

Duke Power Company
McGuire Nuclear Generation Department
12700 Hagers Ferry Road (MG01A)
Huntersville, NC 28078-8983

T. C. McMEEKIN
Vice President
(704)875-4800
(704)875-4809 FAX



DUKE POWER

August 7, 1992

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: McGuire Nuclear Station
Docket Nos. 50-369, -370
Inspection Report No. 50-369, -370/92-15

Gentlemen:

Pursuant to 10CFR 2.201, please find attached Duke Power Company's response to the Violation 369, 370/92-15-01 and Violation 369, 370/92-15-03 given in Inspection Report 50-369, 370/92-15 for McGuire Nuclear Station.

Should there be any questions concerning this matter, contact Larry Kunka at (704)875-4032.

Very truly yours,

T. C. McMeekin
McGuire Nuclear Site Vice President

Attachment

xc: (w/attachment)

Mr. S. D. Ebneter
Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta St., NW, Suite 2900
Atlanta, GA 30323

Mr. P. K. Van Doorn
NRC Resident Inspector
McGuire Nuclear Station

Mr. Tim Reed
U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, D.C. 20555

JED

bxc: (w/Attachment)

A.V. Carr - PB05E

NSRB Personnel

R.C. Futrell (CNS)

R.L. Gill

P.R. Herran

M.E. Patrick (ONS)

R.O. Sharpe

D.R. Bradshaw

M.A. Mullen

T.L. Pedersen

T.S. Barr

QA Tech. Services NRC Coordinator (EC12A)

M.F. 1.2.1

File 815.01

McGUIRE NUCLEAR STATION
RESPONSE TO NOTICE OF VIOLATION

Violation 369, 370/92-15-01

Technical Specification 6.2.2.b requires at least one licensed operator for each unit to be in the control room when fuel is in either reactor. In addition, while either unit is in Mode 1, 2, 3 or 4, at least one licensed Senior Operator shall be in the control room.

Contrary to the above, on May 17, 1992, with Unit 2 in Mode 1, a period of time (approximately two minutes) existed when there was no licensed Senior Operator in the control room.

This is a Severity Level IV violation (Supplement 1).

Response to Violation 369, 370/92-15-01

1. Reason for violation

On May 17, 1992, the assigned Control Room Senior Reactor Operator (SRO) turned over Control Room responsibilities verbally to another SRO on his shift because he was leaving the Control Room for a short break. At the time of the verbal turnover, the relieving SRO was busy reviewing a plant drawing for a system tagout. While the turnover was taking place, he was heard by a Control Room Operator acknowledging the turnover; however, he does not remember having done so and therefore did not realize he was the designated SRO.

At 12:38 P.M., the relieving SRO left the Control Room looking for some plant drawings. At 12:40 P.M., the relieving SRO entered the Operations break area (adjacent to the Control Room) and observed the other two shift SRO's. The relieving SRO then realized that there was no SRO in the Control Room, and immediately returned to the Control Room. The time that a Control Room SRO was not present in the Control Room was approximately two minutes.

2. Corrective actions taken and results achieved

1. Upon realizing there was no SRO in the Control Room, the relieving SRO immediately returned to the Control Room which returned McGuire to compliance with Technical Specifications.
2. The short term Control Room SRO relief process has been changed. When the Control Room SRO is relieved, a formal turnover occurs and a sign off on that document reflects who is the relief Control Room SRO.

3. As part of the relief process, the designated Control Room SRO shall place a plastic sleeve over his security badge to act as a barrier to prevent the Control Room SRO from exiting the Control Room without first removing the sleeve. This barrier should prevent a designated Control Room SRO from inadvertently exiting the Control Room without consciously removing the sleeve and thus remind him of his responsibilities.

3. Corrective actions to be taken to avoid further violations

No further actions are required

4. Date when full compliance will be achieved

McGuire Nuclear Station is in full compliance at this time

Violation 369,370/92-15-03

Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, which includes maintenance activities.

