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A '18, 1988

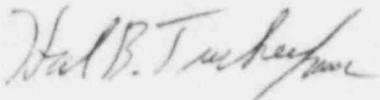
U.S. Nuclear Regulatory Commission  
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Washington, D.C. 20555

Subject: McGuire Nuclear Station  
Docket Nos. 50-369, -370  
NRC/OIE Inspection Report Nos. 50-369,370/88-04  
Reply to a Notice of Violation  
Violation 50-369,370/88-04-02

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

SEL/244/jgc

Attachment

xc: Dr. J. Nelson Grace  
Regional Administrator, Region II  
U.S. Nuclear Regulatory Commission  
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Atlanta, GA 30323

Mr. Darl B. ...  
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 50-369,370/88-04-02

During the NRC inspection conducted on January 21 - February 26, 1988, the following violation with two examples was identified:

Part A

Technical Specification (TS) 6.8.1.a requires that written procedures be established, implemented, maintained covering activities delineated in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Revision 2, February 1978, Appendix A requires, in part, that instructions be prepared for energizing, filling, venting, draining, startup, shutdown, and changing modes of operation of safety related systems including emergency power sources (e.g. diesel generator, batteries) and the chemical and volume control system (including letdown/purification).

McGuire Nuclear Station Procedure IP/O/A/3061/08, Water Addition and Energizing Charge for Vital Batteries, step 10.4.3 requires an output voltage of 141.0 VDC to be established to conduct an equalizing charge on the vital batteries.

Contrary to the above, procedure IP/O/A/3061/08 was not properly implemented in that an output voltage of approximately 148 VDC rather than the required 141.0 VDC was being used on February 10, 1988, when conducting an equalizing charge on vital battery EVCB. Instrument and Electrical (IAE) technicians and engineers were aware of the procedural requirement to establish 141.0 VDC but chose to establish a higher voltage without making the required change to the procedure.

This is one example of two of a Severity Level IV (Supplement I) violation and applies to both units.

RESPONSE:

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 because the technician and engineer involved had discussed equalizing the battery at approximately 148 VDC without considering what the present procedure actually required. The engineering staff had initiated a change to the procedure that was being used. This procedure change was in the approval process at the time. The change would allow a different equalize voltage if engineering staff approval was granted. This caused the engineering staff member to incorrectly believe that the higher equalize voltage was allowable per procedure. The technician then deviated from the procedure based on the information provided to him.

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

Procedure adherence is being discussed in IAE crew meetings.

4. Corrective steps planned to avoid further violations:

No additional corrective actions are planned.

5. The date when full compliance will be achieved:

McGuire Nuclear Station will be in full compliance with the corrective action described above by June 1, 1988.

Part B

Technical Specification (TS) 6.8.1.a requires that written procedures be established, implemented, maintained covering activities delineated in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Revision 2, February 1978, Appendix A requires, in part, that instructions be prepared for energizing, filling, venting, draining, startup, shutdown, and changing modes of operation of safety related systems including emergency power sources (e.g. diesel generator, batteries) and the chemical and volume control system (including letdown and purification).

McGuire Nuclear Station OP/1/A/6200/01, Enclosure 4.7 provides instructions for removing the chemical and volume control (NV) system cation bed demineralizer from service.

Contrary to the above, the procedure for removing the cation bed demineralizer from service, OP/1/A/6200/01 Chemical and Volume Control System, was not properly maintained in that steps were changed during a revision leading to over pressurization of the system. This over pressurization on February 3, 1988, led to the rupture of the diaphragm on valve INV-474 and contaminated spill.

This is the second example of a Severity Level IV (Supplement I) violation and applies to both units.

1. Admission or denial of violation:

Duke Power Company admits the violation occurred as stated.

2. Reason for the violation if admitted:

During the retype of OP/1/A/6200/01 (CVSS) which was approved for use on January 21, 1988, steps 2.1 and 2.2 of Enclosure 4.7 were interchanged. Neither the preparer nor the reviewer of this procedure retype can remember or logically determine why this change would have been made.

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

- a. On February 8, 1988, the procedure was changed and approved to place the two steps in the proper sequence. This change returned the Unit 1 procedure to its original sequence that existed prior to the procedure retype of January 21, 1988. The steps of the Unit 2 procedure were already in the proper sequence.
- b. Personnel involved with the procedure change have been counseled to ensure the technical accuracy of any procedure modification prior to its approval for use at the station.

4. Corrective steps planned to avoid further violations:

No additional corrective actions are planned.

5. The date when full compliance will be achieved:

McGuire Nuclear Station was in full compliance with the corrective actions described above on February 9, 1988.