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

Subject: **McGuire Nuclear Station**
**Docket Nos. 50-369 and 370**
**NRC Inspection Report Nos. 50-369,370/87-04**
**Revision To A Reply To A Notice Of Violation**

Gentlemen:

Pursuant to 10CFR 2.201, please find attached a revision to Violation No. 50-369, 370/87-04-01 identified in the above referenced inspection report. This revision is the result of a commitment associated with Deviation No. 50-369,370/88-12-02. Change bars have been provided.

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

Very truly yours,

Hal B. Tucker

Hal B. Tucker

SEL/362/sel

Attachment

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Mr. P.K. Van Doorn
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DUKE POWER COMPANY
McGUIRE NUCLEAR STATION
VIOLATION RESPONSE

Violation 50-369/87-04-01 and 50-370/87-04-01

A. Technical Specification 6.8.1.a requires that current written approved procedures be established, implemented and maintained covering reactor startup and safety related equipment operation.

Operations Management Procedure 2.5, section 6.6, requires that the operator ensure redundant equipment is operable prior to removing equipment from service.

Contrary to the above, on December 30, 1986, train "B" of containment spray and train "A" of the solid state protection system (SSPS) were removed from service simultaneously. Thus, both trains of containment spray were removed from service simultaneously.

This is a Severity Level IV (Supplement I) Violation and applies to Unit 1 only. This violation is similar to a violation cited in NRC Inspection Report Nos. 50-369/86-08 and 50-370/86-08.

RESPONSE:

1. Admission or denial of violation:

Duke admits the violation occurred as stated.

2. Reason for the violation if admitted:

The violation occurred as the result of several contributing factors:

a) There was insufficient administrative controls to ensure that performance personnel contacted the control room (CR) senior reactor operator (SRO) prior to beginning the test.

b) There was insufficient communication between the Unit 1 reactor operator (RO), the IAE technician, and the CR SRO concerning the SSPS testing. Also, there was insufficient communication between the Unit 1 RO, the Performance technician, and the CR SRO concerning the NS testing.

c) The CR SRO was a shift supervisor who had been on loan to the Technical Training Center for approximately one year as a simulator instructor. He was fulfilling his license requirement to spend one 12-hour shift per quarter in a licensed capacity. Because he had been away from the plant for approximately nine months, he relied more heavily on the veteran control room RO.

d) The operating schedule had not been adhered to during this incident. Normally, "A" and "B" train systems are not tested on the same day.

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

a) SSPS train "B" was returned to operable upon completion of the surveillance testing and NS train "A" was returned to operable upon completion of performance testing.

b) Personnel with inactive licenses are not permitted to make Tech Spec Action Item Logbook (TSAIL) entries independently. TSAIL entries will be made by the control room SRO who holds an active license. The control room SRO may consult various staff personnel as required.

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

a) The performance Unit 1 and Unit 2 periodic test procedures were changed to require an operations SRO sign-off prior to beginning the test.

b) The incident is being covered in licensed operator training emphasizing communication/authority with all licensed operators, both ROs and SROs.

c) To ensure that the operating schedule will be followed, Planning will take the lead in identifying items on IAE schedules that are operating schedule items.

d) In a management staff meeting it was specified that station supervisors who deviate from the operating schedule are to notify the shift engineer on duty.

e) The new Nuclear Production Department "Operability Directive" will be covered in licensed operator training.

f) Licensed operator training is being conducted on the engineered safety feature (ESF) valve study.

g) Licensed operator training on selected "case studies" of applicable industry and station incident reports involving tech spec violations will be conducted.

h) "Selected Guides for Inoperability" that address relationships between LCOs are being developed and are partially implemented. Full implementation will be complete by July, 1987.

i) Station management met with all line and staff management to reemphasize the importance of an in-depth evaluation of tech spec items potentially affecting operability. A separate session was held with the operations shift supervisors to further emphasize the importance of this issue.

5. The date when full compliance will be achieved:

McGuire was or will be in full compliance on:
a) 01/29/87
b) 08/01/87
c) 03/12/87
d) 03/24/87
e) 10/01/87
f) 06/01/87
g) 10/01/87
h) 07/01/87
i) 03/27/87

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

RG 1.33, Revision 2, February 1978 recommends that general plant operating procedures be developed to govern preparation for refueling and refueling equipment operation. Procedures for the startup, operation, and shutdown of containment systems are also recommended.

Contrary to the above, the general plant/containment system operating procedures proved to be inadequate, in that they failed to establish administrative controls to govern the removal and reinstallation of curbing sections designed to minimize the influx of water into the containment air return fans during a loss of coolant accident requiring the actuation of the containment spray system. The removable curb sections had been taken out of both units' containment buildings during a previous refueling outage and were discovered missing on January 30, 1987.

This is a Severity Level IV (Supplement I) Violation.

RESPONSE:

1. Admission or denial of violation:

Duke admits the violation occurred as stated.

2. Reason for the violation if admitted:

Originally, procedure PT/0/A/4200/04 did not include sections for removal of water curbs and replacement of water curbs.

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

Procedure PT/0/A/4200/04 has been rewritten to include sections for removal of water curbs and replacement of water curbs.

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

   Future violations should not occur with the implementation of this revised procedure.

5. The date when full compliance will be achieved:

   The procedure was rewritten and approved on 04/07/87.