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SUBJECT: Forwards Rev 1 to util 900126 response to violations noted in Insp Repts 50-269/89-31,50-270/89-31 & 50-287/89-31.

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February 14, 1990

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Inspection Report 50-269, -270, -287/89-31

Gentlemen:

By a letter dated January 26, 1990, pursuant to 10CFR2.201 I provided a response to the subject notice of violation. Please find attached revision 1 to the response. This revision includes discussion of an additional corrective action, previously committed to in LER 269/89-15.

Very truly yours,

H. B. Tucker

H. B. Tucker

PJN95/td

cc: Mr. S. D. Ebneter
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Violation

Oconee Nuclear Station Technical Specifications (TS) 4.4.1 identifies the required testing associated with containment penetration integrity. Included in this specification is the specific requirement to perform local leak rate testing or integrated leak rate testing, as applicable, following any major modification or replacement of a component affecting the integrity of containment. Implicit in this statement is the requirement to perform testing following maintenance to components affecting containment integrity.

Contrary to the above, on September 22, 1989, the licensee identified that subsequent to the most recent Integrated Leak Rate Testing of each unit's containment, maintenance and modifications had been performed on several penetrations without performing the specified testing. This failure to perform the required testing was associated with four specific penetrations on all three units.

Response

1. Admission or detail of alleged violation:

   Duke Power admits the violation.

2. Reason for the violation:

   The contributing factors that led to the violation were:

   a. Personnel involved in making testing determinations, misunderstood the post modification/maintenance leak testing requirements for penetrations which Technical Specifications requires a Type A test but stated that a Type C test is not required.

   b. Post modification/maintenance testing requirements are listed in two manuals, which are under the control of different groups. The manual used for determining testing requirements for work requests did not include all the valves included in the IST manual.

3. The corrective steps taken and the results achieved:

   a. Penetration #53, and affected valves on other penetrations were declared inoperable. The outside containment boundaries on affected penetrations were verified isolated and administrative controls were instituted to assure that they remain so.

   b. Unit 1 and Unit 2, penetration #53 was modified to allow Type C testing and a successful test was conducted.

   c. Valves 1N-131 and 1CA-29 (penetration #39) and 1CF-3 and 1CF-4 (penetration #59) were successfully Type C tested.

   d. Unit 2, penetration #39 was modified to allow Type C testing and a successful test was conducted.

e. Unit 3 penetrations were tested using a Containment Integrated Leak Rate Test during a refueling outage in December 1989. The results of the test were satisfactory.

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

a. Inservice Testing Manual will be used to plan all Containment Isolation valve work for determination of post modification/maintenance Code testing.

b. Personnel involved in the determination of leak rate testing will be trained/qualified in the requirements of Technical Specifications.

c. Units 1 and 2 will have the Containment Integrated Leak Rate Test performed during the next scheduled refueling outage.

d. The entire containment leak testing program will be reviewed against current interpretations of requirements to verify that all requirements are either met or have approved exemptions. Further, approved exemptions will also be reviewed for validity.

5. Date of full compliance:

Full compliance will be achieved prior to startup from U2EOC11 refueling outage.