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AUTH.NAME AUTHOR AFFILIATION
HAMPTON,J.W. Duke Power Co.
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SUBJECT: Responds to NRC 941123 ltr re violation noted in insp rept 50-270/94-32.Corrective actions:IAE maint will revise procedure IP/0/A/0310/004B & evaluate procedure IP/0/A/3955/01.

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Duke Power Company
Oconee Nuclear Site
P.O. Box 1439
Seneca, SC 29679

J. W. HAMPTON
Vice President
(803)885-3499 Office
(803)885-3564 Fax

DUKE POWER

December 22, 1994

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

Subject: Oconee Nuclear Site
Docket No. 50-287
Inspection Report 50-269, -270, -287/94-32
Reply to Notice of Violation

Dear Sir:

By letter dated November 23, 1994 the NRC issued a Notice of Violation as described in Inspection Report No. 50-269/94-32, 50-270/94-32, and 50-287/94-32.

Pursuant to the provisions of 10 CFR 2.201, I am submitting a written response to the Violation identified in the subject Inspection Reports.

Very truly yours,

J. W. Hampton

Attachment

cc: Mr. S. D. Ebneter, 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

IE01
1/1

Attachment 1
Reply to Notice of Violation
Violation 270/94-32-01

RESPONSE:

1) *The reason for the violation, or if contested, the basis for disputing the violation*:

Duke Power Company acknowledges the violation with the following exception: it is noted in the NRC violation that example two occurred on 10/26/94. Duke Power's records indicate that this event occurred on 10/17/94.

Event 1:

On October 20, 1994, Instrument and Control Technicians (ICT) A and B of IAE Maintenance began calibrating the Engineered Safeguards (ES) System Analog Channel A Reactor Coolant Pressure Channel using procedure IP/0/A/0310/003B. ICT A was qualified to the procedure and ICT B was in the process of qualifying. Both technicians had previously been involved with performing this procedure. ICT A was reading the procedure and ICT B was performing the work. This calibration was completed successfully.

During the morning of October 21, 1994, the same technicians began calibrating the ES System Analog Channel B Reactor Coolant Pressure Channel using procedure IP/0/A/0310/004B. ICT B was reading the procedure and ICT A was performing the work. At various steps in the calibration procedure, it was necessary to connect to output jacks in the bottom of the channel A cabinet. After a lunch break the technicians performed step 10.6.3 to verify the recorder channel selection plug was plugged into jack J3 which is located in the bottom of channel A cabinet. This step requires independent verification. Step 10.7.2.i, a step with no sign off, connects the Digital Volt Meter to recorder output jack 1-7-J4 and records the as found readings. The procedure does not mention the jack is located in the channel A cabinet number 1. ICT A completed this step and recorded the meter readings.

At approximately 1320 hours, ICT B read step 10.7.3.a "Place Pressure Test Circuit in RANGE position." The procedure did not specify which channel or cabinet number. ICT A, still being positioned at the channel A cabinet, went to the channel A Buffer Amplifier and after touching the label to verify correct component switched the channel A pressure test circuit switch, causing the channel A to trip. Because channel B was in test, this satisfied the logic and actuated the ES systems. Only the ES components that were in service started.

Event 2:

On October 17, 1994, two Instrument and Control Technicians were performing a test on transducer 2ET42 in cabinet UCTC3 using procedure IP/0/A/3955/01, "AC Watt Transducer, Two Element." The technicians had performed this procedure several times during the day correctly. Procedure IP/0/A/3955/01 provides directions to test the ac watt transducer and has an enclosure to document the equipment taken out of service. The procedure requires that test equipment be connected to the circuits as shown on procedure enclosures. However, the procedure does not have sign offs with independent verifications (IV) for the procedure steps to help assure they are completed in sequence and completed correctly. Step 10.7.17 of IP/0/A/3955/01 removes the test equipment prior to restoring the plant equipment to service. The technicians failed to complete step 10.7.17 and remove the test leads. The technicians then proceeded to return the equipment to service as documented on enclosure 11.2. As a result, the test leads made a path to ground through the test equipment and resulted in blowing a fuse in the 2TE switchgear when the circuit was repowered. The test equipment used was different than what has been used in the past. The test equipment used in the past was configured such that a similar event would not have caused loss of plant equipment.

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

Event 1:

Training was provided to IAE personnel on October 24, 1994 to reinforce/communicate management expectations relating to procedure use and adherence.

The ES and RPS cabinets have been labeled so that the proper channel can be readily determined with the doors open.

Event 2:

The team leader and the technicians involved in this event reviewed the event and actions that can be taken to prevent recurrence (i.e. repeatback, placemarkers for procedure progress).

Attachment 1
Reply to Notice of Violation
Violation 270/94-32-01

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

Event 1:

IAE Maintenance will revise procedure IP/0/A/0310/004B to caution or instruct technicians when working in a different cabinet than the channel being calibrated. Also IAE Maintenance will identify any additional Engineered Safeguards (ES) and Reactor Protective System (RPS) instrument procedures that contain multiple tasks which require changing trains or cabinets and will revise the procedures as necessary.

Event 2:

IAE Maintenance will evaluate IP/0/A/3955/01 in accordance with NSD 703 "Administrative Instructions For Station Procedures" and Maintenance Directive 3.2.23 "Independent Verification for Mechanical and I&E Maintenance" to determine if it requires upgrading to add signoffs for procedure steps.

IAE Maintenance will evaluate the test equipment used to determine if it is the best for the application or whether modifications are required to minimize the risk of similar events.

4) ***The date when full compliance will be achieved:***

The procedures noted in item 3 above will be revised by 4/19/95.