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

HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

35 JAN 4 A 9 : December 28, 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 30323

Subject: McGuire Nuclear Station

Docket Nos. 50-369 and 50-370

Reference: RII:GAB

NRC/OIE Inspection Report 50-369/84-32 and 50-370/84-29

Dear Mr. O'Reilly:

Pursuant to 10 CFR 2.201, please find attached a response to violation 50-369/84-32-01, 50-370/84-29-01 which was identified in the above referenced inspection report. Duke Power Company does not consider any information contained in this report to be proprietary.

Very truly yours,

H. B. Tucker

PBN/mjf

Attachment

cc: Mr. W. T. Orders

Senior Resident Inspector - NRC

McGuire Nuclear Station

DUKE POWER COMPANY

McGuire Nuclear Station

Response to NRC/OIE Inspection Report 50-369/84-32 and 50-370/84-29

## Violation 50-369/84-32-01, 50-370/84-29-01, Severity Level V:

Technical Specification 6.5.2.9 and 6.5.2.9.c collectively require that audits of unit activities shall be performed under the cognizance of the Nuclear Safety Review Board (NSRB). They further require auditing results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that effect nuclear safety at least once per six months.

Contrary to the above, corrective action audits were not performed at least once per six months. Two audits conducted to meet this requirement were NP-83-12(MC) and NP-84-1 (MC). These audits were performed June 27-28, 1983, and January 16-30, 1984, respectively. This latter audit was not performed within the six month Technical Specification requirement.

## Response:

1. Admission or denial of the alleged violations:

Duke Power Company agrees that the violation occurred as stated.

2. Reasons for the violations if admitted:

The violation occurred because Nuclear Safety Assurance (NSA) thought that time relaxation was permissible for Technical Specification audits as well as surveillances.

3. Corrective steps which have been taken and the results achieved:

The audit schedule has been reviewed against Technical Specifications and scheduled dates changed as necessary to ensure audits and performed at least once per six months.

4. Corrective steps which will be taken to avoid further violations:

Future yearly audit schedules will be prepared such that audits are performed at least once per six months without regards to any "grace period" in accordance with the technical specifications. Documentation has been placed in appropriate files indicating the fact that "grace periods" are not allowed for these technical specification audits.

5. Date when full compliance will be achieved:

Duke Power Company is presently in full compliance with Technical Specification audit schedule requirements in this area.