#### ENCLOSURE 1

#### NOTICE OF VIOLATION

Duke Power Company McGuire Units 1 and 2 Docket Nos. 50-369, 50-370 License Nos. NPF-9, NPF-17

During an NRC inspection conducted on April 19, 1992 - May 16, 1992, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

10 CFR 50 Appendix B Criterion III and the licensee's accepted Quality Assurance Program (Duke Power Company Topical Report Quality Assurance Program, DUKE-1-A) require that measures be established to assure that applicable regulatory requirements and the design basis for structures, systems, and components are correctly translated into specifications, drawings, procedures, and instructions.

Contrary to the above, measures were not effective to assure that applicable regulatory requirements and the design basis for structures, systems, and components were correctly translated into specifications, drawings, procedures, and instructions. This is evidenced by the fact that on March 27, 1992, air was discovered in the Nuclear Service Water System and the design control process failed to recognize this possibility. This directly impacted the ability of the Auxiliary Feedwater System to perform its intended safety function.

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

Pursuant to the provisions of 10 CFR 2.201, Duke Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector McGuire Nuclear Plant, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not

Duke Power Company 2 Docket Nos. 50-369, 50-370 McGuire Units 1 and 2 License Nos.

received within the time specified in this Notice, an order or demand for information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Atlanta, Georgia this 12 day of June 1992

#### ENCLOSURE 2

#### LIST OF ATTENDEES

#### U. S. Nuclear Regulatory Commission

- J. Johnson, Deputy Director, Division of Reactor Projects (DRP), Region II (RII)
- E. Merschoff, Deputy Director, Division of Reactor Safety (DRS), RII
- A. Herdt, Chief, Reactor Projects Branch 3, DRP, RII
- A. Belisle, Chief, Reactor Projects Section 3A, DRP, RII
- P. VanDorn, Senior Resident Inspector, McGuire Facility, RII
- T. Reed, Senior Project Manager, Project Directorate II-3, Office of Nuclear Reactor Regulation
- G. Jenkins, Director, Enforcement and Investigation Coord\_nation Staff (EICS), RII
- B. Uryc, Senior Enforcement Specialist, BICS, RII
- \*J. Luehman, Enforcement Specialist, Office of Enforcement
- \*Attended by teleconference

#### Duke Power Company

- T. McMeekin, Vice President, McGuire Nuclear Station (MNS)
- P. Herran, Engineering Manager, MNS
- T. Curtis, System Engineering Manager, MNS
- R. Hall, Mechanical/Nuclear Engineering Manager, MNS
- D. Baxter, Operations Support Manager, MNS
- G. Gilbert, Safety Assurance Manager, MNS
- R. Spittle, Auxiliary Feedwater System Engineer

### DUKE POWER COMPANY McGUIRE NUCLEAR STATION

# NUCLEAR SERVICE WATER/AUXILIARY FEEDWATER AIR ENTRAINMENT ENFORCEMENT CONFERENCE

JUNE 8, 1992

#### AGENDA

OPENING REMARKS Ted McMeekin

DESIGN BASIS Pete Herran

SYSTEM DESCRIPTION Pete Herran

PROBLEM DESCRIPTION Pete Herran

SEQUENCE OF EVENTS Pete Herran

ROOT CAUSE Pete Herran

CORRECTIVE ACTION Pete Herran

SAFETY SIGNIFICANCE Pete Herran

CLOSING REMARKS Tea McMeekin

## AUXILIARY FEEDWATER SYSTEM DESIGN BASIS

- \* ENSURE ADEQUATE HEAT TRANSFER FROM THE REACTOR COOLANT TO THE STEAM GENERATORS IF THE CONDENSATE/ FEEDWATER SYSTEM IS NOT AVAILABLE
- \* MAINTAIN WATER LEVELS ABOVE THE STEAM GENERATOR TUBES TO LIMIT PRIMARY TO SECONDARY FISSION PRODUCT LEAKAGE
- \* TWO MOTOR DRIVEN PUMPS (MDP)
  OR
  TURBINE DRIVEN PUMP (TDP)

REQUIRED TO MEET AUXILIARY FEEDWATER SYSTEM (CA) FLOW REQUIREMENTS.

