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 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 960812 ltr re violations noted in insp repts
 50-269/96-10, 50-270/96-10 & 50-287/96-10 on 960602-0713.C/A:
 Abnormal Procedure for dropped CR, AP/1.2.3/A/1700/15 &
 process qualification documentation requirements revised.

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DUKE POWER

September 11, 1996

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Subject: Oconee Nuclear Site
Docket No. 50-269, -270, -287
Inspection Report 50-269, -270, -287/96-10
Reply to Notice of Violation

Dear Sir:

By letter dated August 12, 1996, the NRC transmitted a Notice of Violation related to an NRC inspection conducted from June 2 - July 13, 1996.

Violation 96-10-01 stated that Technical Specifications were not met when Flux/Flow/Imbalance trip setpoints were not reset within four hours. Duke Power Company acknowledges the violation.

Violation 96-10-03 concerns the lack of adequate independent review of welding inspection qualifications. Duke Power Company acknowledges the violation. While the attached response deals specifically with the qualification review process, we are also evaluating other aspects of the Duke Power Welding Program for potential improvements.

Pursuant to 10 CFR 2.201, Attachment 1 and Attachment 2 provide a written reply to the violations identified in the subject inspection report.

9609180122 960911
PDR ADDCK 05000269
G PDR

Very truly yours,

BW Hampton for
J. W. Hampton

TED 1/1

170058

Attachments

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September 11, 1996
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cc: Mr. S. D. Ebnetter, Regional Administrator
U.S. Nuclear Regulatory Commission, Region II

Mr. D. E. LaBarge, Project Manager
Office of Nuclear Reactor Regulation

Mr. M. A. Scott
Senior Resident Inspector
Oconee Nuclear Site

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September 11, 1996
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bcc:	B. L. Peele	ON01VP
	P. E. Mabry	ON0102
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	G. A. Copp	EC050
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	M. S. Kitlan	CN01RC
	R. L. Gill	EC12R
	R. N. Casler	
	J. O. Barbour	
	ELL - EC050	
	NSRB - EC05N	

Attachment 1
Reply to Notice of Violation
Violation 96-10-01 Severity Level IV

Restatement of the violation

Tech Spec 3.5.2.2.d.2.b states in part that reactor thermal power shall be reduced to less than 60% of the allowed power for the reactor coolant pump combination within one hour and the Nuclear Overpower Trip Setpoints, based on flux and flux/flow/imbalance, shall be reduced within the next four hours to 65.5% of the thermal power value allowable for the reactor coolant pump combination.

Contrary to the above, on July 6, 1996, the licensee did not reduce the Nuclear Overpower Trip Setpoints for the flux/flow/imbalance after reducing power to less than 60% when Control Rod 3 in Group 7 dropped into the core.

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

1. The reason for the violation:

Duke Power Company acknowledges the violation.

A root cause analysis was performed for this event as part of the LER 270/96-02. The event was caused by a failure to properly communicate required actions from the Shift Work Manager to the Maintenance Supervisor when responding to a dropped control rod. The Shift Work Manager was asked to reset RPS setpoints per Technical Specifications by the Operations Unit Supervisor. The Shift Work Manager, in turn, requested the Maintenance Supervisor to reset the high flux RPS trip setpoints, but did not specifically mention resetting the flux/flow/imbalance setpoints. The Maintenance Supervisor used the procedure that only resets the high flux setpoint instead of a similar procedure that would have reset both the high flux and flux/flow/imbalance setpoints.

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Violation 96-10-01 Severity Level IV

2. Corrective steps taken and the results achieved:

The Shift Work Manager involved has been counseled regarding the importance of precise and specific communication. The event was discussed with the Shift Work Manager Team during a team meeting.

The Abnormal Procedure for a dropped control rod, AP/1,2,3/A/1700/15, has been changed to include independent steps for resetting the high flux and flux/flow/imbalance trip setpoints. A note has been added to the procedure to state the necessity to perform steps in a timely manner.

The Alarm Response Guide for the Quadrant Power Tilt statalarm has been updated and approved to include separate steps for changing the high flux and flux/flow/imbalance setpoints.

3. The corrective steps that will be taken to avoid further violations:

There are several initiatives currently in progress at Oconee to improve verbal instructions and questioning attitude. One of these is a six-part communication on "Improving Human Performance Results." This initiative is to be used by all site supervisors and managers to recommunicate both management's expectation for using the tools and to provide an additional opportunity to ensure everyone understands how the tools must be used.

Oconee Site Directive 1.3.8, Communication Standards, has been written to describe proper communication techniques.

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Reply to Notice of Violation
Violation 96-10-01 Severity Level IV

4. The date when full compliance will be achieved:

Duke Power is in full compliance.

Attachment 2
Reply to Notice of Violation
Violation 96-10-03 Severity Level IV

Restatement of the violation:

10 CFR 50, Appendix B, Criterion X, requires that inspection of activities affecting quality be performed by individuals other than those performing the activity being inspected.

