 50-370/83-34-01 which was identified in IE Inspection Report 50-369/83-27, 50-370/83-34. Duke Power Company does not consider any information contained in this report to be proprietary.

Very truly yours,

H.B. Tuch / M

Hal B. Tucker

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Attachment

cc: Mr. W. T. Orders NRC Resident Inspector McGuire Nuclear Station

## Duke Power Company McGuire Nuclear Station Response to Violation 50-369/83-27-01, 50-370/83-34-01

## Violation 50-369/83-27-01, 50-370/83-34-01, Severity Level IV:

- A. Technical Specification 4.3.2.1, Table 4.3-2, Item 6 requires that the Containment Pressure Control System undergo a monthly analog channel operational test to verify the operability and setpoints of alarm, interlock and/or trip function.
- B. Technical Specification 3.3.2 requires that at least three channels per train of the Containment Pressure Control System be operable in modes 1, 2, 3 and 4 with their setpoints at < 0.25 psig.</p>
- C. Technical Specification 3.6.2 requires that two independent containment spray systems be operable in modes 1, 2, 3 and 4.
- D. Technical Specification 3.6.5.6 requires that two independent containment air return and hydrogen skimmer systems be operable in modes 1, 2, 3 and 4.

Contrary to the above,

- a) from March 3, 1983, to May 26, 1983, for Unit 2 and March 29, 1983 to May 26, 1983, for Unit 1, the Containment Pressure Control System did not undergo an appropriate monthly analog channel operational test to verify the operability of alarm, interlock and/or trip functions, such that on May 26, 1983, when the required surveillance was performed 6 of 8 CPCS modules on Unit 1 and 5 of 8 CPCS modules on Unit 2 were found with setpoints in excess of allowable limits.
- b) Three channels per train of the Containment Pressure Control System were not operable with their setpoints at < 0.25 psig for either unit, when the units were in modes 1, 2, 3, or 4 during the period of March 3, to May 26, 1983, for Unit 2 and March 29 to May 26, 1983, for Unit 1.
- c) Both containment spray systems were degraded for 39 days on Unit 2 when the unit was in modes 1, 2, 3 or 4 during the period of March 3, 1983, to May 26, 1983 in that both systems would have not been able to start and automatically deenergize within designed setpoints.
- d) Both containment air return and hydrogen skinner systems were degraded for 39 days on Unit 2 when the Unit was in modes 1, 2, 3, or 4 during the period of March 3, to May 26, 1983 in that both systems would have not functioned within required start and stop permissives.

## Response:

Duke Power Company agrees that an inadequate surveillance was performed on the Containment Pressure Control System at McGuire Nuclear Station as indicated in IE Inspection Report 50-369/83-27, 50-370/83-34. This situation was initially reported to the NRC as a licensee identified Reportable Occurrence Report RO-369/ 83-30 and RO-370/83-19. A change in monthly testing requirements in the newly issued combined Unit 1 and 2 Technical Specifications was not identified and incorporated into the monthly test procedure to check setpoint accuracy. Previously, the Unit 1 Technical Specifications required a trip setpoint calibration every 18 months and a monthly channel functional test which verified proper functioning of alarms and trip functions. The new Unit 1 and 2 Technical Specifications require a monthly analog channel operational test. This test requires injection of simulated signals to allow verification of alarm and trip setpoints and readjustment of setpoints not within limits.

Corrective steps were outlined in RO-369/83-30, RO-370/83-19 and included a review of the Unit 1 and 2 instrumentation surveillance procedures to ensure that they included setpoint verification, where required, and that the procedures met all other Technical Specification requirements. Also, the procedure associated with the Containment Pressure Control System has been revised to reflect the new requirements as outlined by Unit 1 and 2 Technical Specifications.

Administrative controls are being added to the McGuire Nuclear Station Directive to ensure that a more effective review of Technical Specification changes will be made and affected procedures revised in order to assure compliance with the Technical Specifications. McGuire Nuclear Station is presently in full compliance.