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

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SUBJECT: Responds to NRC 900619 ltr re violations noted in Insp Repts
 50-269/90-12,50-270/90-12 & 50-287/90-12.

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Hal B. Tucker
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DUKE POWER

July 19, 1990

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Inspection Report 50-269, -270, -287/90-12

Dear Sir:

By a letter dated June 19, 1990, the NRC issued Inspection Report 50-269,270,287/90-12 and a notice of violation. Pursuant to the provisions of 10 CFR 2.201, I am submitting a written response to the violation identified in Inspection report 50-269,270,287/90-12.

Further, your letter identified additional concerns about our program in coordinating the activities between Design Engineering Department, the Transmission Department and Oconee Nuclear Station. Your letter requested that our response discuss the particular actions taken or planned to improve the effectiveness of our coordination program. A response to this request is still in preparation. I will submit a response to this item by no later than August 2, 1990.

Very truly yours,

Hal B. Tucker
rsp90-12/pfg

xc: Mr S. D. Ebnetter
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VIOLATION (#90-12-01), SEVERITY LEVEL (IV)

10 CFR 50 Appendix B Criterion III, Design Control, requires measures to be established to assure that design basis requirements are correctly translated into procedures and instructions.

Contrary to the above, between February 1980 to March 1985, requirements were not correctly translated into procedures in that PT/O/A/4980/27A, Routine Test Procedure: Westinghouse CV-7 Relay, required adjusting undervoltage relays for the Auxiliary and Startup Transformer breakers such that during certain grid voltage conditions an inadequate voltage could be applied to safety-related components. This resulted in a condition that would have caused systems designed to prevent or mitigate a serious safety event not being able to perform their intended safety functions.

RESPONSE:

1. Admission or denial of the violation:

Duke Power Company admits the violation.

2. Reason for the violation:

At the time of the commitment, several letters between Design Engineering and Transmission documented the need for the change. Due to the lack of a controlled program the relay settings were not changed at that time.

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

The settings for 44 safety significant overcurrent relays were compared to settings used in Design Engineering calculations and no discrepancies were found. In addition, approximately 90% of other safety-related protective relay settings were reviewed to determine if the settings complied with Design Engineering criteria. No problems were found as a result of the review.

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

A relay setting control program will be implemented. This program will consist of controlled documents listing all safety-related protective relay settings. After this program is in place all safety-related protective relay setting changes will involve a change to these controlled documents as part of either a Nuclear Station Modification (NSM) or an Exempt Change. These two processes are controlled by existing Design Engineering, Station and Quality Assurance procedures. Both the NSM and Exempt Change processes give feedback to Design Engineering after the changes have been implemented and will serve as confirmation of the changes.

5. Date of full compliance: January 1, 1991