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HAL B. TUCKER VICE PRESIDENT NUCLEAR PRODUCTION

January 6, 1984

TELEPHONE (704) 373-4531

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

Subject: Oconee Nuclear Station IE Inspection Report 50-269/83-33 50-270/83-33 50-287/83-33

Dear Sir:

In response to your letter dated December 8, 1983 which transmitted the subject Inspection Report, the attached response to the cited item of non-compliance is provided.

I declare under penalty of perjury that the statements set forth herein are true and correct to the best of my knowledge on January 6, 1984.

Very truly yours,

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Hal B. Tucker

PFG:dyh

Attachment

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Violation

Technical Specification 3.7.4(c) requires that the operable Keowee hydro unit be available to the overhead transmission circuit if one of the Keowee hydro units is unavailable for maintenance longer than 72 hours.

Technical Specification 3.7.9 requires that any degradation beyond Technical Specification 3.7.4 be subject to a safety evaluation of the specific situation justifying the safest course of action.

Contrary to the above, with Keowee hydro unit 1 unavailable for maintenance longer than 72 hours, degradation beyond Technical Specification 3.7.4(c) was not subject to the licensee's November 1, 1983 safety evaluation of the specific situation, in that the associated loss of the overhead transmission circuit due to a lockout of startup transformer, CT-3 on October 15, 1983 was not addressed.

This is a Severity Level V Violation (Supplement I).

Response

1) Admission or denial of the alleged violation:

This violation is correct.

2) Reasons for the violation:

This violation resulted from personnel error. The personnel evaluating the lockout of CT-3 realized that this made the overhead transmission path from Keowee inoperable, but did not specifically address that event as a degradation beyond Tech. Spec. 3.7.4 in the evaluation performed subject to the requirements of Technical Specification 3.7.9. Instead, they specifically addressed the subsequent de-energizing of the Standby Bus from Lee Station in order to fully test the underground power path from Keowee; this was a degradation beyond Technical Specification 3.7.4(a) also subject to the requirements of Technical Specification 3.7.9. Thus, while the lockout of CT-3 was the initiating event and was considered in the overall evaluation, it was not specifically the subject of a separate evaluation.

3) Corrective actions taken and results:

A revised special report dated December 2, 1984 describing the actions and evaluations performed as a result of this event was submitted to NRC/OIE.

Personnel involved are aware of their error in this event. The station program for identification and evaluation of non-routine events has been revised to require better prompt evaluation of non-routine events and assurance that all applicable Technical Specification requirements are met.

4) Corrective actions to be taken to avoid further violations:

All corrective actions are complete. See (3) above.

5) Date when full compliance will be achieved:

All corrective actions are complete. See (3) above.