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SUBJECT: Forwards commitments re remaining corrective actions & associated completion dates re insp repts 50/269/97-07, 50-270/97-07, 50-287/97-07, 50-269/97-08, 50-270/97-08 & 50/287/97-08 as requested on 970723.

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July 28, 1997

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Commitments from July 23, 1997 Predecisional
Enforcement Conference

A predecisional enforcement conference was held in the Region II offices on July 23, 1997 to discuss apparent violations identified in NRC Inspection Reports 50-269, 270, 287/97-07 and 97-08. At this meeting, Duke Energy Corporation (Duke) described completed and remaining corrective actions to address the apparent violations. At the conclusion of the meeting, the Regional Administrator requested that Duke submit to the staff the completion dates for the remaining corrective actions discussed at this meeting. Attachment 1 lists Duke's commitments regarding the remaining corrective actions and their associated completion dates.

In addition to addressing the apparent violations, Duke also described performance initiatives underway at Oconee Nuclear Station (ONS). Duke communicated the fact that the performance initiatives may change as assessments of Oconee are completed. Therefore, specific commitment dates for these performance initiatives are not provided in Attachment 1.

The Regional Administrator agreed to a proposal by Duke to hold bimonthly meetings between Duke and NRC management to discuss progress regarding the Oconee performance initiatives. Therefore, Duke intends to keep the staff informed of the scope and schedule regarding the Oconee performance initiatives through these bimonthly meetings.

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Please address any questions to J. E. Burchfield, Jr. at
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Very Truly Yours,



W. R. McCollum, Jr.
Site Vice President

Attachment

xc: L. A. Reyes, Regional Administrator
Region II

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

M. A. Scott, Senior Resident Inspector
Region II

James Lieberman, Director
Office of Enforcement

**Commitments from July 23, 1997
Predecisional Enforcement Conference**

Apparent Violation	Remaining Corrective Actions	Completion Date
97-07-01	Complete the assessment of other programmatic engineering commitments.	October 31, 1997
	The ISI Plan will be revised to include an entry for each nozzle "component", its inspection procedure number and the outage numbers in which the examination is to be performed. Duke will also submit supplemental information associated with Generic Letter 85-20.	September 1, 1997
	Develop specific RT and UT examination procedures for the HPI nozzle components.	September 1, 1997
	Assess the effectiveness of corrective actions regarding the revised HPI nozzle component examination program.	December 31, 1997
	Evaluate warming line flow and Operations procedures to minimize HPI nozzle component thermal stresses (refueling outage shutdown and startup data needed).	2 months after 1EOC18, 2EOC17, and 3EOC18 refueling outages
	Complete the assessment of approximately 1500 operating experience documents. Ongoing, evaluating approximately 40 documents per week.	April 30, 1998
	Complete near-term assessments to prioritize key areas for process improvements.	August 31, 1997
97-07-02	Collect temperature data that will be used to confirm the augmented inspection program for the HPI nozzles and injection lines (refueling outage shutdown and startup data needed).	2 months after 1EOC18, 2EOC17, and 3EOC18 refueling outages
	Collect temperature data that will be used to develop appropriate boundary conditions for thermal fatigue analyses (refueling outage shutdown and startup data needed).	2 months after 1EOC18, 2EOC17, and 3EOC18 refueling outages

**Commitments from July 23, 1997
Predecisional Enforcement Conference**

Apparent Violation	Remaining Corrective Actions	Completion Date
	Collect temperature data to modify plant operation to minimize the number of thermal cycles on the HPI lines (refueling outage shutdown and startup data needed).	2 months after 1EOC18, 2EOC17, and 3EOC18 refueling outages
	Develop the Engineering Support Program Document for nozzles.	December 15, 1997
	Submit supplemental information related to NRC Bulletin 88-08 (refueling outage shutdown and startup data needed).	March 1, 1998
	Replace the Oconee Unit 1 HPI check valves and piping from the safe-ends to the check valves (this modification has already been completed on Units 2 and 3).	Unit 1 EOC 17 refueling outage
	Perform video inspections of all HPI safe-ends and thermal sleeves on Oconee Unit 1.	Unit 1 EOC 17 refueling outage
	Complete the Class 1 fatigue analysis for the HPI System injection lines.	December 31, 1997
	Perform a design basis inspection of the LPI and HPI Systems.	December 31, 1997
97-08-01	Complete the HPI Reliability Study (reference June 4, 1997 Duke letter to the NRC).	December 31, 1997
	Perform a design basis inspection of the LPI and HPI Systems.	December 31, 1997
	Complete the assessment of approximately 1500 operating experience documents. Ongoing, evaluating approximately 40 documents per week.	April 30, 1998
97-08-02	Improve operator requalification training on procedure use and adherence. Initial training completed, ongoing training completion date is based on the 1997/1998 operator requalification training cycle.	May 31, 1998

**Commitments from July 23, 1997
Predecisional Enforcement Conference**

Apparent Violation	Remaining Corrective Actions	Completion Date
	Complete simulator training on loss of HPI suction events with an upgraded abnormal procedure. Training on plant response to loss of HPI suction events was provided shortly after the event. The completion date for the simulator training is based on the 1997/1998 operator requalification training cycle.	May 31, 1998
	Complete the benchmark and upgrade of additional abnormal procedures (APs). Six of 25 APs will be upgraded by December 31, 1997, all 25 APs will be upgraded by end of 1998.	December 31, 1998
	Complete an on-going assessment and upgrade of Operations procedures. Assessment will be completed by October 31, 1997. Schedule for upgrades of procedures is dependent on the results of the assessment.	October 31, 1997
	Improve techniques and standards for plant monitoring.	December 31, 1997
	Improve guidance, computer-based monitoring tools, and associated training for RCS inventory monitoring during startup and shutdown. Completion date is based on the software development time, procedure upgrades, and the 1997/1998 operator requalification training cycle.	May 31, 1998
97-08-03	Complete the assessment of approximately 1500 operating experience documents. Ongoing, evaluating approximately 40 documents per week.	April 30, 1998
	Revise work planning process to assure appropriate procedures are referenced. Effort involves updating approximately 1800 model work orders and retraining personnel.	December 1, 1997

**Commitments from July 23, 1997
Predecisional Enforcement Conference**

Apparent Violation	Remaining Corrective Actions	Completion Date
	Complete classroom training and management observations to emphasize management expectations regarding the use of mixed fittings and installation work practices for fittings. The schedule is based on completion of the Maintenance continuous training cycle.	December 31, 1997
97-08-04	Expand the root valve verification program to include critical root valves outside containment and/or where position is not self-revealing. The schedule is based on the large number of drawings to review, development of new procedures, and training of personnel.	March 31, 1998
	Complete classroom training and management observations to emphasize management expectations on proper control of instrument valve position. The schedule is based on completion of the Maintenance continuous training cycle.	December 31, 1997
	Based on the lessons learned from this event, Duke is taking the conservative step to voluntarily upgrade the LDST instrumentation to QA-1. The scope of the upgrade may be impacted by HPI Reliability Study and HPI/LPI Design Basis Inspections. The schedule reflects lead time for parts procurement and design engineering activities.	1EOC18, 2EOC17, and 3EOC17 refueling outages
97-08-05	Complete internal assessment of reportability guidance.	August 31, 1997