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SUBJECT: Forwards comments & addl info re SALP Repts 50-269/89-01,
50-270/89-01 & 50-287/89-01.

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DUKE POWER

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May 19, 1989

Mr. Stewart D. Ebnetter
Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta Street, N.W. Suite 2900
Atlanta, Georgia 30323

Subject: Oconee Nuclear Station
Docket NOS. 50-269, -270, -287
Inspection Report 50-269, -270, -287/89-01
Systematic Assessment of Licensee Performance (SALP)

Dear Sir:

By a letter dated April 11, 1989 you transmitted to me the NRC Systematic Assessment of Licensee Performance (SALP) for the Oconee facility. In a public meeting on April 21, 1989 at the Oconee site a verbal presentation of that report was given. Although I am generally pleased with the report and felt it adequately reflected our performance over the period, I would like to comment on two areas of the report to provide additional information and to request that the NRC reconsider the ratings specified in these areas. The two areas are; 1) maintenance/surveillance and the 2) security categories. Attachment 1 and 2 to my letter provides our comments and additional information to the two areas respectively.

Should you have any questions concerning the information provided, please don't hesitate to contact myself or members of my staff.

Very truly yours,

Hal B. Tucker

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

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

Mr. D. B. Matthews
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Duke Power Company
Oconee Nuclear Station
Attachment 1

MAINTENANCE/SURVEILLANCE

We are disappointed in the SALP rating and the language in your report indicating that our performance has declined in the Maintenance/Surveillance category. It has been our perception that our performance, although not perfect, has continued to improve from the last SALP period and through the current period. Our definition of the expectations of a quality program for the Maintenance/Surveillance category are as follows:

- a) Maintain the condition of components critical to the operability of the station to allow them to perform their intended functions.
- b) Perform surveillance during the cycle to provide a high degree of assurance that components are functioning correctly and will perform their intended function if called upon.
- c) Adopt a 'fix before break' philosophy, which will allow plant operators to be in full control of a predictable plant, thus minimizing the potential for adverse consequences to the plant and the public and to maximize the efficiency and reliability of the station.
- d) The performance of this work will be planned and executed to minimize errors by personnel and radiation exposure to them.

In the SALP report it is stated that some of the key evaluation criteria used for assessment were as follows:

1. Assurance of quality, including management involvement and control;
2. Approach to the resolution of technical issues from a safety standpoint;
3. Responsiveness to NRC initiatives;
4. Enforcement history;
5. Operational and construction events;
6. Staffing (including management);
7. Effectiveness of training and qualifications program

We do understand that you are not limited to this criteria and others may be used where appropriate. In the case of Maintenance, it would seem appropriate to look at capacity factors, length of continuous runs, trips, and forced outage rate as a gross indicator of your performance in the Maintenance area.

In the following paragraphs, we offer additional information which has led us to a perception of improved performance.

During the SALP period of August 1, 1987 to January 31, 1989 the Oconee Nuclear Facility operated with a high degree of reliability. We conducted 4 refueling outages with high quality. Indicators of the quality of work performed is summarized in the following statistics:

- The three units achieved a capacity factor of 83.06% during the period, one of the highest for a multi unit facility in the U.S.
- The three units achieved a low forced outage rate of only 2.41% during the period. Almost none of the forced outage rate is reflective of conditions which a prudent maintenance program would have avoided.
- Units 1 and 3 achieved their longest continuous runs in their 15 year history of 235 and 351 days respectively.
- Reactor trips and Safety Injections were below industry average during the evaluation period. This obviously minimizes challenges to safety systems.
- Outage execution has been excellent. During the first two outages in the period the steam generators were chemically cleaned and averaged approximately 68 days each. The second two outages were conducted in 43 and 42 days respectively - among the best in our history.

The above performance could not be achieved without an effective maintenance/surveillance program.

The material condition and housekeeping have consistently improved since the last SALP period. We do recognize that we have a long way to go to meet our standards, however the following achievements are noteworthy:

- The Maintenance Engineering support for facility and equipment upgrade has been strengthened and is providing improved attention to component reliability.
- The physical plant appearance and cleanliness has improved drastically during the period.
- The plant contaminated areas have been significantly reduced.

The planning of work has improved significantly during the period as indicated by the following:

- The amount of backlogged work has decreased significantly to only 250 non-outage work requests outstanding longer than 90 days for a 3 unit facility.
- The preventative to corrective maintenance ratio has been improved and is approaching our goal of 70%.
- Extensive improvement in ALARA planning has resulted in 1988 having the lowest station exposure since 1975. The Unit 1 refueling in 1989 had the lowest exposure of any outage in our history.

- Attention to detail on work request quality has improved during the period.

