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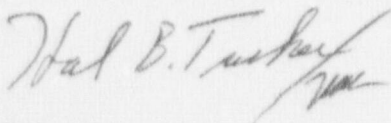
U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555

Subject: McGuire Nuclear Station  
Docket Nos. 50-369, -370  
NRC/OIE Inspection Report Nos.  
50-369/87-14 and 50-370/87-14

Gentlemen:

Pursuant to 10CFR 2.201, please find attached the response to the violations and deviation identified in the above referenced inspection report.

Very truly yours,



Hal B. Tucker

SEL/82/jgm

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. Darl Hood  
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DUKE POWER COMPANY  
McGUIRE NUCLEAR STATION  
VIOLATION RESPONSE

Violation 50-369, 370/87-14-01:

- A. Technical Specification 5.7.1 requires that specified components (e.g., reactor coolant system, reactor vessel) be maintained within the cyclic or transient limits of Table 5.7-1.

Technical Specification 6.10.2 requires that records of transient or operational cycles for those unit components identified in Table 5.7-1 be retained for the duration of the unit Operating License.

Technical Specification 3.4.9.3 requires that a Special Report be prepared and submitted to the commission within 30 days in the event the pressurizer power operated relief valves (PORV) are used to mitigate a reactor coolant system pressure transient.

Station Directive 3.1.23, "Documentation of Allowable Operating Transient Cycles", implements the program for documenting transients at the McGuire Nuclear Station as required by the Technical Specifications.

Contrary to the above:

1. An operating cycle (Unit 1 PORV operation) which occurred on August 27, 1986 was not identified as requiring the completion of a transient cycle report and, as of May 7, 1987, none was completed.
2. Unit 1 and 2 PORV cycles which occurred on August 27, 1986, and November 15, 1986, respectively, were not, as of May 19, 1987, documented in Special Reports to the Commission.

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

RESPONSE:

1. Admission or denial of violation:

Duke Power admits the violation occurred with respect to Technical Specification 3.4.9.3 and Station Directive 3.1.23; however, Technical Specification 5.7.1 and 6.10.2 were not violated because Table 5.7-1 does not include the subject PORVs.

2. Reason for the violation if admitted:

- a. Station Directive 3.1.23 states that it is the responsibility of the Reactor Engineer or his representative (hereafter referred to as the Reactor Engineer) to ensure that the Reactor Operations Logbook and Shift Supervisor's Logbook are periodically reviewed to identify possible limiting transients and/or operational cycles. This directive further specifies that these events will be investigated and documented.

On April 8, 1986, Revision 8 of Station Directive 3.1.23 was implemented. This revision incorporated transient cycle (17), Normal Pressurizer Relief Valve Operation (Low Pressure Mode). Low Pressure Mode PORV cycling in itself is not a design limit transient and was added for the purpose of documentation only.

On August 27, 1986 at 0010, Pressurizer PORV NC-34 actuated in the Low Pressure Mode. The actuation was identified in the Shift Supervisor's Logbook; however, the responsible Reactor Engineer reviewing the Logbook failed to identify the transient as one now included in Station Directive 3.1.23; therefore no Transient Cycle Report was prepared at the time.

- b. The Unit 1 and 2 PORV cycles which occurred on August 27, 1986 and November 15, 1986, respectively, were not documented in Special Reports to the Commission. Even though the cycles had been identified in the Shift Supervisor's Logbook, the responsible Compliance member reviewing the logbook failed to recognize that these events require a Special Report.
3. Corrective steps which have been taken and the results achieved:
    - a. Transient Cycle Report (1/17/1b) was prepared and filed on May 8, 1987 to document the PORV subject cycle. In addition, the other transient cycles, which had been identified by the Station but for which reports had not yet been completed, were processed and filed on May 8, 1987.
    - b. A Special Report was completed on May 27, 1987 and sent to the Commission to document these PORV cycles.
  4. Corrective steps planned to avoid further violations:
    - a. The responsible Reactor Engineer has reviewed Station Directive 3.1.23, and will give training to the other members of the McGuire Reactor Unit to ensure all are familiar with the recent revisions to this directive.