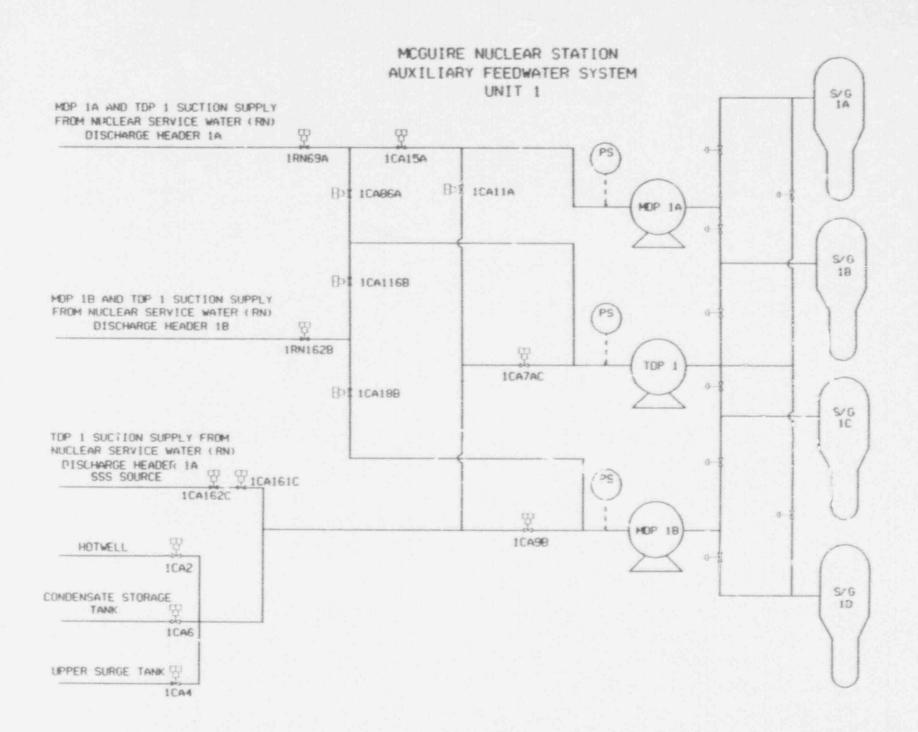
## AUXILIARY FEEDWATER SYSTEM DESCRIPTION

