

Duke Power Company
P.O. Box 33198
Charlotte, N.C. 28242

Hal B. Tucker
Vice President
Nuclear Production
(704)373-4531



DUKE POWER

September 21, 1988

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

Subject: McGuire Nuclear Station
Docket Nos. 50-369, -370
Inspection Report 50-369, 370/88-12
Reply to a Notice of Violation
Supplemental Response

Gentlemen:

Pursuant to 20CFR2.201, please find attached Duke Power Company's revised supplemental response to violation 369, 370/88-12-04 for McGuire Nuclear Station that was submitted to NRC on July 22, 1988.

Should there be any questions concerning this matter, contact S.E. LeRoy at (704) 373-6233.

Very truly yours,

A handwritten signature in cursive script that reads 'Hal B. Tucker'.

Hal B. Tucker

SEL/331/mmf

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, DC 20555

Mr. P.K. Van Doorn
NRC Resident Inspector
McGuire Nuclear Station

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bx: P.M. Abraham
A.V. Carr
R.M. Dulin
R.C. Futrell
R.M. Glover (CNS)
C.W. Graves
W.A. Haller
G.W. Hallman
C.L. Harlin (ONS)
M.D. McIntosh
R.P. Ruth (MNS)
R.O. Sharpe (MNS)
A.R. Sipe (MNS)
J.E. Thomas
QA Tech. Services Manager (EC 12/58)
QA Tech. Services NRC Coordinator (EC 12/55)
S.S. Kilborn (W)
R.L. Gill
S.A. Gewehr
P.B. Nardoci
MC-815-01
(20)

DUKE POWER COMPANY
McGUIRE NUCLEAR STATION
REPLY TO NOTICE OF VIOLATION

SUPPLEMENTAL RESPONSE
(Revised)

Violation 369/88-12-04 and 370/88-12-04

- B. 10 CFR 50, Appendix B, Criterion XI, requires that a test program be established to assure that all testing required to demonstrate that systems and components will perform satisfactorily in service is identified and performed in accordance with written test procedures.

Contrary to the above, the test program established to demonstrate that the turbine driven auxiliary feedwater pumps will perform satisfactory in service was inadequate. The procedure used to test the pumps does not perform the test in the as found condition in that the steam lines to the pump turbine are drained of condensate prior to testing.

This is a Severity Level IV (Supplement I) violation.

Response

1. Admission or Denial of Violation:

This violation is admitted as stated.

2. Reason for the Violation if Admitted:

The first portion of the violation states that, "... the test program established to demonstrate that the turbine driven auxiliary feedwater pumps will perform satisfactory in service was inadequate". This portion of the violation is admitted. None of the test performed on the turbine driven auxiliary feedwater pumps in order to satisfy the requirements of the Technical Specifications or ASME Section XI demonstrate that the turbine will perform satisfactorily in service since the turbine steam supply lines were drained prior to performing any tests on the turbine.

The steam supply lines were routinely drained prior to initiation of any tests on the turbine driven auxiliary feedwater pumps. This was done as a "good operating practice" in order to avoid any potential damage to the turbine from condensate which was not expected to be present in the steam supply lines. In deed, the operating history of the auxiliary feedwater pumps has demonstrated on auto-starts following feedwater transients that the automatic condensate drain feature of the steam supply lines has provided reasonable assurance that condensate will not accumulate and adversely affect the operation of the turbine.

The second portion of the violation which states "the procedure used to test the pumps does not perform the test in the as found condition in that the steam lines to the pump turbine are drained of condensate prior to testing", is not correct. The subject IWP procedure is designed to test the pump ONLY in order to comply with ASME Section XI requirements. The draining of the turbine steam supply lines does not impact or change the as-found condition of the CA pump.

3. Corrective Actions Already Taken:

No additional corrective actions were taken.

4. Corrective Steps to be Taken to Avoid Further Violations:

Station Operations will place the draining of all steam supply lines on the shift rounds sheets. Guidance will be provided to help operators identify blockage in the drain line. This will ensure that lines are drained twice a day normally.

Station Performance will revise PT/1-2/A/4252/07, which is performed in accordance with Technical Specification 4.7.1.2.b.3, to prohibit draining of the steam line prior to performing the test. This will test the turbine driven auxiliary feedwater pump in the as-found condition.

5. Date of Full Compliance:

The station will be in full compliance with corrective measures stated above by October 1, 1988.