## DUKE POWER COMPANY P.O. BOX 33189 CHARLOTTE, N.G. 28242

HAL B. TUCKER VICE PRESIDENT NUCLEAR PRODUCTION TELEPHONE (704) 373-4531

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April 8, 1986

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

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

Reference: RII: REW

NRC/OIE Inspection Report 50-369/86-05, 50-370/86-05

Dear Dr. Grace:

Pursuant to 10 CFR 2.201, please find attached a response to violation which was identified in the above referenced Inspection Report.

Very truly yours,

Hal B. Tucker Jun

JBD/jgm

Attachment

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

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## DUKE POWER COMPANY MCGUIRE NUCLEAR STATION RESPONSE TO VIOLATION IN INSPECTION REPORT 50-369/86-05 AND 50-370/86-05

## Violation 50-369/86-05-01 and 50-370/86-05-01, Severity Level IV

Technical Specification (TS) 4.0.5 specifies that ASME Section XI testing of ASME Code Class valves shall be performed as Surveillance Requirements. For ASME Code Class Safety Injection Valves NI 185A and NI 184A (in both Units), ASME Section XI requires that their operation be observed at least once every 2 years to verify that their remote position indicators accurately reflect their operation. TSs 4.0.3 and 4.0.4 specify that failure to perform Surveillance Requirements within the required time interval is a failure to meet Operability Requirements for a Limiting Condition of Operation and that the Operational mode shall not be entered until the Surveillance Requirements have been performed.

Contrary to the above, the licensee had not performed the ASME Section XI (Surveillance Requirements) position indicator testing on valves NI 185A and NI 184B and the Operational Mode had been entered.

## Response

1. Admission or denial of the alleged violation:

Duke Power agrees that the violation occurred as stated in LER 369/86-05, dated March 6, 1986.

2. Reasons for violation:

The reason for the violation was due to inadequate procedures which placed emphasis on FW switchover timing, overlooking visual verification of valve indication requirements of IWV.

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

The valves in question were cycled and their remote indications were visually verified. Previous cycle times for the valves were reviewed to satisfy the trending analysis requirements.

4. Corrective steps which will be taken to avoid further violations:

To avoid further violations: a) The appropriate procedures will be changed to include requirements for visual inspection of correct remote valve position indication for valves Ni-184B and NI-185A for both units; b) All valves listed in the Valve Inservice Testing Program will be reviewed to determine if accurate remote indication of valve position is visually verified.

5. Date when full compliance will be achieved:

Full compliance will be achieved by July 1, 1986.