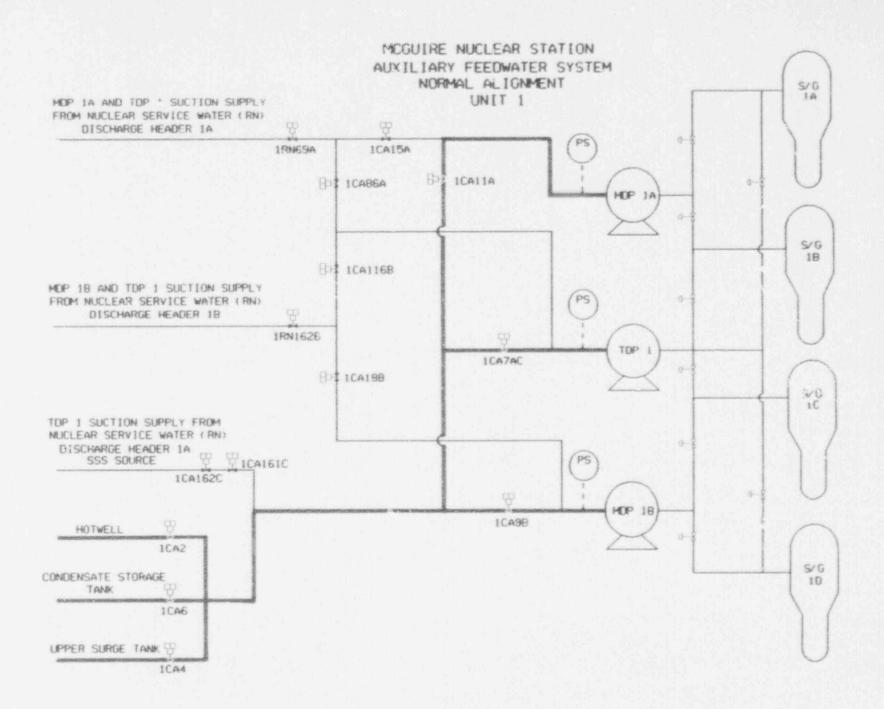
#### COMPONENT DETAILS

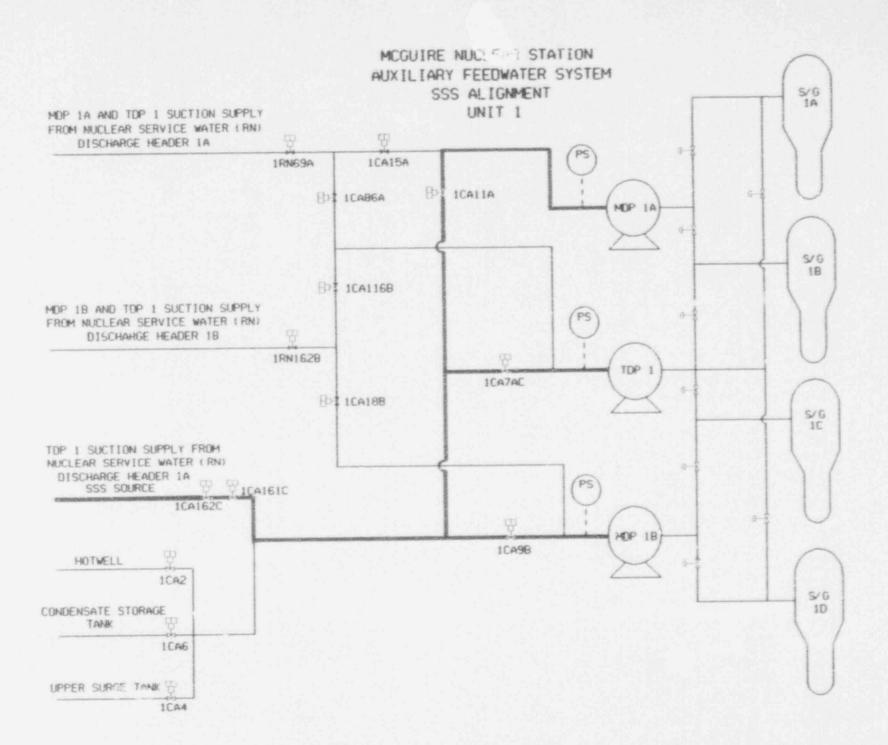
- PUMPS ARE MULTISTAGE, HIGH HEAD, AND HAVE CLOSE CLEARANCES
- VALVES PROVIDE THE REALIGNMENT REQUIRED TO TRANSFER TO THE SAFETY GRADE ASSURED SUPPLY OF FEEDWATER
- FEEDWATER WATER SUPPLIES AND INITIATE PUMP
  SUCTION VALVE REALIGNMENT

