USNRC REGION II
ATLANTA, GEORGIA

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84 NOV 16 A10:55

November 9, 1984

Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W., Suite 2900
Atlanta, Georgia 30323

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

Reference: NRC/OIE Inspection Report 50-369/84-21 and 50-370/84-18

Dear Mr. O'Reilly:

Pursuant to 10CFR 2.201, please find attached a response to the violation identified in the above referenced inspection report.

Please note that our response to this violation does not address the additional example of non-compliance (i.e. inadequate procedure for nuclear instrumentation testing) as had been requested by Inspection Report 50-369/84-25 and 50-370/84-22 which was transmitted by NRC Region II letter dated November 1, 1984. This letter was not received in time to allow adequate review and preparation of a response. However, please note that the event referred to has been evaluated in LER 370/84-21 which has been previously submitted. Our response to Inspection Report 50-369/84-25, 50-370/84-22 will address the identified additional example of non-compliance.

Duke Power Company does not consider any information contained in this report to be proprietary.

Very truly yours,

Hal B. Tucker

Hal B. Tucker

RLG/mjf

Attachment

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

8503060257 850219
PDR ADOCK 05000369
Q PDR

DUKE POWER COMPANY

McGuire Nuclear Station

Response to NRC/OIE Inspection Report 50-369/84-21 and 50-370/84-18

Violation:

Technical Specification 6.8.1 requires that written procedures be established and implemented covering surveillance testing of safety-related equipment. Implicit in that requirement is that the procedures be adequate. Also, this Technical Specification requires that applicable procedures implement the requirements of NUREG-0737. Item I.C.6, Operating Activities, in effect, require independent verification so as to verify correct performance of operating activities.

Contrary to the above, certain surveillance procedures and drawings were inadequate and failed to incorporate independent verification in that the following conditions were noted:

a. On April 17, 1984, following the completion of surveillance test procedure PT/1/A/4700/27, Containment Spray Check Valve Inservice Test, the licensee failed to reclose a vent valve located in the auxiliary containment spray system. Procedure PT/1/A/4700/27 was inadequate in that there was no procedure step for restoration of the valve and no independent verification to ensure that it was returned to its normal closed position following valve manipulation. From April 17 through June 27, 1984, the vent valve remained open and the Unit 1 reactor was critical during the majority of that time, resulting in a potential loss of containment integrity. (Radiological consequences and system performance during accident conditions were evaluated with the vent valve being open in which it was found to have minimal impact on its design function).

b. On July 3, 1984, while trouble shooting the cause of a failed indicator light of the Unit 2 main steam isolation valve during a routine surveillance of relay circuitry, the technician used an inadequate drawing and erroneously lifted a lead in a normal current path which resulted in a reactor trip.

Response to Violation a:

1. Admission or denial of the alleged violation:

The alleged violation, as written, is denied by Duke Power Company. Valve 1NC68 was not opened by this procedure, therefore, the lack of a procedure step for restoration should not be a violation.

Response to Violation a: (continued)

Duke admits that valve 1NS68 was left open sometime after April 18, 1984 until its closure on June 27, 1984.

2. Reasons for the violation, if admitted:

The violation as written is not admitted.

Improper use of removal and restoration procedures caused valve 1NS68 to be opened and not closed following the draining evaluation.

Additional details are included in LER 369/84-25.

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

Corrective actions are described in the above LER.

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

No further actions are deemed necessary.

5. Date when fall compliance will be achieved. Compliance has been achieved.

Response to Violation b:

1. Admission or denial of the alleged violation:

Duke admits that the alleged violation occurred as stated.

2. Reasons for the violation, if admitted:

As described in LER 370/84-15, the reason for the violation was personnel error.

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

Supervisors have reviewed the event with all personnel who have responsibilities involving work or instrumentation and electronics.

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

No further actions are deemed necessary.

5. Date when full compliance will be achieved.

Compliance has been achieved.