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DUKE POWER

October 6, 1988

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

Subject: McGuire Nuclear Station
Docket Nos. 50-369, -370
Inspection Report Nos. 369, 370/88-23
Reply to a Notice of Violation

Gentlemen:

Pursuant to 10CFR2.201, please find attached Duke Power Company's response to violation 370/88-23-01 for the McGuire Nuclear Station.

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

Very truly yours,

Hal B. Tucker

SEL/344/mmf

Attachment

xc: Dr. J. Nelson Grace
Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
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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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October 6, 1988

Page 2

bxc: P.M. Abraham EC2-827
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R.M. Dulin EC-1090
H.E. Edwards EC-724
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W.A. Haller WC-2373
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MC-815.01
(18)

Attachment

Duke Power Company
McGuire Nuclear Station
Reply to Notice of Violation
Inspection Report 50-369, 370/88-23

Violation 370/88-23-01

Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Revision 2, February 1978, Appendix A requires that procedures be written and implemented for procedural adherence, temporary change method, and surveillance tests.

Station Directive 4.2, Permanent Station Procedures, requires a major change to be processed if the method by which a procedure is performed must be changed.

Operations Management Procedure (OMP) 1-2, Use of Procedures, allows a supervisor that holds an SRO license to "N/A" a step if it does not need to be performed.

Surveillance procedure PT/2/A/4204/05, Residual Heat Removal (ND) Valve Stroke Timing - Shutdown, provides the instructions for performing Valve Stroke Timing tests of various ND valves including 2ND58A, ND Heat Exchanger 2A to Centrifugal Charging Pumps 2A and 2B Block.

Example No. 1

Contrary to the above, procedure OP/2/A/6250/02, Auxiliary Feedwater System, step 2.5 was not performed as written and a procedure change was not written. A supervisor holding an SRO license approved performance of this step without processing a change on the false assumption that portions of the step could be marked "N/A" in accordance with OMP 1-2.

Example No. 2

Contrary to the above, procedure PT/2/A/4204/05, Residual Heat Removal (ND) Valve Stroke Timing - Shutdown, was inadequate in that the procedure did not adequately specify system pre-requisite conditions to ensure safe performance of the test. ON July 21, 1988, valve 2ND58A, ND Heat Exchanger 2A to Centrifugal Charging Pumps 2A and 2B Block Valve, was opened in accordance with the procedure allowing pressure in excess of design pressure to be unnecessarily applied to low pressure portions of the Chemical and Volume Control, and Safety Injection Systems.

This is a Severity Level IV (Supplement 1) violation and applies to Unit 2 only.

Reply to Example No. 11. Admission or denial of violation:

The violation is admitted as stated.

2. Reason for the violation if admitted:

The Supervisor involved thought the situation was covered by OMP 1-2. Subsequent review of the OMP revealed this assumption was incorrect. Because the supervisor felt he was correct in directing the operator, he chose not to make a procedure change.

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

None required.

4. Corrective steps planned to avoid further violations:

This incident will be covered with all operating shifts during the upcoming segment of operators requalification training.

5. Date when full compliance will be achieved:

October 31, 1988.

Reply to Example No. 21. Admission or denial of violation:

The violation is admitted as stated.

2. Reason for the violation if admitted:

The valve testing procedure, PT/2/A/4204/05, ND Valve Stroke Timing - Shutdown, did not contain adequate limits or precautions to prevent the test from being conducted with pressure in excess of the design pressure of the involved systems.

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

- a. A written operability determination was received from Duke Design Engineering which evaluated the affected systems and components after the overpressurization.
- b. Valve 2NV-1025 was inspected for possible damage and no damage was found.
- c. Procedures to test Unit 1 and 2 valves ND-58A were revised to ensure that Residual Heat Removal (ND) Pump A discharge pressure is less than Chemical Volume and Control (NV) and Safety Injection (NI) Systems suction pressures.

- d. Systems which connect ECCS systems (e.g. NV, NI, ND, and FW) were reviewed for potential of over pressurization. Procedure changes similar to "c" above were made for the corresponding B train valves (1&2 NI-136), as well as, valves 1&2 FW-27A, for protection of the Refueling Water Storage Tank piping.

4. Corrective steps planned to avoid further violations:

The potential for over pressurizing systems during testing will be evaluated during the valve stroke timing procedures rewrite.

5. Date when full compliance will be achieved:

June 1, 1989.