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SUBJECT: Responds to NRC 900411 ltr re violations noted in Insp Repts 50-269/90-08,50-270/90-08 & 50-287/90-08.

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DUKE POWER

May 10, 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, -287/90-08

Dear Sir:

By a letter dated April 11, 1990, the NRC had issued a notice of violation and 50-269, -270, -287/90-08 inspection report. Pursuant to the provisions of 10 CFR 2.201, I am submitting a written response to the violation identified in the inspection report.

Very truly yours,

Hal B. Tucker MJS

H. B. Tucker

PFG95/lcs

cc: Mr. S. D. Ebneter
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VIOLATION (#50-269, 270, 287/90-08-01, SEVERITY LEVEL IV)

Section XVI of Appendix B to 10 CFR 50, Corrective Action, requires that measures be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to these requirements, corrective actions were inadequate to preclude Reactor Building Cooling Unit inoperability due to heat transfer surface fouling. On February 20, 1990, the Unit 3 Reactor Building Cooling Units were identified as inoperable due to fouling. These same units had been previously rendered inoperable by fouling on several occasions, specifically in early 1987, in August of 1988, and in January of 1989.

RESPONSE:

1. Admission or Denial of the Violation:

   The Oconee Nuclear Station Performance Section admits the violation as stated.

2. Reason for the Violation:

   The RBCU Monitoring Program was inadequate to detect the accelerated fouling on Oconee Unit 3 that occurred prior to testing on February 20, 1990. Management involvement was insufficient to assure the correct responses to the monitoring data and to assure that all possible parameters were being utilized for monitoring purposes.

3. The Corrective Steps Which Have Been Taken and the Results Achieved:

   Immediate

   a. The "3C" Reactor Building Cooling Unit (RBCU) was declared inoperable, removed from service for cleaning, and placed back into operation following evaluation to ensure effectiveness of the cleaning.

   b. The "3B" RBCU train was placed in service.

   Subsequent

   a. The "3A" and "3C" RBCU's were cleaned and tested.

   b. The parameters used to monitor RBCU thermal performance were revised and a trending program put in place.

VIOLATION (#50-269, 270, 287/90-08-01, SEVERITY LEVEL IV) (Cont.)

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

A. The RBCU Monitoring Program will be formalized as a section in the Performance Manual to define the monitoring process.

B. The Performance Section will complete the revision of the procedure used to gather data for RBCU operability evaluations. The procedure will be used as the mechanism to control the Monitoring Process and will include:

1. Method for gathering data.
2. Data transmittal to Design Engineering for evaluation.
3. Notification of the RBCU operability status to appropriate station personnel.
4. Limits and actions to be taken based on operability margin.

C. The RBCU Task Force will be reactivated to pursue a solution to RBCU fouling problems, and seek methods to locate the source of fouling. The Task Force will disband when its mission is complete and will notify the affected Station Superintendents by letter. The Task Force will oversee the following activities:

1. The Nuclear Performance Evaluation section will investigate the feasibility of an on-line spray system to prevent fouling of the air side of the RBCU coils.

2. Design Engineering will investigate the feasibility of performing an engineering evaluation that shows that normal service induced fouling that occurs during 1 refueling cycle does not prevent the RBCU's from performing their intended safety function.

3. The Task Force will investigate reducing the opportunity for fouling by limiting the LPSW flow to the RBCU's.

4. The Maintenance Group will develop and be ready to implement a plan to search for RCS leakage source during unit trips and outages.

5. Date of Full Compliance:

Corrective Action (A.) will be completed 12/30/90.
Corrective Action (B.) will be completed 09/30/90.
Corrective Action (C.) will be completed at U-3 EOC13.