In addition, while Operations personnel have been diligent in recording primary system relief valve actuations in their logbooks, a computer program request has been generated (on June 19, 1987) requesting a program on the Station Operator Aid Computer (OAC) to flag all normal pressurizer relief valve operations. The requested program is intended to provide indication of PORV status, status of PORV block valves, and various system parameters.
    - b. A discussion was held with Compliance members responsible for reviewing control room logbooks to ensure that future PORV cycles would be identified for Special Reports.



5. The date when full compliance will be achieved:

McGuire is considered to be in full compliance with respect to the current requirements of Station Directive 3.1.23 and Technical Specification 3.4.9.3.

However, the planned training and OAC computer program implementation are targeted to be complete by August 31, 1987.

Violation 50-369, 379/87-14-03:

- B. Technical Specification 6.8.1 requires that written approved procedures be established, implemented and maintained covering the operation and maintenance of safety related plant equipment.

Operations Management Procedure 2-5, "Technical Specifications Action Items Logbook," requires that log entries be made when making a system of component inoperable by taking one of its support systems (instrumentation, electrical power) out of service.

Contrary to the above:

1. Operations personnel failed to log the inoperability of the "A" train of the control area ventilation (VC/YC) system during a transfer of its electrical power source on May 5-6, 1987. An entry was made after the fact when the NRC inspector informed the licensee of the deficiency.
2. Operations personnel failed to log the inoperability of the "B" train of VC/YC during a transfer of its electrical power source on May 6-7, 1987.

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

RESPONSE:

1. Admission or denial of violation:

Duke Power admits the violation occurred as stated.

2. Reason for the violation if admitted:

Operations personnel in both cases failed to make the appropriate TSAIL entries even though they were aware of the requirements of OMP2-5 and of the inoperable status of the subject equipment.

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

Proper inoperable equipment determination and TSAIL logging has been stressed to SKO's at recent Shift Supervisor's meetings. It will also be reemphasized in future Shift Supervisor's meetings.

4. Corrective steps planned to avoid further violations:

Information concerning this violation will be forwarded to appropriate personnel so that it will be included in Segment 4 of the 1987 Operator Requalification Training. Also, all licensed personnel will be required to review this incident.

5. The date when full compliance will be achieved:

All licensed operators will have had this information covered with them by November 1, 1987.

Deviation 50-369/87-14-06:

The McGuire Nuclear Station Final Safety Analysis Report (FSAR), Section 9.5.1.2.1, states that the Fire Protection System is designed to meet the standards developed by the National Fire Protection Association (NFPA) where practicable.

NFPA Standard 12A, "Halon 1301 Fire Extinguishing Systems", Section 1-9.4.6, states that, when manifolded, containers shall be adequately mounted and suitably supported in a rack...".

The McGuire Nuclear Station Fire Protection Review Manual responded to positions presented in Appendix A to Branch Technical Position APCS 9.5-1. Position E.4, "Halon Suppression Systems", states that the use of halon fire extinguishing agents should, as a minimum, comply with the requirements of NFPA 12A. The licensee's response failed to take exception to the Branch Technical Position and stated that approved halon 1301 systems were available for the steam-driven auxiliary feedwater (CA) pumps.

Drawing MCM 1206.07-30, Sheet 3, illustrates the Unit 1 CA halon 1301 system as being rack mounted to provide suitable support.

Contrary to the above, the Unit 1 CA halon 1301 system was not constructed in accordance with applicable design drawings and industry standards as committed to the NRC, in that the manifolded containers were not adequately mounted and suitable supported.

RESPONSE:

The deviation is admitted. The cause of the deviation has been attributed to failure to install the support rack as required by design documents. An operability study was conducted which established that the system would have operated properly without additional support and restraint provided by the rack. A rack similar to that existing on the Unit 2 Turbine Driven Feedwater Pump, Halon Fire Suppression system will be installed. Other vendor supplied gaseous fire suppression systems were inspected to assure that gas storage cylinder racks are properly installed. Full compliance will be achieved by September 1, 1987.