

DMB

DUKE POWER COMPANY

P.O. BOX 33189

CHARLOTTE, N.C. 28242

HAL B. TUCKER  
VICE PRESIDENT  
NUCLEAR PRODUCTION

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TELEPHONE  
(704) 373-4531

February 20, 1986

Dr. J. Nelson Grace, 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:BKR  
NRC/OIE Inspection Report 50-369/85-44 and 50-370/85-45

Dear Dr. Grace:

Pursuant to 10 CFR 2.201, please find attached a response to violation 50-369/85-44-02, 50-370/85-45-02 which was identified in the above referenced inspection report.

Very truly yours,

*H. B. Tucker*

Hal B. Tucker

PBN/jgm

Attachment

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

8603040492 860220  
PDR ADDCK 05000369  
G PDR

IEC

DUKE POWER COMPANY  
McGUIRE NUCLEAR STATION  
NRC/OIE INSPECTION REPORT 50-369/85-44 AND 50-370/85-45

Violation 50-369/85-44-02, 50-370/85-45-02, Severity Level IV  
(Supplement IV):

Technical Specification 6.8.1 stated that written procedures shall be established, implemented and maintained for certain activities including applicable procedures in Appendix A of Regulatory Guide 1.33-1978. Appendix A of Regulatory Guide 1.33 required procedures for radiological surveys.

Station Health Physics Manual, Section 8.3, Radiological Status and Routine Surveys, and its attached Exhibit 8.3-2, Routines and Their Frequencies, stated the requirements for survey type, frequency and documentation.

Contrary to the above, from November 1 to December 13, 1985, approximately ten percent of daily and five percent of weekly surveys were not performed.

Response:

1. Admission or denial of the alleged violation:

Duke Power Company agrees that the violation occurred as stated. The following is an excerpt from the McGuire Station Health Physics Manual Section 8.3 (Radiological Status and Routine Survey's). These sections define what is to be done in the event a routine(s) cannot be performed as specified, and in this section is where Health Physics (HP) committed the written violation.

HP Manual Section 8.3, 8.3.36:

- b) Due to the significant number of routine surveys, it is important to perform each survey on the day it is scheduled. If for some reason a routine cannot be performed on the assigned date, take the following steps to insure that the routine is not skipped:
- 1) Circle the blank space in red, on the weekly sign-off sheet.
  - 2) Note in the comment section the reason for not completing the survey and state the date when it will be done.

NOTE: Daily surveys missed are not to be rescheduled, but the reason shall be noted.

- 3) After the survey has been performed, sign the routine off in its original slot.
- 4) Detailed instructions for performing routine surveys are included in each log book (see Exhibit 8.3-1).

2. Reasons for the violation if admitted:

Heavy workload placed first line supervisor in the position of determining priorities. Station work was supported in lieu of performing HP routines.

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

- A) HP management reinforced the importance of routines.
- B) HP management requires H.P. Coordinator level or above to approve missing routines.
- C) HP management shall define when a routine can be missed.
- D) HP management shall require the responsible Supervisor to review the sign up/sign off log randomly during their shift or at a minimum at end of shift.
- E) HP management shall require a review and sign off at the end of each week by the responsible supervisor, verifying that all specified routines were completed or those missed are recorded properly.
- F) HP Staff representative shall review all logs and some surveys on a monthly frequency and report to HP management. Review not to exceed four (4) hours.

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

The corrective steps in response item 3 above not only correct but will avoid the reoccurrence of this violation.

5. Date when full compliance will be achieved:

The McGuire Nuclear Station Health Physics Section implemented these actions immediately upon notification of violation. Consequently McGuire Nuclear Station is currently in full compliance with Technical Specification requirements in this area.