

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9101140188 DOC. DATE: 91/01/09 NOTARIZED: NO DOCKET #
 FACIL: 50-269 Oconee Nuclear Station, Unit 1, Duke Power Co. 05000269
 50-270 Oconee Nuclear Station, Unit 2, Duke Power Co. 05000270
 50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287

AUTH. NAME TUCKMAN, M.S. AUTHOR AFFILIATION Duke Power Co.
 RECIP. NAME RECIP. AFFILIATION Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 901218 ltr re violations noted in Insp Repts
 50-269/90-33, 50-270/90-33 & 50-287/90-33. Corrective actions:
 flow band changed to reflect plus or minus 1.5% tolerance &
 all pump testing procedures reviewed re allowed tolerances.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 3
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD2-3 PD	1 1	WIENS, L	1 1
INTERNAL:	ACRS	2 2	AEOD	1 1
	AEOD/DEIIB	1 1	AEOD/TPAB	1 1
	DEDRO	1 1	NRR MORISSEAU, D	1 1
	NRR SHANKMAN, S	1 1	NRR/DLPQ/LPEB10	1 1
	NRR/DOEA/OEAB	1 1	NRR/DREP/PEPB9D	1 1
	NRR/DRIS/DIR	1 1	NRR/DST/DIR 8E2	1 1
	NRR/PMAS/ILRB12	1 1	NUDOCS-ABSTRACT	1 1
	OE DIR	1 1	OGC/HDS2	1 1
	REG FILE 02	1 1	RGN2 FILE 01	1 1
EXTERNAL:	EG&G/BRYCE, J.H.	1 1	NRC PDR	1 1
	NSIC	1 1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 24 ENCL 24

Duke Power Company
Nuclear Production Dept.
PO Box 1007
Charlotte, NC 28201-1007

M.S. TUCKMAN
Vice President
Nuclear Operations
(704) 375-3851



DUKE POWER

January 9, 1991

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, -287/90-33

Gentlemen:

By a NRC letter dated December 18, 1990 a notice of Violation and Inspection Report 50-269, -270, and 287/90-33 was transmitted to me. As required by 10 CFR 2.201, I am submitting a written response to the violations identified in the inspection report.

Very truly yours,

M. S. Tuckman

RRE181/td

Attachment

cc: Mr. S. D. Ebner
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, NW, Suite 2900
Atlanta, GA 30323

Mr. P. H. Skinner
NRC Resident Inspector
Oconee Nuclear Station

Mr. D. B. Matthews
Office of Nuclear Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

9101140188 910109
PDR ADOCK 05000269
Q PDR

IE01
1/1

VIOLATION (#270/90-33-01), SEVERITY LEVEL (IV)

- A. Technical Specification 6.4.1 requires that the station be operated and maintained in accordance with approved procedures.

Contrary to the above, Unit 2 was not operated and maintained in accordance with approved procedures in that, on November 1, 1990, the turbine driven emergency feedwater pump minimum flow recirculation orifice block valve, 2FDW-89, was found locked closed contrary to the requirements of OP/2/A/1106/06, Emergency Feedwater System, which specifies that the valve is required to be locked open.

RESPONSE:

1. Reason for the violation:

The violation occurred because of the following reasons:

- a. The procedure was not carried to the field to perform the job.
- b. Lack of attention to detail resulted in the procedure being signed-off with the valve in the wrong position.
- c. Inadequate communications to both persons performing the job resulted in the misaligned valve.

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

The operators involved in this incident have been counseled. The counseling session included stressing good work practices and department policies on procedure adherence, communications, and attention to detail.

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

Operations management will hold conferences with all senior reactor operators, reactors operators and the non-licensed operators to stress the importance of plant configuration control. The Operations Management Procedures will be discussed with each operator along with management's expectations of operators to adhere to procedures and good operating practices.

4. Date of full compliance:

All identified corrective actions will be complete by March 31, 1991.

VIOLATION (#269/90-33-01), SEVERITY LEVEL (IV)

- B. Technical Specification 6.4.1 requires that the station be operated and maintained in accordance with approved procedures and that the procedures contain appropriate check off lists and instructions.

Contrary to the above, PT/1/A/0204/07, Reactor Building Spray System Performance Test, did not contain appropriate instructions in that, the referenced flow band for performing the test on Reactor Building Spray Pump 1A exceeded the licensee's criteria for establishing required flow bands when performing ASME Section XI pump testing.

RESPONSE:

1. Reason for the violation:

The flowband was set at $\pm 3\%$ to reflect the instrument tolerance allowed during instrument calibration. The instrument tolerance band was changed to $\pm 1.5\%$ to meet code requirements of $\pm 2\%$. After the instrument tolerance was changed, the corresponding flow band in the pump test procedure should have been changed but it was not. Therefore, the band in the procedure did not reflect actual instrument tolerances or code requirements.

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

The flow band has been changed to reflect a $\pm 1.5\%$ tolerance which is consistent with the instrument calibration tolerance and within code requirements. All six Reactor Building Spray pumps had their procedures changed to reflect the correct flow band tolerance and were approved on December 20, 1990.

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

All pump testing procedures are being reviewed to verify that allowed tolerances are consistent with instrument calibration tolerances and within ASME Section XI code requirements.

4. Date of full compliance:

The procedures will be reviewed for compliance by April 1, 1991. In the interim, all pump test procedure acceptance criteria is to be evaluated by the Test Engineer if the code review has not been completed.