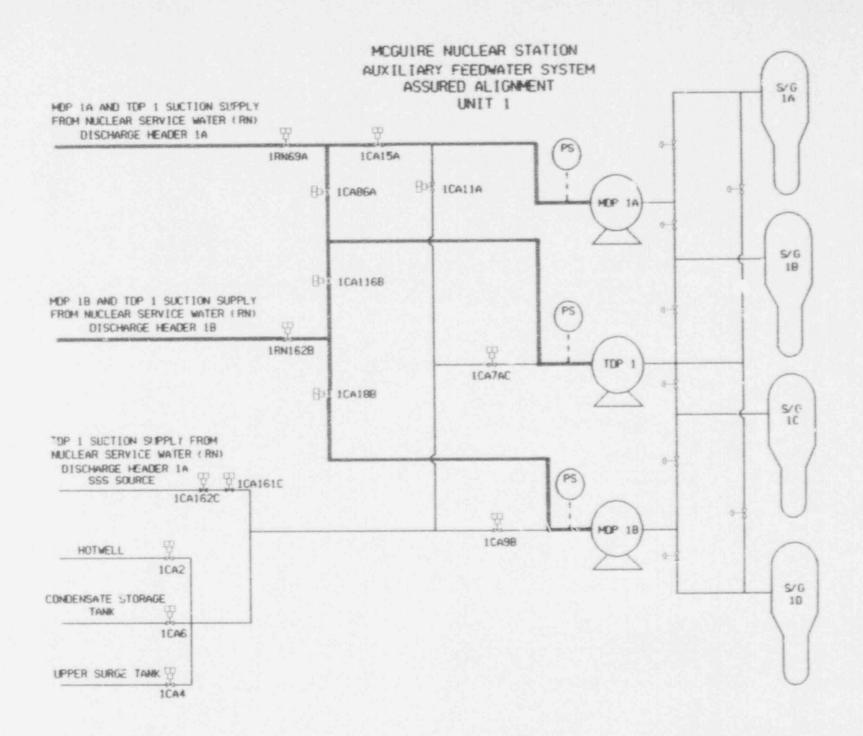
#### FEEDWATER SUPPLIES

- AUXILIARY FEEDWATER SYSTEM IS REQUIRED ONLY WHEN THE CONDENSATE/FEEDWATER SYSTEM IS NOT AVAILABLE
- CONDENSATE IS THE NORMAL AUXILIARY FEEDWATER SUPPLY AND IS NON-SAFETY
- ALIGNMENT TO SAFETY GRADE ASSURED SUPPLY ONLY OCCURS WHEN NORMAL SUPPLY IS DEPLETED
- NUCLEAR SERVICE WATER (RN) IS THE SAFETY GRADE ASSURED SUPPLY
- SWAPOVER FEATURE SENSES LOSS OF NORMAL CONDENSATE SUPPLY AND PROVIDES REALIGNMENT TO NUCLEAR SERVICE WATER (RN) SUPPLY









#### PROBLEM DESCRIPTION

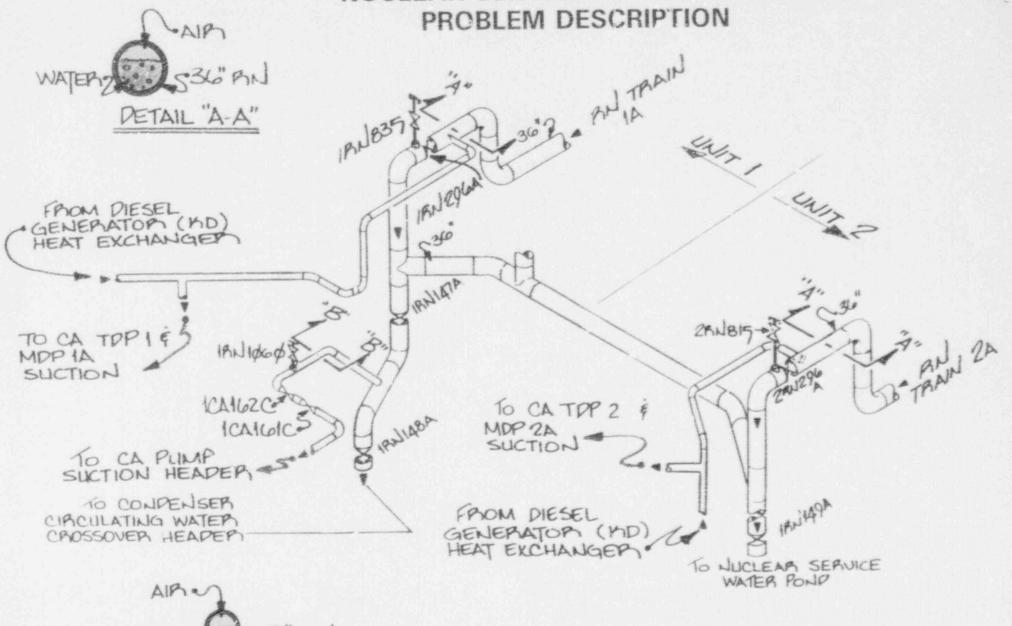
#### PROBLEMS

- DISCOVERY OF AIR IN SAFE SHUTDOWN SYSTEM (SSS) WATER SUPPLY TO UNIT 1 AUXILIARY FEEDWATER (CA) PUMPS
- 2. AIR FOUND IN NUCLEAR SERVICE WATER (RN) TRAIN
  1A AND 2A SUPPLY TO AUXILIARY FEEDWATER (CA)
  PUMPS

