

**DUKE POWER COMPANY**

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63 NOV 29 1983  
November 18, 1983

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

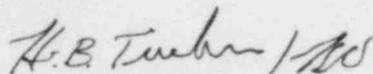
Subject: McGuire Nuclear Station  
Docket Nos. 50-369 and 50-370

Reference: RII:W0  
50-369/83-33, 50-370/83-40

Dear Mr. O'Reilly:

Please find attached responses to Violations 50-369/83-33-01 and 50-370/83-40-01 which were identified in IE Inspection Report 50-369/83-33, 50-370/83-40. Duke Power Company does not consider any information contained in this report to be proprietary.

Very truly yours,



Hal B. Tucker

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Attachment

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

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Duke Power Company  
McGuire Nuclear Station  
Response to Violations 50-369/83-33-01 and 50-370/83-40-01

Violation 50-369/83-33-01, Severity Level IV:

Technical Specification 6.8.1 requires that written approved procedures be implemented to control surveillance testing.

Contrary to the above, on August 9, 1983, at 11:57 a.m. during the performance of a Power Operated Relief Valve Channel Functional Test, an electronics technician failed to abide by the requirements of the procedure, PT-1-A-4150-14, when he inappropriately placed a jumper which resulted in the loss of feedwater to steam generator B.

Response:

Duke Power Company agrees that a McGuire Nuclear Station electronics technician failed to follow the requirements of the procedure for performance of the Power Operated Relief Valve Channel Functional Test. The technician placed a jumper on an incorrect card in a cabinet which resulted in a loss of feedwater to Unit 1 Steam Generator B. This violation is attributed to personnel error. The technician involved in this violation was personally counseled by his supervisor in the proper use of procedures and the consequences of deviating from procedures.

Due to personnel error being the cause of recent violations, upper management held meetings on October 11 and 13 with all McGuire Nuclear Station personnel on using and following procedures, correcting inadequacies in procedures and correctly signing off procedure steps. McGuire Nuclear Station is presently in full compliance with the Technical Specifications.

Violation 50-370/83-40-01, Severity Level IV:

Technical Specification 3.1.1.3.a requires that the moderator temperature coefficient (MTC) be less positive than 0 delta K/K/°F for the all rods out, at the beginning of cycle life, and hot zero thermal power condition. With an MTC more positive than above, the control rods must be maintained within withdrawal limits established sufficient to maintain the MTC to less positive than 0 delta K/K/°F.

Contrary to the above, on August 9, 1983, at 4:32 a.m., Unit 2 was taken critical with an unacceptable control rod position. The operator failed to follow controlling procedure for unit startup, OP/2/A/6100/01, and make use of the Data Book which resulted in a violation of withdrawal limits established to prevent a positive moderator temperature coefficient. Based on conservatism used in developing rod withdrawal limits, the actual MTC was slightly negative.

Response:

Duke Power Company agrees that McGuire Nuclear Station operators failed to follow a controlling procedure and use the Data Book for unit startup which resulted in Unit 2 being taken critical with control rod positions exceeding established limits. However, Duke Power believes that the criteria in 10 CFR, Part 2, Appendix C, Section IV, for a notice of violation not being issued, were satisfied such that NRC issuance of a notice of violation was not appropriate. These criteria are as follow:

- 1) The violation was identified by the licensee;
- 2) The violation fits in Severity Level IV or V;
- 3) The violation was reported, if required;
- 4) The violation was or will be corrected, including measures to prevent recurrence, within a reasonable time; and
- 5) It was not a violation that could reasonably be expected to have been prevented by corrective actions for a previous violation.

Control rod withdrawal exceeding the limits of the startup procedure during Unit 2 startup was identified by Duke Power and reported as a Reportable Occurrence Report RO-370/83-39 on September 7, 1983. This Severity Level IV Violation was not a violation that could have been prevented by corrective actions for a previous violation because there have been no previous violations related to control rod limit violations. Corrective measures were implemented and completed within a reasonable time to prevent this incident from occurring in the future.

A McGuire Nuclear Station control operator calculated the estimated critical rod position (ECP) for unit startup but failed to consult the Data Book curve for control rod position versus boron concentration to verify that the rod position was within the established limits. The resulting critical rod position was above the established rod withdrawal limits; however, the calculated moderator temperature coefficient remained less than zero during the startup due to margin in the rod withdrawal limits.

As described in RO-370/83-39, a sign-off step was added to the Reactivity Balance Calculation procedure to ensure that the moderator temperature coefficient rod withdrawal limits are consulted. Further details concerning this violation are given in the referenced reportable occurrence report. McGuire Nuclear Station is presently in full compliance with the Technical Specifications.