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SUBJECT: Clarifies position re exercise weaknesses noted in Insp
 Repts 50-269/89-29,50-270/89-29 & 50-287/89-29.

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February 2, 1990

U. S. Nuclear Regulatory Commission
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Washington, DC 20555

Subject: Oconee Nuclear Station, Units 1, 2 and 3
Docket Nos. 50-269, -270, -287
Inspection Report 50-269, -270, -287/89-29

Gentlemen:

Oconee Nuclear Station conducted its annual emergency exercise on September 27, 1989. This exercise which was observed by the NRC was the subject of NRC Inspection Report 50-269, -270, -287/89-29. The inspection report identified several Exercise Weaknesses and Inspector Followup Items. The purpose of this letter is to clarify our position concerning two exercise weaknesses and an inspector followup item as described in the inspection report.

Emergency preparedness is very important to Duke Power Company. Time, effort and resources have been expended to assure our program is of the highest caliber. For these reasons, I offer our position concerning this inspection report.

Accordingly, please find attached an explanation of our position in regard to IFI 50-269, -270, -287/89-29-01 and exercise weaknesses 50-269, -270, -287/89-29-04, 5.

Very truly yours,

Hal B. Tucker

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Attachment

Duke Power Company
Oconee Nuclear Station
Inspection Report 50-269, -270, -287/89-29

The Oconee Annual Exercise was a multi-casualty drill developed around the response to an earthquake with many problems being reported at the same time. Actual participation in the exercise included station personnel and NRC Region II with participation by Oconee County and Pickens County being limited to transmission of information by phone and facsimile. Data was supplied to the NRC via the Emergency Notification System and facsimile.

In addition to the main exercise conducted on September 27, 1989, a fire drill was conducted on September 26, 1989. This was also observed by the NRC staff and was included in the subject inspection report.

The Inspection Report 50-269, -270, -287/89-29 identified several exercise weaknesses and Inspector Followup Items. The following information is provided to clarify our position concerning certain exercise weaknesses and inspector followup items as described in the inspection report.

- Item 1. IFI 50-269, 270, 287/89-29-01 - Failure of the new administration building elevator to switch to a fire response mode.

Last paragraph of page 2 states:

"...The licensee committed to provide repair of the elevator and provide additional training to the fire brigade and demonstrate the corrective actions during a February 1990 drill."

Clarification 1:

The IFI identified above together with the excerpts quoted from the inspection report are not correctly stated. The elevator in the new administration building at the time of the annual exercise was programmed to switch to a fire response mode for smoke detection in the lobby area on each of the seven floors; it was not designed to go to a fire response mode based on smoke detection in areas other than the lobby. Training was made available to fire brigade and MERT (Medical Emergency Response Team) members by giving them actual experience with the fire response mode of operation for the elevators in the Oconee Office Building.

During the critique for the fire drill held on September 26, 1989 station management committed to a repeat drill by Shift A; a commitment for demonstration of the corrective actions during a February 1990 drill was not made. A subsequent drill was held on November 4, 1989 for Shift A utilizing the same incident response fire commander. Concerns identified by the NRC inspector were corrected and have been documented with training records and a drill critique summary. The fire alarm computer has been reprogrammed to bring the elevator to the first floor anytime it detects fire anywhere in the Oconee Office Building. Our action on this item is considered complete.

Item 2: Exercise Weakness 50-269, 270, 287/89-29-04: Failure to make a timely emergency classification.

Item 6 on page 4 of the report states:

"A team was dispatched to retrieve the seismic scratch plates from the tendon gallery. When the site assembly siren sounded this team responded to the call for accountability. After the site accountability was accomplished some 30 minutes later the team assigned to retrieve the scratch plate was redeployed to other jobs. The need for this information and the retrieval status apparently was lost in information transfer during turnover from the Simulator Shift Control Room Supervisor to the TSC Director. This caused a significant delay in retrieval of important seismic data which would have upgraded the event to a Site Area Emergency. In response to the Seismic Trigger statalarm and procedure AP/1/A/1700/05 (Earthquake) and AP/2/A/1700/05 (Earthquake) the shift supervisor tasked I&E to obtain and analyze the tendon gallery peak acceleration recorder and strong motion accelerometer (SMN-3), I&E was given the assignment seven minutes after the Earthquake occurred. The scratch plate analysis was not completed until approximately 2 hours and 15 minutes after the seismic event.

This delay in classification to a Site Area Emergency was identified as an exercise weakness. The licensee committed to provide training and demonstrate corrective actions at a February 1990 drill."

Clarification 2:

We do not agree that the exercise indicated a weakness in this area. As soon as the Emergency Coordinator received the necessary information to determine that he had met the action level as identified in the classification procedure for a Site Area Emergency, it was promptly declared. A decision was made by the TSC to delay securing the seismic scratch plates and tapes until plant status could be understood and reports had been received from the damage assessment teams. Limited manpower was available in the Operational Support Center early in the event so priorities were established by TSC management. The Technical Support Center handled the simulated emergency aggressively. At no time would the public health and safety have been compromised. No indications were immediately apparent that site area emergency action level conditions existed.

Item 3: Exercise Weakness 50-260, 270, 287/89-29-05: Failure to make timely offsite notifications at the Alert classification.

Item 7 on page 5 of the report states in part that:

"An inspector observed that the Alert notification exceeded the 15 minutes time criteria. The selective signal system in the simulator control room was believed to be inoperable. The communicator stated that he could not obtain an outside line for direct dialing when trying to use the alternate telephone. The communicator then requested the plant switchboard operator to initiate the call. The operator could not reach county or State response centers. The notification message was finally transmitted by the Unit 1 control room by radio to the counties. The state was in turn notified by one of the counties. As a result the notification for the Alert, communication took approximately 21 minutes longer than the 15 minutes criteria (a total of 36 minutes). The telephone systems at the simulator do not mimic these used in the plant. Different instructions are needed to make notification calls. The Site Area Emergency notification from the TSC was accomplished within the 15 minutes criteria.

The failure to notify within 15 minutes at the Alert classification was identified as an exercise weakness. The licensee committed to demonstrate timely notifications of offsite agencies at a future drill."

Clarification 3:

We believe that the problem identified in the report was drill specific and was not reflective of our true ability to notify offsite agencies within 15 minutes from the station control room which is required by our Emergency Plan. We believe weakness 89-29-05 meets the criteria for an inspector follow-up item since our communicators were not using the actual primary communications equipment as described in the Oconee Emergency Plan. Oconee uses the Training Simulator to drive the emergency scenarios for drills and the annual exercise. Several enhancements to communications equipment at the simulator have been installed since the annual exercise.

A drill was held on November 7, 1989 as part of the normal emergency plan program. NRC Region II was unable to provide an inspector to review the corrective measures taken. All drill acceptance criteria was met.

Emergency Preparedness is very important to Duke Power Company. Time, effort and resources have been expended to assure our program is of the highest caliber. For these reasons, we offer our position concerning this inspection report.