#### **EFFECTS**

- CA PUMP OPERABILITY FROM NORMAL CONDENSATE SUPPLY UNAFFECTED
- CA PUMP OPERABILITY POTENTIALLY AFFECTED FOLLOWING TRANSFER FROM NORMAL SUPPLY
  - AIR IN UNIT 1 SSS SUPPLY POTENTIALLY
    AFFECTED CA TDP 1 AND MDP 1A AND 1B
  - AIR IN UNIT 1 AND 2 NUCLEAR SERVICE WATER
    (RN) "A" TRAIN SUPPLIES POTENTIALLY
    AFFECTED UNIT 1 AND 2 TDP AND MDP A
- FOR CA PUMP DEGRADATION AS A RESULT OF AIR ENTRAINMENT FROM SSS AND RN SUPPLY FLOWPATHS
- CA PUMPS CONSERVATIVELY DECLARED INOPERABLE

# MCGUIRE NUCLEAR STATION NUCLEAR SERVICE WATER SYSTEM PROBLEM DESCRIPTION



PETAIL "B-B"

#### SEQUENCE OF EVENTS

### 3/27-4/3 DISCOVERY OF AIR IN NUCLEAR SERVICE WATER SYSTEM

- ENGINEER DISCOVERS AIR IN UNIT 1 SSS SUPPLY
  ASSURED FEEDWATER SUPPLY
- DISCOVERED DURING INSPECTION OF "STAGNANT OR INFREQUENTLY USED FLOW PATHS" PER GENERIC LETTER 89-13
- LINE VENTED AS IMMEDIATE CORRECTIVE ACTION
- RE-VENTING REVEALS ADDITIONAL AIR
- INFORMAL SEARCH FOR SUPPLY OF AIR BEGUN
- OPERATIONS PREPARES VENTING PROCEDURE (TRAPPED AIR THOUGHT TO BE THE PROBLEM)

#### 4/7-4/9 REALIZATION OF SSS SUPPLY OPERABILITY ISSUE

- REVIEW OF VENTING PROCEDURE REVEALS
  OPERABILITY CONCERN FOR SSS SUPPLY TO
  TURBINE DRIVEN AUXILIARY FEEDWATER PUMP
- FORMAL OPERABILITY EVALUATION INITIATED
- PERIODIC VENTING ESTABLISHED AS IMMEDIATE CORRECTIVE ACTION
- OPERABILITY EVALUATION EXPANDS TO OPERABILITY OF AUXILIARY FEEDWATER SYSTEM PROPER
- SSS-SUPPLY ISOLATED AS A PRECAUTION
- SSS DECLARED INOPERABLE

#### SEQUENCE OF EVENTS (CONT'D)

# 4/8-4/30 SIMULTANEOUS INVESTIGATIONS OF PROBLEM 1 SYSTEMATIC SEARCH FOR AIR & AIR SUPPLY(S)

- PIPING LAYOUT AND EQUIPMENT REVIEW
- WALKDOWN; SEARCH FOR IN-LEAKAGE; ADDITIONAL VENTING
- EVALUATION OF DISSOLVED AIR RELEASE
- CONCLUSIONS:

AIR @ HIGH POINTS ON DIECHARGE SIDE

NO IN-LEAKAGE

DISSOLVED AIR RELEASE IS SOURCE OF AIR

### INVESTIGATION OF SSS SUPPLY EFFECT UPON PAST OPERABILITY OF AUXILIARY FEEDWATER SYSTEM

- HYDRAULIC MODELING OF FLOW PATHS,
  ASSESSMENT OF POTENTIAL FOR AIR ENTRAINMENT
  AND TRANSPORT
- EVALUATION OF CA PUMP REQUIREMENTS; PUMP MANUFACTURER/DESIGNER REVIEWS
- REVIEW OF INDUSTRY EXPENSENCE/LITERATURE
- CONCLUSION:

