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May 31, 1988

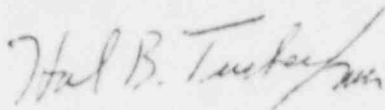
U.S. Nuclear Regulatory Commission
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Washington, D.C. 20555

Subject: McGuire Nuclear Station
Docket Nos. 50-369, -370
NRC/OIE Inspection Report Nos. 50-369,370/88-09
Reply to a Notice of Violation

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/277/bhp

Attachment

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DUKE POWER COMPANY
McGUIRE NUCLEAR STATION
REPLY TO A NOTICE OF VIOLATION

Violation 370/88-09-01:

- 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 surveillance procedures be written and implemented for testing including pressurizer safety valve tests and reactor protection system tests.

McGuire Procedure PT/O/A/4150/05, Pressurizer Safety Valve Setpoint Test, requires that each of three lifts of the valve be within the TS required band of 2485 psig plus or minus one percent (2461 to 2509 psig).

- A-1 Contrary to the above, procedure PT/O/A/4150/05 was not properly implemented in that the second lift of 2NCI on June 11, 1987, was outside of the required band (4 psi high) and the test was signed off as satisfactory by both maintenance and quality control personnel.

This is one example of two of a Severity Level IV violation (Supplement I) and is applicable to Unit 2 only.

RESPONSE:

1. Admission or denial of violation:

Duke Power Company admits the violation occurred as stated.

2. Reason for the violation if admitted:

Both Mechanical Maintenance and Quality Assurance (QA) personnel admit that the procedure was signed in error. The error was the result of a failure to read the instructions in the procedure when signing the data sheet. A contributing factor to the error is that the data sheet requires averaging of the three set point readings, which is not described in the procedure. Furthermore, the data sheet leads one to the conclusion that the test is acceptable if the average is within the range.

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

Corrective steps were taken to review the procedure with the personnel who signed off the test. The personnel were instructed that all three readings are required to be within the required range.

4. Corrective steps planned to avoid further violations:
 - a. Procedure PT/0/A/4150/05 will be revised to include signoffs for documenting each test performed.
 - b. Procedure PT/0/A/4150/05 will be revised to include signoffs for qualified or supervising individuals witnessing the test of the valve.
 - c. All station QA mechanical inspectors will be instructed in the correct application of the procedure.
 - d. All Mechanical Maintenance personnel qualified to perform Procedure PT/0/A/4150/05 will be instructed in the changes to the procedure through the ETQS program.

5. The date when full compliance will be achieved:
 - a. June 1, 1988
 - b. June 1, 1988
 - c. June 15, 1988
 - d. June 1, 1989

- A-2 Contrary to T.S. 6.8.1.a., Procedure PT/2/A/4200/28A, Slave Relay Testing, was not properly maintained in that an error in the procedure caused Unit 2 non-safety containment ventilation systems to inadvertently re-align to alternate power sources on March 22, 1988.

This is the second example of two of a Severity Level IV violation (Supplement I) and is applicable to Unit 2 only.

Response

1. Admission or denial of violation:

Duke Power Company admits the violation occurred.

2. Reason for the violation if admitted:

During the retype of PT/2/A/4200/28A, Slave Relay Testing, a terminal identification (ID) was changed. Neither the preparer nor the reviewer of this procedure retype can determine how or why this change would have been made.

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

The terminal ID in question was replaced with the proper ID. This change returned the procedure to the original sequence that existed prior to the procedure retype.

4. Corrective steps planned to avoid further violations:

A "Remove/Restore Checklist" is being developed for station use in the development of new periodic tests or periodic test (PT) reissues. The intent of this checklist is to provide assurance that the same component or connection is restored after having been removed from service. The PT originator and the Qualified Reviewer would use this element independently to accomplish this goal.

5. The date when full compliance will be achieved:

The "Remove/Restore Checklist" will be developed by June 15, 1988, and implemented in the Performance Section by July 15, 1988.

