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March 21, 1988

U.S. Nuclear Regulatory Commission Document Control Desk Washington, D.C. 20555

Subject: McGuire Nuclear Station

Docket Nos. 50-369, -370

NRC/OIE Inspection Report Nos. 50-369/87-43 and 50-370/87-43 Reply to a Notice of Violation Violation 50-369/87-43-02

Gentlemen:

Pursuant to 10CFR 2.201, please find attached Duke Power Company's response to the violation identified in the subject inspection report.

Very truly yours,

Hal B. Tucker

Hal B. Tucker

JBD/252/jgc

Attachment

xc: Dr. J. Nelson Grace
Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta St., NW, Suite 2900
Atlanta, GA 30323

Mr. Darl Hood U.S. Nuclear Regulatory Commission Office of Nuclear Reactor Regulation Washington, D.C. 20555

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

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DUKE POWER COMPANY McGUIRE NUCLEAR STATION REPLY TO A NOTICE OF VIOLATION VIOLATION 50-369/87-43-02

During the NRC inspection conducted on November 21, 1987 - January 20, 1988, the following violation was identified:

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Technical Specification (TS) 6.8.1 requires that written procedures be established, implemented, and maintained covering the operation and maintenance of safety related plant equipment.

Contrary to the above:

- On December 28, 1987 an error on a plant electrical drawing led to an actuation of the Reactor Protection System, causing a reactor trip. While performing monthly surveillance test, PT/1/A/4601/02, Protective System Channel 2 Functional Test, a drawing error on schematic diagram MCM 1399.03-0368 001 caused licensee personnel conducting the test on Channel 2 of narrow range steam generator level instrumentation to make an adjustment in Channel 4 which together with the existing signal in Channel 2 caused the reactor trip.
- 2. On December 28, 1987 licensee personnel failed to follow a procedure step causing an actuation of the Reactor Protection System. While performing periodic test PT/O/A/4600/14C, Nuclear Instrumentation System Source Range Functional Test, licensee personnel elected to manipulate a test switch in the Solid State Protection System without meeting the conditions for doing so as specified in the procedure. This resulted in a reactor trip.

This is a Severity Level IV (Supplement I) violation and applies to Unit 1 only.

RESPONSE:

Example 1

1. Admission or denial of violation:

Duke Power Company admits the violation occurred as stated.

2. Reason for the violation if admitted:

The violation occurred due to a failure to follow procedures. The error occurred during the design of a modification when an illegible portion of the drawing was erased and during drafting incorrect information was obtained from a similar print with a transposed drawing number. This error occurred on both units because the same modification was being made on the other unit and the upgraded drawing was reproduced with only the unit number changed.

Appropriate procedures were in place at the time this work was done that required origination, checking, inspection and approval steps with signatures, but the error made by the originator during the drawing enhancement was not detected.

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

The drawing error has been corrected for both units and all drawings affected by the original design modifications have been reviewed and no additional errors found. Other corrective steps taken in response to this error were counseling individuals responsible for the error and continued emphasis on the importance of checking and inspection responsibilities for all parts of a drawing.

4. Corrective steps planned to avoid further violations:

No further corrective steps are considered to be necessary.

5. The date when full compliance will be achieved:

Duke Power is presently in full compliance.

RESPONSE:

Example 2

1. Admission or denial of violation:

Duke Power Company admits the violation occurred as stated.

2. Reason for the violation if admitted:

While performing pre-startup periodic testing on the Nuclear Instrumentation (NI) system, Instrumentation and Electrical (IAE) personnel initiated a Reactor Trip signal when they did not follow procedure and caused a general warning on Train A of the Solid State Protection System (SSPS) while a general warning existed on Train B of the SSPS. A main feedwater (CF) isolation occurred as a result of the Reactor Trip signal.

- 3. Corrective steps which have been taken and the results achieved:
 - a) Operations (OPS) personnel reset the CF isolation.
 - b) Production Training Support personnel incorporated this incident in existing IAE training as a case study.
- 4. Corrective steps planned to avoid further violations:
 - a) IAE personnel will initiate short term training and communication on the 7300 RPS cabinet door control and provide input to Production Training Services (PTS), OPS, and PRF personnel.
 - b) IAE personnel will initiate a discussion with appropriate IAE, OPS, and Performance personnel regarding SSPS general warnings and each group will provide administrative controls (training, commun_cations, and procedures) as necessary to prevent incidents pertaining to the SSPS general warning alarms.
- 5. The date when full compliance will be achieved:

McGuire will be in compliance with the described corrective actions by 04/01/88 for item (a) above and by 05/01/88 for item (b) above.