COMPLEXITIES PREVENT CONCLUSIVE DEMONSTRATION OF PAST OPERABILITY; CA TDP 1A AND MDP 1A AND 1B CONSERVATIVELY DECLARED TO HAVE BEEN INOPERABLE SEQUENCE OF EVENTS (CONT'D)

### 4/30-5/5 REALIZATION OF SIGNIFICANCE OF AIR/SINGLE FAILURE INTERACTIONS - PROBLEM 2

- VULNERABILITY OF BOTH UNITS' CA TOP & MOP A
  TO SINGLE FAILURE IN NUCLEAR SERVICE WATER
  SYSTEM
  - FEEDWATER + LOSS OF CONDENSATE/
    FEEDWATER + LOSS NORMAL AUXILIARY
    FEEDWATER SUPPLY + LOSS D/G COOLING
    FLOW "A"
  - INCREASED PERIODIC VENTING BEGUN AS IMMEDIATE CORRECTIVE ACTION
  - ADDITIONAL INVESTIGATION, TESTING, AND FORMAL OPERABILITY EVALUATION BEGUN
- FROM "A" SERVICE WATER LINE AND DECLARED INOPERABLE
  - 72 HOUR LCO ENTERED
  - TD PUMP REMAINS AVAILABLE
  - ACTION PREVENTS SIMULTANEOUS
    INOPERABILITY OF TD PUMP AND "A" MD PUMP
- CONTINUOUS VENTING AND PROCEDURE CHANGES
  IMPLEMENTED
  - TD PUMP RESTORED TO OPERABILITY
  - 72 HOUR LCO EXITED

#### SEQUENCE OF EVENTS (CONT'D)

5/4	UNIT	1	SHUTDOWN	FOR	S/G	OUTAGE	
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5/20 UNIT 2 TRIPPED; ENTERED PLANNED S/G OUTAGE

#### ROOT CAUSE

ROOT CAUSE:

DESIGN DEFICIENCY -SYSTEM CONFIGURATION AND FUNCTIONAL DESIGN DEFICIENCY

EFFECT OF AIR COMING
FROM SOLUTION NOT
CONSIDERED IN DESIGNING
ASSURED MAKEUP SUCTION
TIE-INS

#### CORRECTIVE ACTION

#### INITIAL CORRECTIVE ACTIONS

- VENTING AT AFFECTED LOCATIONS
- CONSERVATIVE MEASURE TO CLOSE 1CA161C TO ASSURE UNIT 1 AUXILIARY FEEDWATER OPERABILITY
- TEMPORARY ISOLATION OF "A"
  SERVICE WATER SUPPLY TO UNIT 1 & 2
  TD AUXILIARY FEEDWATER PUMPS

#### SUBSEQUENT ACTIONS

- INSTALLED CONTINUOUS VENTING
  SYSTEM AT 1RN835 AND 2RN815 FOR
  AUXILIARY FEEDWATER OPERABILITY
- PROCEDURE CHANGES TO ASSURE RN SUPPLY DURING REALIGNMENT TO NUCLEAR SERVICE WATER POND

### CORRECTIVE ACTION (CONT'D)

#### PARALLEL ACTIONS (COMPLETE)

- EXTENSIVE ENGINEERING EVALUATION
- VERIFICATION OF NO ADDITIONAL AFFECTS OF AIR IN NUCLEAR SERVICE WATER (RN)
- COMPLETION OF VENTING REVIEW FOR CA & ECCS PUMPS
- VERIFICATION OF NO SIMILAR PROBLEMS AT CATAWBA AND OCONEE
- NOTIFICATION TO INDUSTRY VIA INPO

