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SUBJECT: Responds to NRC 970310 ltr re violations noted in insp repts
50-269/96-20, 50-270/96-20 & 50-287/96-20. Corrective actions:
revised Maint Insp Guidelines for Reactor Bldg Insp, reviewed
Operations Procedures & conducted training on procedures.

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DUKE POWER

April 9, 1997

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

Subject: Oconee Nuclear Site
Docket Nos. 50-269, -270, -287
Inspection Report 50-269, -270, -287/96-20
Reply to Notice of Violation

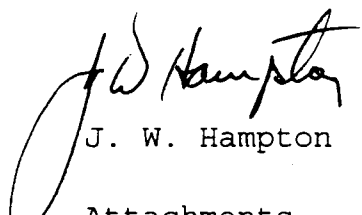
Gentlemen:

By letter dated March 10, 1997, the NRC issued two
Notices of Violation as described in Inspection Report
No. 50-269/96-20, 50-270/96-20, and 50-287/96-20.

Duke Power acknowledges these violations. Accordingly,
Duke is proposing corrective actions, as described in the
attachments, to address the root causes.

Pursuant to the provisions of 10 CFR 2.201, Attachment 1
and Attachment 2 provide written responses to the subject
violations as identified in the subject Inspection
Report.

Very truly yours,


J. W. Hampton

Attachments

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IEDI/

NRC Document Control Desk

April 9, 1997

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cc: Mr. L. A. Reyes, 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

Attachment 1
Reply to Notice of Violation (Reply)
Violation 50-269/96-20-04

Restatement of the Violation

10 CFR 50 Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions and/or procedures, of a type appropriate for the circumstances and shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, activities affecting quality were not prescribed by documented instructions and/or procedures with appropriate qualitative acceptance criteria. Specifically, as of January 20, 1997, there was not an implementing procedure at the Oconee Nuclear Station to ensure the Reactor Buildings for all three units were returned to proper material configuration prior to power operation.

Reply to the Notice of Violation

1. The reason for the violation:

Duke Power Company acknowledges this violation.

The reason for not having a procedure for Reactor Building close-out is that ONS was not aware that the existing program for housekeeping inspections was deficient.

The existing program has guidelines for Reactor Building inspections. These guidelines are used by the Maintenance Quality Control group to perform the Reactor Building inspection. Nuclear Site Directive 104, Housekeeping, Material Condition, and Foreign Material Exclusion, gives management expectations applicable to the whole site. However, it does not specifically assign

responsibility to any group for procedure development or definition of acceptance criteria for inspections of the Reactor Building. The roles and responsibilities are not well defined. Although Oconee Nuclear Station performs a Reactor Building inspection at the end of an outage, the requirements for this inspection were not integrated into a formal program.

2. The corrective steps that have been taken and the results achieved:

The Maintenance Inspection Guidelines for Reactor Building Inspection (QAF_1A) was revised on 2/6/97 to include directions for the inspection of material condition of the Reactor Building. The revised guidelines were implemented for the inspection of Units 1 and 3 Reactor Buildings. Also, work orders were initiated for the Unit 1 Reactor Building Inspection (WO 97012091-01) and Unit 3 Reactor Building Inspection (WO 97016704-01.) The results of the inspections were documented in these work orders.

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

NSD-104 will be revised to specifically assign the following roles and responsibilities:

- a) Engineering will be assigned responsibility for defining the standards of acceptability for reactor building cleanliness (housekeeping) as a required condition for unit startup.
- b) Maintenance will be assigned the responsibility for development and implementation of procedures for reactor building housekeeping inspection prior to startup. The inspection guidelines for inspection of the Reactor Building will be reviewed and revised based on Engineering defining the standards of acceptability (item 3a) and will be documented as noted in item 3b.

c). Also, appropriate work processes will be revised to capture the requirement for performing reactor building inspections prior to unit startup.

4. The date when full compliance will be achieved:

Oconee Nuclear Station will be in full compliance by September 30, 1997.

Attachment 2
Reply to Notice of Violation
Violation 96-20-06

Technical Specification, Section 6.4.1 requires that the station shall be operated and maintained in accordance with approved procedures. Written procedures shall be provided with appropriate check-off lists and instructions shall be provided for conditions which include normal startup, operation and shutdown of the facility, and the technical review and control program implementation.

Nuclear Station Directive NSD 703.12. Revision 14, Administrative Hold of Procedures, provides control program implementing directions for placing procedures on "Administrative Hold" when changes to the procedures are required. This Directive requires that the applicable procedure shall be removed from the files and placed into a designated Administrative Hold file, and that working copies of the affected procedure shall be destroyed.

Contrary to the above, the station was not maintained in accordance with approved procedures, in that Unit 2 Operations Procedure OP/2/A/1106/14, Moisture Separator Reheater (MSR), was not placed on "Administrative Hold" after necessary changes to the procedure were identified as part of a controlled startup of the MSR system on May 7, 1996. (That startup had identified the need for special precautions and guidance to make the procedure acceptable for startup at power while preventing water hammer events.) As a result, the subsequent use of Operations Procedure OP/2/A/1106/14, without the special precautions and guidance incorporated, was a major factor that contributed to the Unit 2 September 24, 1996, waterhammer event.

Reply to the Notice of Violation

1. The reason for the violation:

Duke Power Company acknowledges this violation.

The reason the procedure was not placed on "Administrative Hold" after necessary changes to the procedure were identified was the lack of familiarity of Operations Management Procedure (OMP) 1-9, which specifies the requirements for placing procedures on administrative hold.

Concerning the Moisture Separator Reheater procedure, ONS management recognizes that revisions should have been made in a more timely manner, or the procedure should have been placed on administrative hold until changes could be implemented. The intent was to have these changes implemented prior to completion of the next scheduled outage. In the interim, the decision was made to supplement the procedure with verbal communications. However, this alternate method was not effective. Had we incorporated precautions and guidance into the procedures, the heater drain system would have been less susceptible to the waterhammer event that injured seven of our employees.

2. The corrective steps that have been taken and the results achieved:

All Operations procedures were reviewed and the appropriate procedures were placed on hold.

The Operations Maintenance Procedures were reviewed to determine if they adequately and clearly addressed the procedure hold process. As a result of this review, OMP 1-9 was revised to clarify:

- The criteria for placing a procedure on hold.
- The steps needed to place a procedure on hold and remove a procedure from hold.

Training was conducted for operations personnel regarding the revised procedure hold process. Operations has a heightened sensitivity for the potential consequences of waterhammer events and has lowered its threshold for placing procedures on administrative hold.

The revised Operations procedure hold guidelines were reviewed within organizations outside Operations. The review was performed in order to determine if

clarification of the procedure hold process was necessary within these organizations.

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

The upgraded procedure hold process is adequate. Through training, operators have a better understanding of the procedure hold process and a lower threshold for placing procedures on administrative hold. This conclusion is supported by the fact that there has been a significant increase in the number of procedures placed on hold in the last few months versus the number of procedures placed on hold prior to the waterhammer event.

4. The date when full compliance will be achieved:

Oconee Nuclear Station is currently in full compliance.