

DUKE POWER COMPANY

CHARLOTTE, N. C. 28242

A. C. THIES
SENIOR VICE PRESIDENT
PRODUCTION AND TRANSMISSION

1 JUN 8 12:00
June 2, 1981

(704) 373-4249

Mr. James P. O'Reilly, Director
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Re: Oconee Nuclear Station
IE Inspection Report
50-269/81-07
50-270/81-07
50-287/81-07

Dear Sir:

Please find attached Duke Power Company's response to Violation Item B of the subject inspection report. Responses to the other items of non-compliance were previously submitted by my letter of May 26, 1981.

I declare under penalty of perjury that the statements set forth herein are true and correct to the best of my knowledge, executed on June 2, 1981.

Very truly yours,



A. C. Thies

FTP/djs
Attachment

8107080485 810618
PDR ADCK 05000269
Q PDR



Duke Power Company

Oconee Nuclear Station

Response to IE Inspection Report 50-269/81-07, -270/81-07, -287/81-07

Violation

- B. Technical Specification 4.1 specifies the frequency and type of surveillance to be applied to equipment for plant operation.

Contrary to the above, two monthly surveillance checks and one refueling surveillance calibration added to the Technical Specification by amendment, 92/92/89, effective January 28, 1981, were not performed on schedule.

This is a Severity Level V Violation (Supplement I.E.) and applies to Oconee Units 1, 2 and 3.

Response

- 1) Admission or denial of the alleged violation:

Duke concurs with the violation as stated.

- 2) Reasons for the violation or denial of the violation:

- a) The monthly surveillance checks for the Emergency Feedwater Flow Indicators and the PORV and Safety Valve Position Indicator were not performed as required by Technical Specification Table 4.1-1 due to a combination of administrative delay and personnel misunderstanding. Copies of the Technical Specification change were not received and appropriately distributed at the station until several weeks after the approval date of January 28, 1981. The Operations person in charge of scheduling the new surveillance checks erroneously assumed that the new requirements would not become effective until 20 days after the issuance date of the Technical Specification change. He added this period to the full 45 day period allowed for a monthly test and thus assumed that the checks did not have to be performed for up to 65 days after approval of the Technical Specification change.
- b) The failure to calibrate the Unit 3 PORV and Safety Valve Position Indicators was due to administrative deficiencies. Since there was no delayed implementation date requested or given for the affected Technical Specification change, the requirement for the refueling calibration was effective on January 28, 1981. The delay in station receipt of the new specification discussed above plus the time required to generate an approved calibration procedure resulted in the refueling outage for Unit 3 being over before the calibration could be performed. It should be noted that the position indicators were calibrated when first installed on all Oconee units according to the modification implementation procedures used. These initial calibrations were performed on February 23, September 15, and April 17, 1980 for Units 1, 2 and 3 respectively. The position indicator was functionally tested on Unit 3 on February 11, 1981 which indicated that the instrument was still correctly calibrated. The calibration involves verifying a threshold level on the instrument amplifier for indication of flow through the valve. This is not a fine adjustment that is likely to drift.

3) Corrective actions taken and results:

- a) The monthly surveillance checks were initially performed on March 17, 1981 for Units 1 and 3, and on March 31, 1981 for Unit 2. The checks are now being performed monthly on all units. The Operations person involved has been informed that unless specified otherwise, the effective date of any Technical Specification is the date of approval and issuance by the NRC. All appropriate station personnel have been instructed to schedule periodic surveillance within the specified frequency and not to use the maximum allowable interval except in extenuating circumstances.
- b) The permanent procedure for performing the refueling calibration was issued on March 26, 1981. It will be performed at the next opportunity on Unit 3.
- c) Administrative changes have been made to assure that any new or revised surveillance requirements are identified and scheduled by responsible personnel. This includes identification of surveillance requirements during station review of proposed Technical Specifications revisions, and requesting delayed effective dates of Technical Specification amendments from NRC where applicable.

4) Corrective actions to be taken to avoid further violations:

This is included in (3c) above.

5) Date when full compliance will be achieved:

Not applicable.