ENCLOSURE 1

NOTICE OF VIOLATION

Duke Power Company
McGuire Unit 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 January 20, 1989 through February 27, 1989, 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), the violations are identified below:

A. Technical Specification 6.8.1 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. gulatory Guide 1.33, Revision 2, February 1978, Appendix A, requires that procedures be written and implemented for control of maintenance, repair, replacement, and modification work.

McGuire Maintenance Management Procedure (MMP) 1.0 specifies that corrective maintenance shall require a work request and that the work request describe the work to be performed. MMP 1.0 also specifies that the "Operational Control Accepted" block shall be signed by a responsible representative of the group that gave clearance to begin work indicating operational acceptance of the work.

1. Contrary to the above, Control Room Door seals were repaired on January 17, 1989 without authorization on a work request and contributing to this problem was an unclear description of work to be performed.

2. Contrary to the above, on several times in February, 1989, Auxiliary feedwater resistance temperature detectors were installed and removed by operations, integrated scheduling, and maintenance personnel without an authorized work request.

3. Contrary to the above, on February 17, 1989, the "Operational Control Accepted" block was not signed by a responsible representative of the group that gave clearance to begin work after completion of work on CA-57 (Work Request 96430 NSM). Operational control was accepted by the integrated scheduling shift engineer (Shift Technical Advisor) rather than by operations.

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

B. Technical Specification 6.8.1 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.

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Regulatory Guide 1.33, Revision 2, February 1978, Appendix A, requires that procedures be written to cover start-up, operation, and shutdown of safety related systems including the Chemical and Volume Control system (including letdown purification).

McGuire Procedure CP/O/B/8400/4, Chemistry Procedure for Primary Demineralizer Volume Check and Resin Fill, specifies how to replace demineralizer resin and refill the demineralizer with water.

McGuire Procedure OP/1/A/6200/01, Chemical and Volume Control System, contains instructions for placing the cation bed demineralizer in service.

Contrary to the above, McGuire Procedure CP/O/B/8400/14 was inadequate in that it specified refilling the demineralizer with unborated water. Also, McGuire Procedure OP/1/A/6200/01, Chemical and Volume Control System, was inadequate in that instructions for placing the cation bed demineralizer in service did not specify saturating the demineralizer with boron prior to placing it in service. This led to an inadvertent Reactor Coolant System dilution on December 1, 1988.

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

C. Technical Specification 6.8.1 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 implemented for safety-related activities. Station Directive 2.8.1, Problem Investigation Process requires in paragraph 5.1.1 that "Problems identified that meet the criteria in Attachment 1 shall be documented as soon as practical..." Attachment 1 defines the criteria for writing a PIR (Problem Investigation Report) as follows:

1. Unplanned, unexpected, unanalyzed events, or conditions involving important functions.

2. Degradation, damage, failure, malfunction or loss of plant equipment performing important functions.

3. Deviation from or deficiencies involving code, specifications (includes Tech Specs), QA requirements, or administrative controls involving important functions.".

Contrary to the above, plant deficiencies involving a loss of Residual Heat Removal System and damage to Auxiliary Feedwater system temperature detectors were not documented on PIR.

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

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) admission or denial of the violation, (2) the reason for the violation if admitted, (3) the corrective steps which have been taken and the results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) 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

M. B. Shymlock/for

Alan R. Herdt, Chief
Reactor Projects Branch 3
Division of Reactor Projects

Dated at Atlanta, Georgia
this 30th day of March 1989

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During the Nuclear Regulatory Commission (NRC) inspection conducted on January 20, 1989 through February 27, 1989, 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), the violations are identified below:

A. Technical Specification 6.8.1 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. gulatory Guide 1.33, Revision 2, February 1978, Appendix A, requires that procedures be written and implemented for control of maintenance, repair, replacement, and modification work.

McGuire Maintenance Management Procedure (MMP) 1.0 specifies that corrective maintenance shall require a work request and that the work request describe the work to be performed. MMP 1.0 also specifies that the "Operational Control Accepted" block shall be signed by a responsible representative of the group that gave clearance to begin work indicating operational acceptance of the work.

1. Contrary to the above, Control Room Door seals were repaired on January 17, 1989 without authorization on a work request and contributing to this problem was an unclear description of work to be performed.

2. Contrary to the above, on several times in February, 1989, Auxiliary feedwater resistance temperature detectors were installed and removed by operations, integrated scheduling, and maintenance personnel without an authorized work request.

3. Contrary to the above, on February 17, 1989, the "Operational Control Accepted" block was not signed by a responsible representative of the group that gave clearance to begin work after completion of work on CA-57 (Work Request 96430 NSM). Operational control was accepted by the integrated scheduling shift engineer (Shift Technical Advisor) rather than by operations.

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

B. Technical Specification 6.8.1 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 to cover start-up, operation, and shutdown of safety related systems including the Chemical and Volume Control system (including letdown purification).

McGuire Procedure CP/0/B/8400/4, Chemistry Procedure for Primary Demineralizer Volume Check and Resin Fill, specifies how to replace demineralizer resin and refill the demineralizer with water.

McGuire Procedure OP/1/A/6200/01, Chemical and Volume Control System, contains instructions for placing the cation bed demineralizer in service.

Contrary to the above, McGuire Procedure CP/0/B/8400/14 was inadequate in that it specified refilling the demineralizer with unborated water. Also, McGuire Procedure OP/1/A/6200/01, Chemical and Volume Control System, was inadequate in that instructions for placing the cation bed demineralizer in service did not specify saturating the demineralizer with boron prior to placing it in service. This led to an inadvertent Reactor Coolant System dilution on December 1, 1988.

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

C. Technical Specification 6.8.1 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 implemented for safety-related activities. Station Directive 2.8.1, Problem Investigation Process requires in paragraph 5.1.1 that "Problems identified that meet the criteria in Attachment 1 shall be documented as soon as practical..." Attachment 1 defines the criteria for writing a PIR (Problem Investigation Report) as follows:

1. Unplanned, unexpected, unanalyzed events, or conditions involving important functions.

2. Degradation, damage, failure, malfunction or loss of plant equipment performing important functions.

3. Deviation from or deficiencies involving code, specifications (includes Tech Specs), QA requirements, or administrative controls involving important functions.".

Contrary to the above, plant deficiencies involving a loss of Residual Heat Removal System and damage to Auxiliary Feedwater system temperature detectors were not documented on PIR.

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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) admission or denial of the violation, (2) the reason for the violation if admitted, (3) the corrective steps which have been taken and the results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) 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

W B Shymlock for

Alan R. Herdt, Chief
Reactor Projects Branch 3
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Dated at Atlanta, Georgia
this 30th day of March 1989