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 50-269 Oconee Nuclear Station, Unit 1, Duke Power Co. 05000269
 50-270 Oconee Nuclear Station, Unit 2, Duke Power Co. 05000270
 50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287

AUTH. NAME TUCKER, H.B. AUTHOR AFFILIATION Duke Power Co.
 RECIP. NAME RECIPIENT AFFILIATION Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 890717 ltr re violations noted in Insp Repts
 50-269/89-17, 50-270/89-17 & 50-287/89-17.

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DUKE POWER COMPANY

P.O. BOX 33189
CHARLOTTE, N.C. 28242

HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

TELEPHONE
(704) 373-4531

August 16, 1989

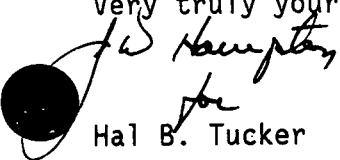
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Washington, DC 20555

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Inspection Report 50-269, -270, -287/89-17

Gentlemen:

By a NRC letter dated July 17, 1989 a notice of violation and Inspection Report 50-269, -270, and 287/89-17 was transmitted to me. As required by 10 CFR 2.201, I am submitting a written response to the violation identified in the inspection report.

Very truly yours,


Hal B. Tucker

RRE/76/td.

Attachment

cc: Mr. S. D. Ebnetter
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, NW, Suite 2900
Atlanta, GA 30323

Mr. P. H. Skinner
NRC Resident Inspector
Oconee Nuclear Station

Mr. D. B. Matthews
Office of Nuclear Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

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11

Violation (#269,270,287/89-17-01), Secerity Level (IV)

Oconee Nuclear Station Technical Specification (TS) 6.4.1 states that the station shall be operated and maintained in accordance with approved procedures and that these procedures shall contain appropriate check-off lists and instrcutures. Implicit in this statement is the requirement that these procedures will be adequate to prevent operation of equipment beyond conditions permitted by TS.

Contrary to the above, two operating procedures were not adequate, in that:

- A. Operating Procedure (OP) O/A/1107/03, 100 KV Power Supply contained steps which removed Emergency Power Switching Ligic (EPSL) Functional Unit 9 from service in violation of TS Table 3.7-1 (Operability Requirements for EPSL circuits). Placing the plant in this lineup caused the plant to be operated in an unanalyzed condition. This occurred during the period from January to June 1989. None of these periods exceeded 72 hours.
- B. Performance Test (PT) 2/A/061/01J, EPSL ES Actuation Keowee Emergency Power Start Test, required placing both supply breakers from Keowee to the Standby Bus in a condition that prevented automatic closure while the remaining Keowee unit was locked out. This resulted in a violation of TS 3.7.1(b) which requires two independent on-site emergency power paths to be operable. This condition removed all automatic emergency power restoration capabilities to essential loads on the two operating units. This condition has occurred during past refueling outages due to this procedure inadequacy.

This is a Secerity Level IV Violation.

Response to Violation Item A:

1. Admission to denial of the alleged violation:

Duke Power Company admits the violation.

2. Reason for Violation:

The procedure changes responsible for placing the plant in the unanalyzed condition were a result of voltage problems discovered with the Lee Gas Turbine emergency power source and potential voltage problems associated with using the Central Switchyard as an alternate power source. The procedure placed one train of breakers which provide power to the safety-related switchgear in Manual so that the Operator could manually sequence loads and maintain voltage integrity on his power source (Lee Gas Turbine or Central Switchyard). Due to

inadequate procedure review, it was not discovered that this electrical configuration also disabled the automatic capability of the redundant emergency power path for a specific design basis scenario (LOCA with a Loss of Offsite Power).

3. The corrective steps which have been taken and the results achieved:

The Operations procedure, OP/O/A/1107/03 (100 KV Power Supply) has been corrected to remove the deficiency. Also, the voltage problems associated with the Lee Gas Turbine and Central Switchyard have been resolved.

4. Corrective steps which will be taken to avoid further violations:

Procedures are being generated to remove and restore emergency power systems and components to service. These procedures shall be reviewed by the Duke Power Design Engineering Group prior to approval and use.

5. Date of full compliance:

Operations procedure OP/O/A/1107/03 (100 KV Power Supply) was revised to remove the deficiency. This was accomplished June 9, 1989. The emergency power system removal and restorations procedure will be in place by December 1, 1989.

Response to Violation Item B:

1. Admission or denial of the alleged violation:

Duke Power Company admits the violation.

2. Reason for violation:

Inadequacy of procedure reviewed to foresee the removal of both power paths from service, even for the short time required to actively transfer bus loads. This condition has existed since the procedure change and reissue in 1980. During the 1980 procedure change, SK breaker operation was changed based on the Operations procedure, therefore creating the currently discovered problem of power path inoperability.

3. The corrective steps which have been taken and the results achieved:

After discovery of the procedure inadequacy, procedure steps were performed out-of-sequence to preclude both paths being removed simultaneously by placing only one control switch in manual at a time. This provided either one breaker closed in Auto and the other breaker being opened in manual, then placed in Auto. Subsequently, the other breaker is placed in manual and opened; then both returned to Auto.

All effected procedures have been administratively removed from service, even though they are refueling outage frequency.

4. Corrective steps which will be taken to avoid further violations:

Operations, Performance and Design Engineering will review EPSL testing procedures to eliminate taking both SK breaker transfer switches to manual with both breakers open simultaneously.

5. Date of full compliance:

Implementation will commence with Unit 3 refueling outage currently scheduled for November, 1989. Each remaining unit will be revised, if necessary, and tested as their refueling outages occur. All three units will be completed prior to the restart of Unit 2 for cycle 12 (currently scheduled to be November 1990).