Contrary to the above, on June 11, 1992, licensee procedure MP/0/A/7650/97, Steam Generator Primary Manway Removal and Replacement Using a Multi-Stud Tensioner, was inadequate in that it did not contain sufficient controls to assure that a reactor coolant vent path was maintained during Mid-loop operations. This resulted in a loss of the vent path for approximately 10 hours.

Response to Violation 369, 370/92-15-03

1. Reason for the violation

Prior to the start of the May 1992 Unit 1 steam generator (SG) tube inspection outage, McGuire management personnel made a decision to establish a vent path through the hot leg of SG 1B to avoid having to remove the reactor vessel head during the outage. Discussion of the consequences of this decision was held between Work Control, Operations and Component Engineering personnel. However, even though the vent path was discussed prior to the start of the outage and current vent path status covered during daily outage and SG status meetings, no changes were made to the existing administrative and procedural controls to ensure this new vent path configuration would be properly maintained.

On June 10, 1992, with Unit 1 in midloop operation, the Component Engineer (CE) in charge of the SG work made a work list for the crews coming in that night. Included in the list were directions to close the Cold Leg Manway on SG 1B. The CE stated that the list was extensive and that he did not expect the crews to complete all of the items listed that night. No mention was made of the vent path through SG 1B on the list. During turnover, no mention was made of the vent path.

There was no further interface between the CE and the SG crews that night. Contrary to the expectations of the CE, all items on the work list were completed that night including replacement of the manway cover for SG 1B. The Maintenance Support Technician stated that he was aware of the vent path being through SG 1B, but concluded that the CE must have made arrangements with Operations personnel for the vent path to be changed from SG 1B. This same conclusion was voiced by the Maintenance personnel who performed the SG manway installation. All work involving installation of the SG manway cover was performed according to written direction of the CE and approved station procedures.

At approximately 0100 June 11, 1992, Maintenance personnel installed the diaphragm for the manway on SG 1B. This effectively blocked the reactor coolant system vent path. At approximately

0530 the CE arrived on site. Upon arrival, he discovered the vent path had been closed and verified the manway had been installed. Immediate action was then taken to begin removal of the Hot Leg nozzle dam on SG 1A and thereby reestablish the vent path. The vent path was reestablished at approximately 1100 on June 11, 1992.

Actions taken and results achieved

1. The nozzle dam was removed from SG 1A to establish a vent path.
2. Component Engineering personnel incorporated procedural sign offs for control room SRO concurrence whenever the vent path is changed in procedures governing SG manway removal and installation as well as procedures governing removal and installation of nozzle dams.
3. Component Engineering personnel established a written turnover sheet to document the existing vent path to keep SG crew personnel informed of the vent path status.
4. Operations personnel verified adequate turnover of the vent path status was being performed by Operations shift personnel.

Actions to be taken to avoid further violations

1. Operations personnel will evaluate the use of a graphic representative in the Control Room to display current vent path status as an aid to Control Room personnel.
2. A Selected Licensee Commitment will be incorporated into the McGuire SLC manual dealing with operation at reduced inventory.
3. Component Engineering personnel will change all procedures governing reactor vessel head removal and replacement, SG primary manway removal and replacement and SG nozzle dam installation and removal to incorporate a reference to the SLC on reduced inventory.
4. The McGuire Human Performance Enhancement Systems Coordinator in conjunction with McGuire management personnel will evaluate the use of Human Factors training for McGuire staff personnel to aid in the decision making process used during development of policies and procedures used at McGuire involving safe operating practices.
5. A Procedure Steering Committee will be formed consisting of representatives from each section that uses procedures to investigate and propose solutions to procedure problems encountered at McGuire. Additionally, this committee will receive recommendations from the Procedure

Adherence Committee to be considered in the procedure improvement process.

6. Each section that uses procedures will perform a review of all problems associated with procedures. As a part of this review, sections will develop plans to correct procedure related problems including timetables for corrections and determine the resources necessary to correct the problems.

4. Date when full compliance will be achieved

McGuire will complete all the above actions and be in full compliance prior to the start of the next Unit 1 refueling outage scheduled for March 1993.