We have been very responsive to industry and NRC initiatives in the Maintenance/Surveillance area as indicated by the following:

- Oconee is one of the few plants in the U.S. that has a large dedicated engineering resource in the maintenance department able to work directly with craft personnel to improve reliability of components.
- 779 Limitorque valve motor operators (safety and non-safety) at the Station have been rebuilt and Movat tested where appropriate. This action has taken place since the 1986 SSFI inspection.
- Oconee has been the industry leader in identification and resolution of problems with air to water heat exchangers (Reactor Building Cooling Units).
- Our erosion and corrosion testing program for pipe wall thinning was established before the NRC initiatives.
- Our containment leak rates in Type A and C testing has continued to improve and was the best in our history in recent outages.
- Many of the B&W Owners Group SPIP recommendations have been implemented and these have been directly responsible for trip reduction.
- NRC identified issues have been aggressively pursued and we have received praise from inspectors on our thoroughness and responsiveness.

In analyzing the SALP report, it appeared that a great deal of emphasis was given to the increased number of violations from last period to this period. Although we are not disputing the validity of these violations, it should be recognized that there were more team inspections - Environmental Qualification, Quality Verification, Maintenance Team - that contributed to inspector hours in the maintenance area. The following is our analysis of the data you presented in the SALP report:

Three violations were significant during the period:

- Violation 87-51 resulted in loss of a freeze seal. We disagree that the procedure was at fault; however, we have taken actions to reduce the probability of this event. This was very early in the period.
- Violation 88-08 Inadequate equipment identification of a component prior to beginning work. We feel that we have a very low number of wrong unit, wrong train events. As a practice we had not labeled instrument root valves at Oconee. As a result of this event, we are labeling all instrument root valves at the plant.
- A violation not cited during this period, but covered in the report dealt with RBCU drop out plates. We feel this was a strength of our surveillance program in identifying that no pre-op test had been

performed on this component and developing plans to do testing identified the inadequacy of the design.

The Environmental Qualification inspection identified the following violations:

- Violation 88-03 Design documentation not adequate for Victoreen high range radiation monitors. This was not related to maintenance.
- Violation 88-03 Level V Reactor Building level transmitter not being maintained completely filled with oil and therefore not in a tested configuration. This was an error in capturing the requirements of the EQRI several years earlier.
- Violation 88-03 Level V deficient EQ maintenance procedures in that requirements not properly captured from EQRI. This involved 3 components, one of which was the above violation, and none of any significance.

The Quality Verification Team inspection identified the following violations:

- Violation 88-13 Failure to keep accurate records. This was not a record keeping problem but rather a falsification of documents problem. Individuals involved have been disciplined and other actions taken. This was not a Maintenance/Surveillance problem.
- Violation 88-13 Failure to measure valve stroke time from actuation to end of actuation. Oconee used the same guidance that was approved for the Catawba SER which allowed light to light measurement.
- Violation 88-13 Failure to include valves LPSW-773 and HP-98 in IST program. Valve LPSW-773 was not included and is not necessary. HP-98 was the only valve in 3 unit's programs that had not been included that should have been. A very low error rate.
- Violation 88-13 Failure to correctly fill out work requests and inadequate cleanliness of cabinets. The errors on work requests were very minor and did not contribute to problems in the field. Emphasis since identification has resulted in significant improvement (inspectors comments at last inspection). Cleanliness issue was an isolated case and has been corrected.

The Maintenance team inspection identified the following violation:

- Violation 88-17 Procedure problems related to calibration of control room ground detection circuit, battery undervoltage alarm, certain circuit breaker and 4160 volt switchgear maintenance. The procedural problems were minor and are being corrected. Problems with omitting ground detectors and control room instrumentation resulted from miscommunication on the department responsible many years ago and was missed. This has now been rectified.

The other 3 violations are considered isolated situations.

As noted above, there have been three team inspections that focused heavily in the area of maintenance/surveillance during this review period. The Environmental Qualification (EQ) team inspection (Inspection Report 88-03) concluded that overall the EQ maintenance program is acceptable. The report noted that the program was " changing and improving as the overall maintenance program is being upgraded as a result of prior inspections. Procedure changes and transfer of responsibility have taken place that should improve the program".

The quality verification team inspection report (88-13) noted a number of Violations, but found that the various work practices and procedural controls generally acceptable and that personnel were knowledgeable of their work activities. The following observations were noted within the report:

- The number of valve stroke time failures was very small.
- Maintenance history records did not indicate repetitive failures.
- Based on the low component failure rate and few repetitive failures the licensee's corrective and preventive maintenance programs appeared to be better than average.
- The licensee's maintenance engineering program, with emphasis towards component engineers, appeared to be an effective method of resolving component failures.
- The requirements of ASME 45.2.11 Design Control appeared to be adequately implemented for most engineering activities.
- The preventive maintenance program and MOVATS testing program appears to have created a high operational reliability for plant poer operated valves.
- The ASME Section XI Valve testing program is above average.

