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VICE PRESIDENT
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September 14, 1987

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

Subject: McGuire Nuclear Station
Docket Nos. 50-369, -370
NRC/OIE Inspection Report Nos.
50-369/87-21 and 50-370/87-21

Gentlemen:

Pursuant to 10CFR 2.201, please find attached the response to the violation identified in the subject inspection report.

Very truly yours,

Hal B. Tucker

Hal B. Tucker

SEL/117/jgc

Attachment

xc: Dr. J. Nelson Grace
Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta St., NW, Suite 2900
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Mr. W.T. Orders
NRC Resident Inspector
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DUKE POWER COMPANY
McGUIRE NUCLEAR STATION
VIOLATION RESPONSE

Violation 50-369/370/87-21

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

Regulatory Guide 1.33 requires that implementing procedures be developed for each surveillance inspection listed in the Technical Specifications.

PT/2/A/4200/02C, the "Containment Integrity Verification During Core Alterations" performance test, implements the Technical Specification 4.9.4.1 requirement to determine that containment building penetrations are in their required conditions prior to commencing core alteration. Step 12.2.1.4 of that procedure requires that any manual valve which must be physically closed to isolate the penetration be documented on Enclosure 13.7.

Contrary to the above:

1. PT/2/A/4200/02C was not properly implemented on May 31 - June 2, 1987 and again on June 7-8, 1987, in that manual valves 2CF-179, 180, 181 and 182 were closed but not documented as such by completing Enclosure 13.7 of the procedure.

This is one example of three that collectively constitute a Severity Level IV (Supplement I) violation.

RESPONSE:

1. Admission or denial of violation:

The subject violation is admitted.

2. Reason for the violation if admitted:

The appropriate enclosure (13.7) was not used to document valves that were physically closed to isolate affected penetrations because personnel felt they were using Enclosure 13.1 to properly and completely align plant systems. Even though the body of the procedure included instructions to document valve closures on Enclosure 13.7, it was not a signoff step and therefore it was unclear and was subsequently overlooked.

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

Power level was reduced to 10% and personnel made a containment entry and opened the valves. After completing a reverse purge of feedwater flow, normal power escalation was resumed.

4. Corrective steps planned to avoid further violations:

PT/1/A/4200/02C (Containment Integrity Verification During Core Alterations) is undergoing a major revision to make the procedure more understandable and usable to preclude this type of error. The new revision will be in place by 09/18/87 prior to starting Unit 1 core alterations. PT/2/A/4200/02C will be revised and in place by 01/01/88. The procedure revisions will be reviewed with first line supervisors prior to their utilization.

5. The date when full compliance will be achieved:

Full compliance will be achieved by January 1, 1988.

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

Regulatory Guide 1.33 requires that implementing procedures be developed for each surveillance inspection listed in the Technical Specifications.

PT/2/A/4600/03F, the "Containment Cleanliness Inspection" performance test, implements the Technical Specification 4.5.3.1 requirement to verify that no loose debris is present in the containment which could be transported to the containment sump and cause restriction of pump suction during loss of coolant accident conditions.

Contrary to the above:

2. PT/2/A/4600/03F was not thoroughly implemented between June 24-27, 1987, in that several rags and other unacceptable materials were found in the upper and lower containment compartments during NRC inspector walkthroughs conducted on June 29 and July 1, 1987.

This is one example of three that collectively constitute a Severity Level IV (Supplement I) violation.

RESPONSE:

1. Admission or denial of violation:

Duke admits to the basic concern of the violation with the following qualifiers:

- A. The body of PT/2/A/4600/03F was performed 6/24-6/27 although material removal and final procedure closeout were not completed until night shift on 06/29/87. Therefore:

1. Debris in the VX Fan pit which was associated with VX damper work, the holding item for Mode 4 entry, was not in violation of the PT. That is, this work was still in progress at the time of inspection, and was subsequently cleaned up.
 2. The material in the ice condenser is not considered to be a danger to containment sump blockage due to material type and location.
- B. Rags and towels in the pipechase were from cold leg accumulator level instrumentation work which was started after Mode 4 entry. Although it is not known whether the hose was taken in before or after entry into Mode 4, the hose should have been removed.
2. Reason for the violation if admitted:
Incomplete implementation of Station Directive 3.1.8, "Access to Containment".
 3. Corrective steps which have been taken and the results achieved:
The debris was removed.
 4. Corrective steps planned to avoid further violations:
A more rigid method of containment access control above Mode 4 will be established that will provide added assurances that persons entering containment will be required to document that all materials and debris were removed.

All appropriate station personnel were adequately trained/informed of the requirements of Station Directive 3.1.8; therefore IAE management will followup with appropriate counseling of personnel involved with leaving the rags and towels in the pipechase.
 5. The date when full compliance will be achieved:
Completion prior to Unit 1 entry into Mode 4 from the current refueling outage.
- C. Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained covering activities recommended in Appendix A or Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33 requires that implementing procedures be developed for each surveillance inspection listed in the Technical Specifications.

PT/O/A/4200/04, the "Divider Barrier Hatch Seal Inspection" performance test, implements the Technical Specification 4.6.5.5.1 requirement to verify the personnel access door between the containment's upper and lower compartment to be closed prior to increasing the reactor coolant system average temperature above 200 degrees Fahrenheit.

Contrary to the above:

3. PT/O/A/4200/04 was proven inadequate on June 29, 1987, when an NRC inspector found that the personnel access door between the upper and lower containment compartments was open (with an intact tamper seal) despite the documented completion of the performance test on June 27, 1987.

These three examples collectively constitute a Severity Level IV (Supplement I) violation.

RESPONSE:

1. Admission or denial of violation:

The violation is admitted as stated.

2. Reason for the violation if admitted:

The violation occurred as the result of inadequate procedure PT/O/A/4200/04, "Divider Barrier Hatch Seal Inspection." The procedure was inadequate in that it did not provide enough detailed information to ensure that the hatch was properly reinstalled and sealed.

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

Changes were made to the Section 12.3 of the procedure to add reinstallation steps for the hatch that is being inspected. The steps are to be performed in a specified order to ensure the hatch is secured. The procedure changes were completed on July 10, 1987.

4. Corrective steps planned to avoid further violations:

No additional steps are planned at this time.

5. The date when full compliance will be achieved:

The station is currently in full compliance.