#### CORRECTIVE ACTION (CONT'D)

#### PLANNED ACTIONS

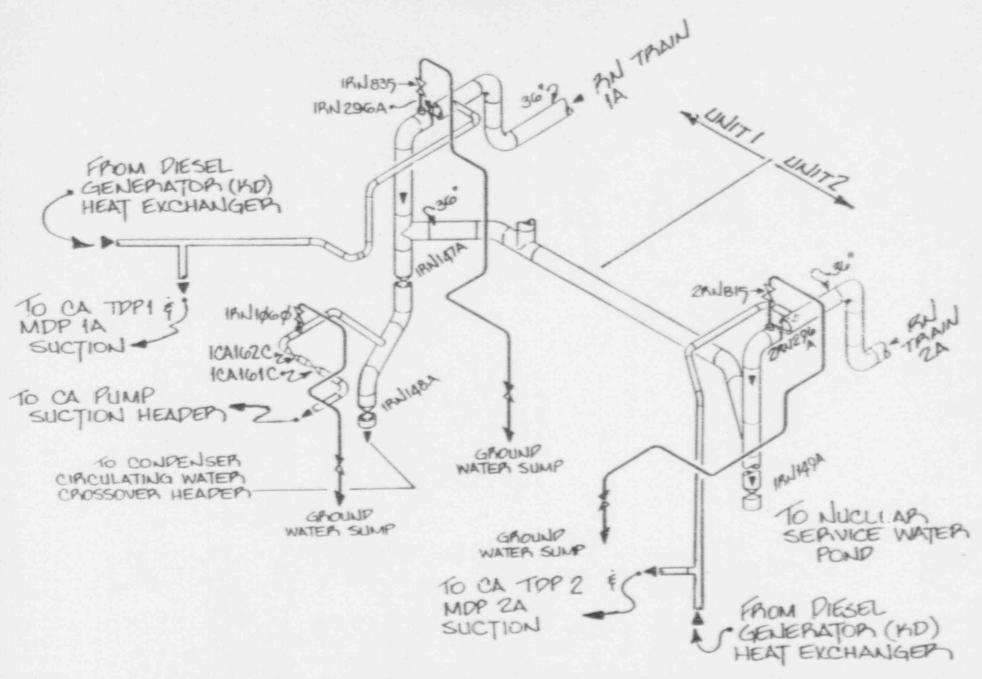
#### SHORT TERM (COMPLETE BY 6/19/92)

- PERMANENTLY INSTALL
  CONTINUOUS VENT AT 1RN1060 TO
  RESTORE SSS OPERABILITY.
  PROCEDURE CHANGES TO PREVENT
  AIR INTRODUCTION INTO SSS
  SUPPLY
- DEVELOP SERVICE WATER SYSTEM VENTING PROCEDURE

#### LONG TERM (BEFORE EOC-8)

- PERMANENTLY INSTALL
CONTINUOUS VENTS AT 1RN835
AND 2RN815

#### MCGUIRE NUCLEAR STATION NUCLEAR SERVICE WATER SYSTEM CORRECTIVE ACTION



#### SAFETY SIGNIFICANCE

ABILITY TO MEET CA SYSTEM DESIGN BASIS AFFECTED

CA PUMP OPERABILITY WITH NORMAL CONDENSATE SUPPLY UNAFFECTED

CONCLUSIVE DEMONSTRATION OF CA PUMP OPERABILITY COULD NOT BE MADE -CONSERVATIVE INOPERABLE CALL

IF AUXILIARY FEEDWATER SYSTEM IS UNAVAILABLE THERE ARE TWO METHODS OF COOLING:

- RESTORATION OF CONDENSATE/ FEEDWATER SYSTEM
- 2) PRIMARY FEED AND BLEED

#### **CLOSING REMARKS**

PROBLEM DISCOVERED BY DUKE ENGINEERS EXTENSIVE INVESTIGATION:

ROOT CAUSE OF PROBLEM IDENTIFIED

CONSERVATIVE EVALUATION OF COMPLEX OPERABILITY IMPLICATIONS

REVIEWS FOR SIMILAR PROBLEMS COMPLETE

PREVIOUSLY UNRECOGNIZED IN INDUSTRY NOTIFICATION MADE VIA INPO

RN SITA SCHEDULED FOR 1992

OPERABILITY RESTORATION:

COMPLETE FOR SAFETY GRADE ASSURED SUPPLIES

COMPLETE FOR UNIT 1 SSS SUPPLY BY 6/19/92