The maintenance team inspection report (Inspection Report 88-17) found that Oconee had a very good performance record in the areas of plant availability and very few operational problems attributable to maintenance. The report indicated that management was very supportive of a strong maintenance program and appreciated the fact that good maintenance translates into improved performance and availability. The results of the inspection were summarized as follows: " the licensee has an overall strong maintenance program with a few minor implementation flaws". " The Oconee maintenance program is, for the most part, a very good program with the sound backing of plant and corporate management."

As a final note, Duke has not observed any increase in the inspection in the area of maintenance/surveillance, excluding the team inspection, that one would expect for a functional area that has experienced a decline in performance.

As can be seen above, we do not believe that there have been a sufficient number of problems to be categorized as you did in the cover letter; "Over this assessment period, numerous performance problems were identified characterized by inattention to detail, miscommunication and procedural/personnel errors." In considering the nature of a three unit facility, the length of the SALP period, and the opportunities for discovery with the increased number of team inspections, we feel that our performance in the Maintenance/Surveillance category has improved considerably during the SALP review period and, as such, respectfully request reevaluation of the rating in this area.

Duke Power Company
Oconee Nuclear Station
Attachment 1

SECURITY RELATED
NOT CLASSIFIED

SECURITY AND SAFEGUARDS

The SALP Report had concluded that due to a lack of responsiveness in resolving a long standing issue relating to the assessment capability of the closed circuit television (CCTV) and the increase in the number of violations attributable to personnel error, had detracted from an otherwise favorable evaluation. We are disappointed in the SALP rating chosen. We do not believe that these two items are significant enough to result in the need to reduce the SALP rating from the previous review period. It is our opinion that our performance during this review period has been consistent with our performance from the previous review period.

In the following paragraphs, we provide a discussion of each of the two items of concern that were identified in the SALP report as detracting from an otherwise favorable evaluation.

The CCTV system inadequacies identified during NRC inspection 87-36 although affecting a major portion of the system, provides minimal security system vulnerability. The CCTV system currently covers the intrusion detection zones and is used for initial alarm assessment, but requires supplemental officer response to assess small portions of the isolation zone.

Once identified during the inspection, compensatory measures were immediately implemented. On 9/12-13/87, a complete review of the CCTV system using the same acceptance criteria as the NRC inspector was performed. Additional areas were identified and compensatory measures were implemented.

The Regulatory Effectiveness Review conducted at Oconee on 9/17-24/85 listed the CCTV system as a "Safeguards Strength" in section 2.5.3 of their report. particularly noted the quality of the CCTV pictures at night.

In addition, it is our opinion that management's attention, identified resolutions, and time frames for resolution implementation are appropriate given the minimal security system vulnerabilities.

As indicated in the SALP report, six of the violations cited were licensee identified. We are concerned with the NRC's practices of issuing a violation that appears to warrant discretion. We believe that each of the six violations that were licensee identified are consistent with the criteria of V.G.1. of the NRC Enforcement Policy Statement provided by 10CFR2, Appendix C, and as such should not have been cited.

In addition, none of these "Licensee identified" violations reflect an exploitable weakness in the Oconee Security program. The following paragraphs provide a discussion of each of these violations.

- 1) Violation 87-45 - Allowing an employee into the Protected Area without a security badge.

SECURITY RELATED

NOT CLASSIFIED

The violation as stated is due specifically to individual error based on officer familiarity with the individual who was allowed P. A. access unbadged. Daily, over 2000 individuals are granted access to the P. A. through the main personnel access portal providing for 2000 opportunities for personnel error. Calculated over this reporting period, this would present 528,000 chances for error with only one actual occurrence. With the inclusion of outages, this number is substantially higher. The access process is totally controlled by personnel with no equipment interface required to prevent these types of incidents. This reflects an excellent officer performance record for this area.

The individual concerned recognized the problem, and appropriately notified Security as he had been trained to do through the site training program. This event was reported to the NRC within one hour of the discovery of the occurrence in accordance with Duke Power Company's interpretation of 10CFR 73.71.

- 2) Violation 87-46 - Allowing a visitor into the Protected area without a hands on search.

