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 50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287
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 MCCOLLUM,W.R. Duke Power Co.
 RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to NRC 980318 ltr re violations noted in insp repts
 50-269/98-01,50-270/98-01 & 50-287/98-01,respectively.
 Corrective actions:communicated expectations to maint mgt &
 conducted duty training for welding discipline.

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April 17, 1998

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, -287/98-01
Reply to Notice of Violation

Gentlemen:

By letter dated March 18, 1998, the NRC issued a Notice of Violation as described in Inspection Report No. 50-269/98-01, 50-270/98-01, and 50-287/98-01.

Duke Energy Corporation (Duke) accepts the violation. As described in the attachment, Duke is proposing corrective actions to address the root cause of the violation.

Pursuant to the provisions of 10 CFR 2.201, the attachment provides a written response to the violation as identified in the subject Inspection Report.

Corrective actions in Section 3 of the response are the only regulatory commitments in this submittal.

Very truly yours,

W. R. McCollum, Jr.
Site Vice President
Oconee Nuclear Station

IEDIY

Attachment

9804210294 980417
PDR ADOCK 05000269
Q PDR

NRC Document Control Desk
April 17, 1998
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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 98-01-02

Restatement of violation 98-01-02

Technical Specification 6.4.1.e requires in part, that written procedures with appropriate instructions shall be provided for corrective maintenance which could affect nuclear safety.

Contrary to the above, as of January 31, 1998, Maintenance Procedure MP/0/A/1810/014, Valves and Piping - Welded - Removal and Replacement - Class A Through F, Revision 26, dated September 18, 1997, did not provide appropriate instructions for the use of purge paper, in that, the procedure did not contain adequate instructions or precautions to limit the length or amount of purge paper to be used as weld damming material to stop leakage. As a result, an excessive amount of purge paper was used on January 31, 1998, in support of welding a drain line connected to the Unit 1 pressurizer surge line. As the purge paper would not dissolve as intended during subsequent flushing (due, in part, to the excessive amount used), the drain line had to be cut to support retrieval of the purge paper.

This is a Severity Level IV violation.

RESPONSE:

Duke accepts the violation.

1. The reason for the violation:

This violation was the result of inadequate procedural guidance in the Maintenance welding procedure, MP/0/A/1810/014, to limit the length or amount of purge paper to be used as weld damming material to stop water leakage. The inadequate procedural guidance was caused by the failure of Oconee personnel to ensure adequate corrective actions were taken following the review of the operating experience data which was contained in Information Notice 93-63 and PIP 0-095-0200. Adequate corrective actions would have ensured that procedural restrictions existed regarding the length of purge paper plugs that was used as a water dam.

Background

As part of the repair of the one inch pressurizer drain line, a section of pipe was removed for testing. A new section of pipe was to be installed to complete the repair. A small amount of water was observed dripping from the one inch nozzle branching

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Reply to Notice of Violation (Reply)
Violation 98-01-02

from the bottom of the 10 inch piping. The line was allowed to drain for a period of time. The Operations group was contacted to ensure the line was isolated and to evaluate if any additional actions could be taken to stop the water. No additional actions were identified to stop the dripping water. Maintenance and Engineering reviewed options to deal with the water. The decision was made to use dissolvable purge paper as a dam to prevent water from affecting the weld. Exposure of the weld to water during the welding process would have resulted in an unacceptable weld quality. Using the existing procedure as the document governing the use of purge paper, the Maintenance technicians inserted two purge paper plugs into the one inch line to stop the water. The closure welds were made and the line was returned to the Operations group for flushing and functional testing. However, the pipe would not flush as planned. Subsequent actions were taken to determine why the purge paper would not flush and to develop a recovery plan.

2. The corrective steps that have been taken and the results achieved:
 - a) Communications have been made to Maintenance Management concerning this event and the expectations on the use of operating experience data.
 - b) Duty area training for the welding discipline was conducted on February 18 and 19 of 1998, which included the lessons learned from this event.
 - c) Maintenance procedure, MP/0/A/1800/014, has been revised to incorporate detailed instructions regarding the use of dissolvable purge paper used as purge gas or water dams. These changes specifically limit the length of purge paper used as weld damming material.
 - d) Additional training was completed March 1998 on procedure changes incorporating the limitations and guidelines for purge paper use.

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

A specific action plan or procedural guidance for resolving fluid isolation problems encountered by Maintenance during welding activities will be developed. This corrective action will be completed by August 1, 1998.

4. The date when full compliance will be achieved:

Duke is in full compliance.