Violation 369/88-09-02

- B. Technical Specification (TS) 3.7.3 required that, in Modes 1-4, two independent Component Cooling Water (KC) System loops be operable. With only one KC loop operable, both loops must be returned to operable status within 72 hours or the unit must be in at least hot standby within the next 6 hours and in cold shutdown within the following 30 hours.

Contrary to the above, Unit 1 was operated in Mode 1 for greater than 72 hours with KC loop B inoperable between January 29, 1988 and March 9, 1988. KC loop B was inoperable in that the Nuclear Service Water (RN) throttle valve to KC heat exchanger 1B (RN-190B), would not have positioned to provide full design RN flow to the heat exchanger if required to do so in an engineered safety features actuation.

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

Response

1. Admission or denial of violation:

Duke Power Company admits the violation occurred.

2. Reason for the violation if admitted:

Valve RN-190B was discovered with the travel stops in a nonconservative position. It could not be determined when or how the hex nuts on valve RN-190B had come loose from their secured position. A thorough review of work request records and red tag logs failed to produce any record of the valve being worked on during the period in question. However, it is presumed that once they become loose, vibration in the piping and at the valve moved the nuts along the threaded rod to the nonconservative position in which they were found.

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

Performance personnel reset and tightened the travel stops at the correct position as determined by the most recent RN system flow balance. Signs were also placed on valves 1 and 2 RN-89A and 1 and 2 RN-190B that read, "DO NOT MOVE TRAVEL STOPS EXCEPT WHEN MAKING FLOW BALANCE ADJUSTMENTS - LOOK SECURELY AFTER POSITIONING TRAVEL STOPS"

4. Corrective steps planned to avoid further violations:

- a. Station Mechanical Maintenance, appropriate Construction and Maintenance, and NSM core personnel will be required to read a memorandum that warns against the practice of using travel stop adjustments to secure a valve in the closed position.
- b. Loctite thread sealant will be placed on the threads of the hex nuts for travel stop adjustments for valve 1RN-190B.
- c. Performance personnel will evaluate the need to put Loctite thread sealant on the threads of the hex nuts for the travel stop adjustments for valves 2RN-190B, 1RN-89A, and 2RN-89A.

5. The date when full compliance will be achieved:

- a. June 1, 1988
- b. June 1, 1988
- c. August 1, 1988

Correction

The subject inspection report, 50-369(370)/88-09, Page 9, Section 10, Line 13 states that the value for the reduced RN flow rate to the Component Cooling Heat Exchanger is 1000 gpm. The report should state that the reduced RN flow rate to the Component Cooling Heat Exchanger is 1500 gpm.

Violation 369/88-09-03:

- C. Technical Specification (TS) 4.0.5 requires that inservice testing of ASME Code Class 1, 2, and 3 valves be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code.

Article IWV 3200 of Section XI of the ASME Boiler and Pressure Vessel Code required that valves which perform a specific function in shutting down a reactor to the cold shutdown condition or in mitigating the consequences of an accident shall be tested, following maintenance, and prior to the time of being returned to service, to demonstrate that the performance parameters which could be affected by the maintenance are within acceptable limits.

Contrary to the above, Unit 1 Nuclear Service Water (RN) valve RN-21 underwent maintenance in the form of packing adjustment on February 4, 1988, but did not receive a valve stroke timing test to verify valve shutting time to be within required limits.

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

Response

1. Admission or denial of violation:

Duke Power Company admits the violation occurred.

2. Reason for the violation if admitted:

The violation occurred as the result of personnel error. A planner failed to recognize the need for valve 1RN-21A to have a stroke timing test after maintenance and therefore did not note the required test on the work request. Also, a second planner, checking the work of the first planner, failed to notice the omission while reviewing the work request.

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

Valve 1RN-21A was successfully stroke time tested prior to returning Train A of the Unit 1 RN system to service.

4. Corrective steps planned to avoid further violations:

Appropriate planning personnel will be required to review the Incident Investigation Report that describes the event.

5. The date when full compliance will be achieved:

July 1, 1988