

Duke Power Company
Oconee Nuclear Site
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DUKE POWER

November 4, 1993

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

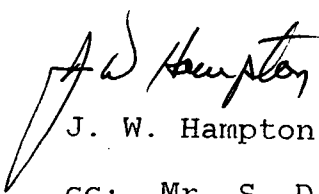
Subject: Oconee Nuclear Site
Docket Nos. 50-269, -270, -287
Inspection Report 50-269, -270, -287/93-22
Reply to Notice of Deviation -- REVISED --

Dear Sir:

By letter dated September 17, 1993 the NRC issued a Notice of Deviation as described in the subject report. On October 18, 1993, Duke Power Company (Duke) submitted a response to the deviation.

Following the October 18, 1993 submittal, the NRC Senior Residents Inspector requested that Duke review the planned corrective actions. After review of these actions, I am submitting a revised response to the subject deviation.

Very truly yours,


J. W. Hampton

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

Mr. L. A. Wiens, Project Manager
Office of Nuclear Reactor Regulation

Mr. P. E. Harmon
Senior Resident Inspector
Oconee Nuclear Site

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Deviation 269/93-22-02

By letter dated December 9, 1988, in response to NRC Violation 50-269,270,287/88-17-01, Duke Power Company committed to implement an annual calibration of the 125 VDC ground detection circuitry. This commitment is accomplished by procedure IP/O/B/3000/24.

Contrary to the above, the 125 VDC ground detection system on Unit 1 was not calibrated annually. The Unit 1 ground detection circuitry was scheduled to be calibrated in September 1992 with a grace period for calibration ending May 21, 1993. As of August 1993 the Unit 1 ground detection circuitry had still not been calibrated.

RESPONSE:

1. The reasons for the deviation:

The Unit 1 ground detection circuitry calibration was begun within the allowable time frame of the annual calibration schedule. While performing this calibration procedure it was found that it could not be completed in its entirety due to intermittent high impedance grounds that could not be located. This caused the ground alarm to be sealed in when, as defined by procedure, the bus was not grounded. Under the guidelines of the Oconee maintenance program, the calibration work order was placed on hold until the ground alarm could be cleared to allow completion of the procedure.

The fact that this calibration had been committed to be performed annually to the NRC was overlooked because no means had been established to identify this as a commitment item when the procedure and predefined work order were originated. Nuclear Site Directive 703.13 has since been written (07/30/93) which requires commitments to be identified within the procedure when procedures or procedure changes are written due to commitment items.

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

The ground detector relay has been calibrated and procedure IP/O/B/3000/24 completed on Unit 1.

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

It is recognized that ground detection equipment is important to maintaining a clean, reliable DC power system. Therefore, modifications to the ground detection circuitry and ground detection methods are being evaluated.

Procedures IP/O/A/3000/18, DC System Ground Detection, and IP/O/B/3000/24, 125 VDC Instrument and Control Battery System Trouble Alarms Calibration, will be changed as necessary to include compensatory actions for a sealed in ground alarm or inoperable alarm circuit. The procedure change to IP/O/B/3000/24 will also identify this calibration as an NRC commitment.

Annual calibration of the ground detection circuitry will continue. Should this calibration not be able to be completed due to equipment malfunctions or limitations, compensatory actions will be taken in lieu of this calibration until such time that it can be completed.

4. The date when corrective actions will be completed:

June 30, 1994