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 50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287

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SUBJECT: Responds to NRC 900117 ltr re violations noted in Insp Repts
 50-269/89-36,50-270/89-36 & 50-287/89-36.Corrective actions:

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HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

February 16, 1990

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Inspection Report 50-269, -270, -287/89-36

By letter dated January 17, 1990 the NRC transmitted the subject Notice of Violation. Pursuant to 10 CFR 2.201, please find attached my response.

With regard to the inservice inspection program at Duke Power Company's nuclear stations, I would like to take this opportunity to request a meeting with NRC Region II management and staff. The purpose of this meeting would be to present the Duke ISI program including the aspects of regulatory requirements and plant safety. The objective of this meeting is to clear up any potential misconceptions concerning the ISI programs. For meeting arrangements, please contact my staff through normal licensing channels.

Very truly yours,

H. B. Tucker
H. B. Tucker

PJN99/td

Attachment

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Duke Power Company
Oconee Nuclear Station
Response to a Notice of Violation
50-269, -270, -287/88-37

Violation

During the Nuclear Regulatory Commission (NRC) inspection conducted on November 27 - December 1, 1989, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989), the violation is listed below:

10 CFR 50, Appendix B, Criterion II, requires in-part that the quality assurance program shall provide control over activities affecting the quality of the identified structures, systems, and components to the extent consistent with their importance to safety. Duke Power Company Quality Assurance Procedure QA-513, Revision 6, entitled "Control of Inservice Inspection Plans and Reports," paragraph 5.0 states, in-part, that each plan shall include a detailed listing of welds or components to be examined including their classification, category, item number, examination procedure and the calibration standard to be used. Paragraph 5.6 of the Quality Assurance procedure also states in-part that the quality assurance engineer shall review each inservice inspection plan for conformance to the ASME Section XI code.

Contrary to the above, on November 28, 1989 the inspector observed that Oconee's Unit 3 inservice inspection plan for second period of the second interval was not in conformance with the ASME Section XI Code in that it listed a calibration block (#40367) for the examination of item number B05.050.102, weld No. 3PSP-1 which had a surface finish not representative of the surface of the pipe to be examined in that, surface cracks and material surface separations were observed on the calibration block. In addition, the calibration block was not the same nominal diameter or nominal thickness as the pipe to be examined and did not have a notch calibration reflector all of which is required by ASME Section XI, Appendix III and Supplement 7.

This is a Severity Level IV violation (Supplement I).

Response to NRC Violation 50-287/89-37-02

(1) Admission or denial of the violation:

Duke Power Company admits the above referenced violation.

(2) Reason for the violation:

Calibration Standard 40367 was incorrectly specified for weld 3PSP-1, and this error was not discovered during review of the ISI Plan.

The violation states that Calibration Standard 40367 was not the proper standard for weld 3PSP-1 in that the standard contained "surface cracks and material surface separations." The standard has been inspected visually, and a cross-section has been metallographically examined. Minor processing laps were found, but no cracks were observed. The laps would have minimal effect on the ultrasonic examination, and in any case would, at worst, cause an increase in examination sensitivity.

The violation states that the calibration standard was not the same nominal diameter or thickness as the pipe to be examined, and did not have a notch calibration reflector. This standard did not conform to the requirements referenced in the ultrasonic examination procedure ISI-120 Revision 25. In this respect the calibration standard specified by the ISI Plan was in violation of the requirements of Duke Power's QA program.

Weld 3PSP-1 was inspected during the first ten-year inspection interval in accordance with the 1974 Edition, Summer 1978 Addenda of ASME Section XI. Calibration Standard 40367 was correctly specified in the first interval for this weld. The same calibration standard was incorrectly specified for the second interval inspection of this weld.

Quality Assurance Procedure QA-513 includes a process for making changes and corrections to the ISI Plan. This process is used to amend the ISI Plan in response to plant modifications, maintenance activities, industry or regulatory concerns, and new technology as well as the correction of errors found in the ISI Plan. During calibration for weld 3PSP-1, in the presence of the NRC Region II inspector, the UT inspector observed that Calibration Standard 40367 did not meet the requirements of Procedure ISI-120. He then initiated actions to review the calibration standard design and correct the ISI Plan or the procedure.

(3) Corrective steps taken and results achieved:

This error has been corrected in accordance with Quality Assurance Procedure QA-513.

The remaining items in the Oconee 3 Second Ten-Year Interval ISI Plan were reviewed for proper application of program requirements in the selection of ultrasonic calibration standards. No other items were found to specify improper calibration standards. In addition, the ISI Plans for Oconee 1 & 2, McGuire 1 & 2, and Catawba 1 & 2 were reviewed for proper calibration standard selection. Calibration Standard 40367 was specified for weld 1PSP-1 in the Oconee 1 ISI Plan, and for weld 2PSP-1 in the Oconee 2 ISI Plan. These welds correspond to 3PSP-1 in Oconee 3. No other items were found to specify improper calibration standards.

(4) Corrective steps which will be taken to avoid future violations:

We feel that this violation has no safety significance since no incorrect examinations were performed, and the ultrasonic inspector took the proper actions to correct the calibration standard discrepancy. Our review of the ISI Plans concluded that the ISI Plans and the program for writing, maintaining, and reviewing the ISI Plan are adequate, and that this was an isolated incident and not indicative of a deficiency in the program.

No further corrective actions will be taken.

(5) Date when full compliance will be achieved:

Full compliance was achieved on December 15, 1989.