The violation, as stated, is due specifically to individual error based on the need for a female officer to pat down a female employee when one was not posted in the search lobby. The individual who entered the Protected Area without the hands on search had been processed through operable metal and explosive detectors providing high assurance that no contraband items could have entered the Protected Area undetected. The individual was also properly escorted the entire time. The pat down requirement for visitors no longer exists due to Security Plan changes required for the 10CFR 73.55, Miscellaneous Rules implementation. Consequently, under the new criteria, this is not considered by the NRC to be a Security concern. This event was logged in accordance with Duke Power Company's interpretation of 10CFR 73.71.

- 3) Violation 87-50 - Failure to control Safeguards Information.

It is our position that this violation does not accurately reflect Oconee's security program effectiveness in the area of Safeguards document control. The failure to properly destroy Safeguards materials by corporate personnel was the initiating event and was identified by Corporate Security personnel. Material relating to Oconee, McGuire, and Catawba were all improperly destroyed. Site Procedures, training programs, and audit of the Oconee Safeguard's Document Control program were in place assuring compliance at the time this incident occurred in the Corporate Office.

- 4) Violation 87-50 - Transmitting Safeguards over unprotected telecommunications circuits.

It is our position that this violation as stated is correct and that Safeguards Information was transmitted in an unprotected manner. The majority of Oconee Security Implementing Procedures are processed by the Station Services Word Processing Group. When the Safeguards rule became effective, a review of the Word Processing computer functions was conducted and at that time it was determined the system was fully contained on site

SECURITY RELATED
NOT CLASSIFIED

and secured satisfactorily. In March 1984, the Ocone processors were linked to corporate computers for the purposes of archiving documents for long term retention as were computers at the other Duke sites. The problem was identified by a security staff person at the McGuire Nuclear Station.

- 5) Violation 87-46 - Allowing the training certification of a member of the security force to expire.

This event occurred because of security supervision error. Annual re-qualification to security tasks are conducted as required by the Ocone Training and Qualification Plan. The specific officer in question had his Protected Area Patrol qualification expire. Prior to requalification to task, he was inadvertently assigned Protected Area patrol duties by his supervision. Procedures were in place to assure only qualified personnel are assigned security duties. The supervisor in question failed to follow the established procedures.

The error was identified on the same shift by security shift management and a qualified officer was dispatched to conduct follow up patrol to verify all the required patrol responsibilities had been correctly carried out. No problems were identified. Although the officers qualification had expired, he had been qualified for the previous ten years. This could not have resulted in adversarial exploitability.

- 6) Violation 88-10 - Allowing an escorted visitor into the Protected Area with incorrect access authorization documentation.

While processing an escorted visitor into the station, the security clerk conducting the process retrieved the wrong access document for the subject individual. The last names were the same but the clerk failed to check the individual's photo I. D. closely enough to assure the correct document was used. The individual was being escorted for a station orientation prior to being permanently badged. He had already been approved for unescorted access. No vital areas were entered during this orientation. The violation was identified by the security shift lieutenant.

The final violation, which was identified by a Regional Inspector, concerned a degraded vital barrier. It is our opinion that although this incident is a violation of security plan commitments, it does not represent an exploitable weakness in the Ocone security program. The following is a discussion of the violation:

Violation 88-10 - Degradation of the Control Alarm Station Barrier Bullet Resistivity

The Vital Area in question is the Central Alarm Station (CAS) which by 10CFR must be treated as a vital area, although there is no equipment located in the CAS, vital to the safe shutdown of the station. The CAS is located inside a building that is a separate vital area and designed as such. During an NRC inspection, three (3) openings were located above the ceiling tile. The closest to the floor is approximately 12' which would require a climbing device to reach. Once identified, compensatory measures were implemented until a resolution could be reached.

SECURITY RELATED

NOT CLASSIFIED

After review, it was decided that since the CAS is afforded vital protection by being enclosed in a separate vital area, a security plan revision would be submitted to clarify the CAS protection as the vital area it is enclosed in. The openings were then filled with firestop foam in accordance with Security Plan commitments for bullet resistancy and the compensatory measures were discontinued. As stated, this situation is not exploitable by an adversary since penetration of the primary vital structure must first occur. Additionally, there is no regulatory basis for an independent CAS barrier, (e.g. vital area compartmentalization) since it is located within a larger vital area that also protects it from external weapons vulnerability.

In summary, six of the seven violations were Licensee identified and satisfied the criteria specified in 10CFR2, Appendix C, Section V.G.1., and thus should not have been cited. We agree with the overall assessment provided in the SALP report, collectively considering all seven violations, they do not indicate a major security program breakdown. In addition, Duke has not observed an increase in inspections on the security area that one would expect for a functional area that has experienced a reduction in performance.

As stated above, we do not believe that the two concerns identified warrant a performance decline from a Category 1 to a Category 2 with respect to security. Accordingly, we respectfully request reevaluation of the rating in this area.