

ENCLOSURE 1

NOTICE OF VIOLATION

Duke Power Company  
McGuire Units 1 and 2

Docket Nos. 50-369 and 50-370  
License Nos. NPF-9 and NPF-17

During the Nuclear Regulatory Commission (NRC) inspection conducted on April 23, 1988 through May 20, 1988, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), these violations are identified below:

- A. Technical Specification 6.6.1 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 startup, operation and surveillance testing of safety related equipment including auxiliary feedwater systems, diesel generators and associated support equipment.

Technical Specification 4.0.5 requires that inservice testing of ASME Code Class 1, 2, and 3 pumps be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code, 1980 Edition.

ASME Boiler and Pressure Vessel Code, 1980 Edition, Section XI, Subsection IWP, Article IWP-3000, Inservice Test Procedures, Table IWP-3100-2, Allowable Ranges of Test Quantities, specifies vibration ranges to be used, based on pump baseline data, to determine if inservice test results are acceptable or if actions are required.

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Station Directive 2.8.2, Operability Determination, Attachment 1, paragraph 8, requires a technical discussion to be documented as to why the concern identified does not prevent the item from fulfilling its intended safety function.

Station Directive 3.1.19, Safety Tags, paragraph 7.4.4 step 2 states tag removal shall be done in the designated sequence.

1. Contrary to the above, Procedure PT/1/A/4252/01, Auxiliary Feedwater Pump Number 1 Performance Test, was inadequate in that horizontal vibration ranges specified did not correspond to those required by ASME Section XI and pump baseline data.
2. Contrary to the above, station directive 2.8.2 was not properly implemented in that no technical discussion of operability was documented in the operability determination associated with Problem Investigation Report (PIR) O-M88-0089. This PIR concerned the operability of the turbine driven auxiliary feedwater pumps with questionable contact area between the emergency head lever and the tappet nut.
3. Contrary to the above, station directive 3.1.19 was not properly implemented in that the restoration and tag removal performed on May 12, 1988, for work requests 500184 and 083804 was not done in the sequence designated on the Removal and Restoration Record Sheet. This led to an ESF actuation involving swap over of CA B pump suction supply to nuclear service water.
4. Contrary to the above, Procedure PT/1/A/4350-04B, D/C 1B Load Sequence Test, was not properly implemented on May 16, 1988 during a test on Unit 1 in that the requirements of step 12.9 were not performed. This led to an inadvertent actuation of ESF equipment.

This is a severity level IV (Supplement 1) violation.

- 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 1) violation.


- C. Technical Specification 3.7.11 requires that all fire barrier penetrations separating portions of redundant systems important to safe shutdown within a fire area and all sealing devices in fire rated assembly penetrations (fire doors, fire windows, fire dampers, cable piping, and ventilation duct penetration seals) be OPERABLE. With one or more of the above required fire barrier penetrations and/or sealing devices inoperable, within 1 hour either establish a continuous fire watch on at least one side of the affected assembly, or verify the OPERABILITY of fire detectors on at least one side of the inoperable assembly and establish an hourly fire watch patrol.

Contrary to the above, fire doors 601C and 601D were found blocked open on May 9, 1988, rendering them inoperable for an undetermined period of time without stationing a fire watch or verifying the operability of fire detectors on at least one side of the inoperable doors and establishing an hourly fire watch patrol.

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

Pursuant to the provisions of 10 CFR 2.201, Duke Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, McGuire Nuclear Station within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation if admitted, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken.

FOR THE NUCLEAR REGULATORY COMMISSION

  
Virginia L. Brownlee, Chief  
Reactor Projects Branch 3  
Division of Reactor Projects

Dated at Atlanta, Georgia  
this 6 day of June 1988