Standard, ANSI N18.7-1976/ANS-3.2, which implements Regulatory Guide 1.33 Revision 2 requirements, is applicable by reference under Table 17.0-1 of the licensee's Quality Assurance (QA) Topical Report, Duke-1. Paragraph 5.2.17 of this Standard requires that inspections, examinations, measurements or tests of materials or activities shall be performed... by qualified individuals other than those who performed or directly supervised the activity being inspected.

Contrary to the above, on June 4, 1996, inspections, examinations, measurements...were not being performed by individuals other than those who performed the activity being inspected in that a single individual welded/brazed and tested specimens, qualified the process, performed Quality Control inspections and QA reviews, and certified the qualification of weld procedures, L-129D, L-137D, L-131D, L-133D and L-134D.

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

1. The reason for the violation:

Duke Power Company acknowledges the violation. The reason for the violation is lack of sufficient guidance in the Duke Power Welding Program, Procedure L-100, to assure the required independence of the individual performing the review of completed welding or brazing procedure qualifications. The Duke Power Welding Program is based on Section IX of the ASME Boiler and Pressure Vessel Code

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Reply to Notice of Violation
Violation 96-10-03 Severity Level IV

(Section IX), latest edition, as stated in paragraph 5.1.1 of Procedure L-100. The Program is used for welding work on both nuclear and non-nuclear applications within Duke Power Company. The responsibility for the administration of the Program, for the research and development of new welding or brazing processes, and documentation of those processes on Procedure Qualification Records (PQRs), as described in Section IX, is assigned to the Analytical and Predictive Technologies (APT) Section of the Electric System Support (ESS) Department.

Section IX was developed and used for both nuclear and non-nuclear welding. Section IX does not address independence of any of the individuals who perform work associated with the research and qualification of welding or brazing procedures, or the subsequent documentation of this activity on PQRs. The PQR has spaces for the name of the individual who makes the test weld or brazement, the name of the individual who performed the tests required by Section IX, and the signature of the person who accepts the PQR for the responsible company.

The PQR used by Duke is taken directly from Section IX. Consequently, the documentation of an independent review to meet the requirements of ANSI N18.7-1976 is not contained on the PQR. The Duke-specific cover sheet that is attached to each PQR does contain signature blanks that are currently titled "Approved By" and "Quality Assurance Review". The intent of the Duke-specific cover sheet is to ensure the requirements of paragraph 5.2.15 of ANSI N-18.7-1976 are met by requiring the individual performing the independent review to sign the "Quality Assurance Review" block.

Procedure L-100 governs the generation of PQRs. However, procedure L-100 did not adequately reflect the independent review requirements of ANSI N-18.7-1976. Due to the lack of guidance provided by this procedure, it was not clear that the individual who signs the "Quality Assurance Review"

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Violation 96-10-03 Severity Level IV

blank cannot directly participate in the development of the PQR. As a result, in some cases, the independent reviewer did inappropriately participate in the development of the PQR.

2. Corrective steps taken and results achieved:

To date, steps have been taken to assure that all individuals involved with PQR development and review have a clear understanding of the requirement for the independence of the individual who performs the PQR review and signs the "Quality Assurance Review" blank.

A meeting was held by several NGD management personnel, APT management, and responsible staff, to discuss the requirements of 10 CFR 50 Appendix B and ANSI N18.7-1976. At this meeting, management emphasized the independent review requirements, and achieved consensus among the affected organizations on the corrective actions necessary to avoid further violations. It was agreed that the individual signing the "Quality Assurance Review" blank is signifying an independent technical review of the entire development process for that PQR. It was further agreed that the individual performing this review can be a member of the same organization or group as the individual(s) who developed the PQR as is allowed by section 17.3.2.14 of the Duke Power Topical Report Duke-1 "Quality Assurance Program."

3. The corrective steps that will be taken to avoid further violations:

Duke Power will revise the process qualification documentation requirements in Procedure L-100 to clarify the intent and wording of the signature blocks on the PQRs and cover sheets. As part of the revision, the titles of the signature blanks on the PQR cover sheets will be changed

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Violation 96-10-03 Severity Level IV

to more accurately reflect their intended purpose of documenting:

- 1) the individual who prepared or revised the PQR, and
- 2) the individual who performed the technical review of the completed PQR.

In addition, words will be added by the revision to define the required independence of the individual performing the technical review. Independence in this case means that the individual performing the review cannot have had any part in the development or revision of a particular PQR.

These revisions will be completed by November 15, 1996.

In addition, although not specifically addressed in the violation, procedures which govern field welding or brazing work will be reviewed to ensure that adequate guidance exists related to the review and inspection requirements.

4. The date when full compliance will be achieved:

Duke Power is currently in full compliance. Corrective actions taken to date will ensure that PQRs receive proper independent review per ANSI N 18.7-1976, until revisions to L-100, and PQR cover sheets are complete.