

DMB

DUKE POWER COMPANY

P.O. BOX 33189
CHARLOTTE, N.C. 28242

HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

TELEPHONE
(704) 373-4531

COMM 31 P2:03

March 27, 1986

Dr. J. Nelson Grace, Regional Administrator
U.S. Nuclear Regulatory Commission - Region II
101 Marietta Street, NW, Suite 2900
Atlanta, GA 30302

Subject: McGuire Nuclear Station
Docket No. 50-369, 50-370

Reference: RII:
NRC/OIE Inspection Report 50-369/85-39, 50-370/85-40

Dear Dr. Grace:

In response to Mr. V.L. Brownlee's letter of February 21, 1986, please find attached a supplemental response to the deviation which was identified in the above referenced Inspection Report.

Very truly yours,

H.B. Tucker

Hal B. Tucker

JBD/jgm

Attachment

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

8604080194 860327
PDR ADDCK 05000369
Q PDR

IEO1 11

McGUIRE NUCLEAR STATION
RESPONSE TO DEVIATION 50-369/85-39-01 & 370/85-40-01

Deviation

McGuire FSAR Section 6.4.3 and Table 6.2.3-4 stipulate that in place testing of the Control Room Area Ventilation Systems (CV) were in compliance with Regulatory Guide 1.52 (Revision 2, March 1978) which in turn obligates the licensee to ANSI N510-1975.

Contrary to those commitments, a review of completed preoperational tests performed on McGuire Control Room Area Ventilation Trains A and B revealed that Regulatory Guide 1.52 and/or ANSI N510-1975 were not adhered to in that the air-aerosol uniformity tests were not performed as specified.

This deviation is applicable to Units 1 and 2.

Response:

In response to the notice of deviation regarding the lack of preoperational tests for Control Room Area Ventilation Trains A and B, a temporary test was written and conducted on 11/6-7/85 to determine air/aerosol mixing uniformity. Results of this testing met the acceptance, and have been previously reported. McGuire Nuclear Station was in full compliance as of 11/7/85.

The missing preoperational tests resulted from a miscommunication between station and vendor testing personnel, regarding applicable revisions of ANSI N510. Preoperational tests will be required again only in the case of system modifications, and testing will be performed by Duke personnel. Through our awareness of FSAR commitments, further deviations will be avoided.

NRC Concern

The response statement "through awareness of FSAR commitments, further deviations will be avoided" did not provide sufficient detail to determine that your actions are sufficient to assure future compliance.

Supplemental Response:

Preoperational tests will be required to be performed again only in the event of a system modification. Nuclear Station Modifications are implemented under the direction of the Projects group. In processing an NSM, the Projects group draws up an implementation plan, which provides a detailed description of the modification and its impact. Post modification testing is also briefly addressed.

A post modification test (PMT) procedure is followed by the Projects group in implementing an NSM. Under this procedure, meetings are conducted by the responsible Projects Engineer, involving plant and/or design personnel most knowledgeable about a given system. At this time, the appropriate FSAR commitments would be identified, and tests devised to demonstrate compliance with the applicable standards.

Through these administrative controls involving the review of modifications by Duke personnel familiar with FSAR commitments and applicable codes, future deviations involving ventilation system preoperational testing will be avoided.