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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, 370/89-01
Reply to a Notice of Violation

Gentlemen:

Pursuant to 10CFR.201, please find attached Duke Power Company's response to Violation 369, 370/89-01-01, 369, 370/89-01-04, and 369, 370-89-01-07 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

Hal B. Tucker

WTB42/lcs

Attachment

xc: Mr. S. D. Ebneter
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McGuire Nuclear Station
Response to Violations

Violation 369(370)/89-01-01

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. Regulatory 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.

Response to Violation

Example 1:

1. Admission or denial of the violation:

The violation is admitted as stated.

2. Reason for the violation if admitted:

The reason for the violation was the work request (WR) was inadvertently scheduled for a time that was contrary to the instructions of the originator of the WR. The WR was not appropriately filed with a "pending status". Also, given that the WR was improperly scheduled, the misleading wording used in the description of the WR led the individual involved to misinterpret its meaning.

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

This incident was reviewed with appropriate Maintenance and Planning personnel.

4. The corrective steps which will be taken to avoid future violations:

MMP 1.5 is being developed and will incorporate an improved means of controlling work requests of pending status.

5. The date when full compliance will be achieved:

MMP 1.5 will be in place by July 1, 1989.

Example 2:

1. Admission or denial of the violation:

The violation is admitted as stated.

2. Reason for the violation if admitted:

The personnel involved inappropriately commenced work without putting the Work Request through the work control process. Also, the WR that was generated did not specifically identify the proper sequence of steps for removal and replacement of the RTDs.

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

This incident was reviewed in Operations, Integrated Scheduling, and Maintenance Staff Meetings.

4. The corrective steps which will be taken to avoid future violations:

This incident has been put on the Station Manager's Staff Meeting agenda and will be covered with all station groups.

5. The date when full compliance will be achieved:

All corrective actions will be complete by July 1, 1989.

Example 3:

1. Admission or denial of the violation:

The violation is admitted as stated.

2. Reason for the violation if admitted:

The reason for the violation is an inconsistency exists between the Work Request controlling procedure, MMP 1.0, the Operations procedure for operational control acceptance for NSMs, OMP 1-11, and past practices. MMP 1.0 does not allow any exceptions for operational control acceptance, and OMP 1-11 allows for a "designee" of the Operations Staff personnel responsible for operational control of NSM WRs. It has been past practice to interpret "designee" as the Shift Manager.

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

A. MMP 1.0 was revised to allow operational control to be accepted by the Shift Manager for certain situations.

B. OMP 1-11 was revised to clarify that the "designee" can be a Shift Manager.

4. The corrective steps which will be taken to avoid future violations:

No further corrective actions are considered to be necessary.

5. The date when full compliance will be achieved:

McGuire is presently in full compliance.

Violation 369/89-01-04

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 be 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.

Response to Violation:

1. Admission or denial of the violation:

   The violation is admitted as stated.

2. Reason for the violation if admitted:

   The violation occurred due to inadequate procedural guidance. Neither Operations nor Chemistry procedures currently address the possibility of altering Reactor Coolant System boron concentration when placing a Chemical and Volume Control System (CVCS) cation bed in service.

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

Problem Investigation Report (PIR) number 1-M89-0005 was initiated.

4. The corrective steps which will be taken to avoid future violations:

A. Operations procedures OP/1,2/A/6200/01 will be revised to incorporate steps for flushing the CVCS cation bed demineralizer to the boron sampling system recycle holdup tank.

B. Chemistry procedure CP/0/A/8400/14 will be revised to include verification of primary chemistry whenever a CVCS demineralizer is loaded and ready for service. This will help ensure proper tracking of demineralizer status.

C. A Chemistry procedure will be established for the use and control of all CVCS demineralizers. This procedure will include a means for proper documentation of the current status of demineralizers, and provide specific instructions as to how and when Operations is to be directed to flush the demineralizers prior to being placed into service.

D. Training of appropriate personnel will be conducted to ensure a thorough understanding of the cause and consequences of this event, as well as any procedural changes made.

5. The date when full compliance will be achieved:

All corrective actions will be completed by October 15, 1989.

Violation 369(370)/89-01-07

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 a PIR.

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

Response to Violation:

1. Admission or denial of the violation:

McGuire admits the violation occurred as stated.

2. Reason for the violation if admitted:

A. A PIR was not written for the loss of RHR event because Maintenance personnel involved thought the incident had been reported and that another station group, Operations or Compliance, had initiated the required PIR.

B. A PIR was not written for the damaged auxiliary feedwater system temperature detectors because station groups do not ordinarily initiate PIRs for routine corrective action work requests. A work request had already been generated to repair the subject detectors.

C. A contributory cause to both examples is that the initiating criteria for PIRs is not consistently interpreted by the various groups at McGuire because of the broad scope of categories of types of problems.

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

A. PIR 1-M89-0059 was initiated for the loss of residual heat removal system and the following corrective actions were taken:

(1) A Mini-APE (Abnormal Plant Event) meeting was held to determine the root cause of the event.

(2) An audit of controlled copies of drawings in the control room was performed and out-of-date revisions were immediately updated.
(3) The frequency of review of control room drawings was increased from annual to semi-annual and prior to outages.
(4) IAE work crews working on 7300 equipment were made aware of this incident in crew meetings.

B. PIR 1-M89-0054 was initiated on the damaged Auxiliary Feedwater system temperature detectors.

C. This violation was reviewed and discussed in a Maintenance Engineering Services Staff Meeting.

4. The corrective steps which will be taken to avoid future violations:

A task force will be formed to thoroughly review the Problem Investigation Program and associated Directives. This review will include clarifying the initiation criteria for PIRs and other program improvements.

5. The date when full compliance will be achieved:

All corrective actions will be complete by December 31, 1989.