

DUKE POWER COMPANY

P.O. BOX 33189

CHARLOTTE, N.C. 28242

HAL B. TUCKER

VICE PRESIDENT  
NUCLEAR PRODUCTION

TELEPHONE  
(704) 373-4531

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

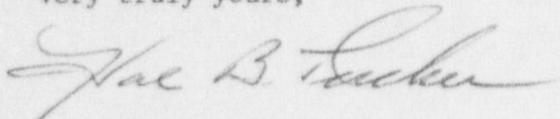
Subject: McGuire Nuclear Station  
Docket Nos. 50-369, 370  
Inspection Report Nos. 369, 370/89-14  
Reply to a Notice of Violation

Gentlemen:

Pursuant to 10CFR.201, please find attached Duke Power Company's response to Violation 369, 370/89-14-01 for the McGuire Nuclear Station.

Should there be any questions concerning this matter, contact W. T. Byers at (704) 373-6194.

Very truly yours,



Hal B. Tucker

WTB89/lcs

Attachment

xc: Mr. S. D. Ebnetter  
Regional Administrator, Region II  
U. S. Nuclear Regulatory Commission  
101 Marietta St., NW, Suite 2900  
Atlanta, Georgia 30323

Mr. Darl Hood  
U. S. Nuclear Regulatory Commission  
Office of Nuclear Reactor Regulation  
Washington, D. C. 20555

Mr. P. K. VanDoorn  
NRC Resident Inspector  
McGuire Nuclear Station

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McGuire Nuclear Station  
Response to Violation

Violation 50-369(370)/89-14-01

Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained covering the activities recommended in Appendix A or 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 surveillance tests.

McGuire Procedures PT/1 and 2/A/425503A and B, SM Valve Stroke Timing (Shutdown), contain instructions for testing the Main Steam Isolation Valves. The valves are required to close within 5 seconds without air assist per the Final Safety Analysis Report, Section 10.3.2.

Contrary to the above, McGuire procedures PT/1 and 2/A/4255/03A and 03B were inadequate in that they specified testing of the Main Steam Isolation Valves with air assist contrary to the assumed conditions in the final safety analysis report.

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

Response:

- (1) Admission or denial of the alleged violation:

McGuire admits the violation occurred as stated.

- (2) The reason for the violation (if admitted):

The violation occurred due to design deficiency. The Main Steam Isolation Valves (safety related) were designed and installed with an air assist feature supplied by the instrument air system, which is not a safety related system.

- (3) The corrective steps which have been taken and the results achieved:

The operability of the valves was evaluated by Design Engineering; the valves were found to be operable.

Procedures PT/1 & 2/A/4225/03 A & B have been changed to remove the air assist feature from the MSIVs during testing.

All other safety-related valves have been evaluated to determine if it is appropriate to remove an air assist feature during testing; no additional valves were identified.

- (4) The corrective steps which will be taken to avoid future violations:

No further actions are considered necessary.

- (5) Date when full compliance will be achieved:

McGuire presently is in full compliance.

Additional Response:

In reference to your concerns referring to our management controls which allowed corrective actions to an operability concern not being accomplished in a reasonable time period, we have completed the following corrective actions.

A letter was prepared and distributed to all major operating experience contacts emphasizing the need to be timely in conducting evaluations. The letter further emphasized the requirements of the departmental directive concerning evaluations of operating experience documents. This directive states that items issued for resolution under the "normal" evaluation accountability should be evaluated within 90 days of issue. Those items issued as "immediate" should be addressed within 30 days of issue. Failure to respond within 15 working days will result in a letter of escalation being issued to the next level of management up to and including the Vice President of the affected department.

The letter issued to major program contacts also emphasized the need to communicate concerns and corrective actions with station personnel to assure they are cognizant of the important issues and are in a position to act on the problem once the proper documentation has been prepared. This also includes the prompt identification of issues involving operability to assure such items are communicated to appropriate personnel and the assessments made as quickly as possible.

We feel that this occurrence was an isolated incident and by recommunicating our policy to all concerned, this should prevent a reoccurrence of this incident.