

bcc w/copy of 9/17/73 memo:

J. F. O'Leary, L F. Fraley, ACRS (3)
A. Giambusso, L H. D. Thornburg, RO
J. M. Hendrie, L J. P. Murray, OGC
J. G. Davis, RO L. Reeder, RO
P. A. Morris, RO DR Central Files
A. Schwencer, L DR Reading Files
D. J. Skovholt, L RO Files
B. H. Grier, RO PDR
J. P. O'Reilly, RO:I Local PDR
N. C. Moseley, RO:II NSIC
J. G. Keppler, RO:IIIETIC
G. L. Madsen, RO:IV
R. H. Engelken, RO:V

OCT 5 1973

50-269

Duke Power Company
Attn: Mr. Carl Horn, Jr.
President
Power Building
422 South Church Street
Charlotte, North Carolina 28201

Gentlemen:

Thank you for your letter of September 7, 1973, informing us of steps you have taken to correct the violations concerning activities under AEC Operating License No. DPR-38 which were brought to your attention in our letter of August 17, 1973. We will examine your corrective actions and plans during subsequent inspections.

Regarding Item 1.a. of your response, the manipulation by non-licensed personnel of controls as defined in 10 CFR 50.2(t) is a violation of 10 CFR 50.54 requirements. 10 CFR 50.2(t) defines controls when used with respect to nuclear reactors to mean apparatus and mechanisms, the manipulation of which directly affects the reactivity or power level of the reactor. The specific violation noted during the inspection involved the movement of control rods by means of auxiliary lifting devices operated by non-licensed personnel. As movement of control rods directly affects the reactivity of the reactor, this operation should have been performed by a licensed operator or directed by the licensed operator present at the device utilized to move the control rods.

This matter was discussed with Mr. A. C. Thies of your staff by Mr. C. E. Murphy of our Atlanta, Region II Office on October 4, 1973. Should you have any questions concerning this letter, you may communicate directly with this office.

Very truly yours,

B/
John G. Davis, Deputy Director
for Field Operations
Directorate of Regulatory Operations

CRESS OFFICE	RO:FS&EB	RO:FS&EB:C	RO:DDFO			
MC#879550elm	WPE:elm	AD:Thornburg	JG:Davis			
10/4/73 DATE	10/ /73	10/4/73	10/5/73			

DUKE POWER COMPANY

P. O. Box 2178

CHARLOTTE, N. C. 28201

CARL HORN, JR.
PRESIDENT

September 7, 1973

Mr. John G. Davis
Deputy Director for Field Operations
Directorate of Regulatory Operations
U. S. Atomic Energy Commission
Washington, D. C. 20545

Re: Oconee Nuclear Station
Docket No. 50-269

Dear Mr. Davis:

We have received your letter of August 17, 1973 concerning certain activities at Oconee Nuclear Station that apparently were not conducted in full compliance with AEC requirements. Attached is our reply to the specific concerns identified within your letter. We have taken several actions to improve the effectiveness of the quality assurance program and administrative procedures at Oconee Nuclear Station.

Based on information obtained at the June 21, 1973 exit interview and our appraisal of the operating situation at Oconee Nuclear Station, activities that were strengthened were:

- (1) Station Review Committee review of safety-related items
- (2) Classification of equipment and actions as "safety-related"
- (3) Procedure for station modifications

The following changes have been made:

- (1) The Station Review Committee membership has been expanded to include additional members. This will have the effect of providing additional expertise within the committee membership and will provide additional members for discharging the committee's duties.
- (2) A number of the violations cited in the enclosure to your August 17, 1973 letter were the result of improper classification of procedures. In certain cases a miscellaneous test procedure was used with regard to testing of a safety-related structure, system, or component. This was caused when judgment on the part of the individuals involved resulted in certain miscellaneous test procedures being utilized for safety-related testing. This was not in accordance with

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Mr. John G. Davis
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the Steam Production Department "Administrative Policy Manual for Operational Quality Assurance of Nuclear Stations." In the future, all procedures which may involve safety-related items will be classified as safety-related and processed in a manner consistent with the "Administrative Policy Manual for Operational Quality Assurance of Nuclear Stations." In addition, a cooperative effort between the Steam Production Department General Office and the Design Engineering Department is in progress to review identification of the safety-related structures, systems, and components at Oconee Nuclear Station in order that similar errors in judgment may be prevented in the future. This activity is expected to be completed by January 1, 1974.

- (3) At the time of the June 21, 1973 audit by AEC/DRO personnel, modifications were handled as they had been during the construction phase and an operations phase station modification procedure was not in effect. Since that time, a nuclear station modification plan has been developed and has been issued for review and comment by other departments within the company. In the interim, all station modifications are being reviewed by both the Design Engineering Department and the Steam Production Department General Office. It is expected that the finalized, approved plan will be implemented prior to October 15, 1973. The approved plan will be incorporated into the "Administrative Policy Manual for Operational Quality Assurance of Nuclear Stations."

In order to strengthen the participation of the Steam Production Department General Office in the activities of the nuclear station, the Steam Production Department quality assurance staff issued on July 18, 1973 an audit plan which identifies station activities which shall be audited. An objective of these audits is the verification that station safety-related activities are in compliance with established requirements. The audit frequencies are commensurate with the safety significance of the items being audited. In no case is the audit interval greater than 24 months. Provisions are also made for special audits which may be conducted at the request of company management.

To improve the quality and timing of station reports of abnormal occurrences, unusual events, and technical specification violations, an addition to the Administrative Policy Manual, to be incorporated by revision of the manual, was proposed on June 13, 1973. This proposed addition places requirements on the station as to proper timing and distribution of each report. The revision also provides guidance with regard to appropriate report content. We are following this procedure at the present time and expect to revise the Administrative Policy Manual in the very near future.

We believe that the additional emphasis placed on quality work at the station, improved administration of station modifications, implementation


Mr. John G. Davis

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September 7, 1973

of an effective audit plan, expansion of the Station Review Committee membership, and increased management attention to activities within the station will preclude future violations such as those identified in your letter.

Very truly yours,


Carl Horn, Jr.
President

vr

Attachment

REPLY TO AEC/DRO LETTER OF AUGUST 17, 1973

(Attached to C. Horn's Letter of September 7, 1973)

Item 1.a.

Paragraph 50.54(i) of 10CFR50 specifies that manipulation of the controls of a facility shall be under control of a licensed operator.

Contrary to the above, an unlicensed maintenance technician manipulated the control rods while performing miscellaneous test procedure, "Check of Safety and Shim Control Rod Actuators for Frictional Binding."

REPLY

The lifting of a control rod assembly using an air hoist on the auxiliary fuel handling bridge to determine frictional binding is not interpreted to be "manipulation of the controls of a facility" by Oconee Nuclear Station personnel. The work was being performed in accordance with a miscellaneous test procedure, "Check of Safety and Shim CRA's for Frictional Binding." There was no possibility of the reactor going critical during this operation, as the Reactor Coolant System was at refueling boron concentration as required by Section 7.0 of the procedure, "Required Plant Status." In addition, a Limitation and Precaution of the procedure states, "If source count rate increases by a factor of two (2) or more, suspend further motion and evaluate." Section 8.0, "Prerequisite System Conditions," requires "Establish communication with control room over fuel loading command sound-powered telephone circuit with operator at CRDS in direct communication with Reactor Operator in control room." It is true that a licensed operator was not in the Reactor Building directing the movement of the control rod, however, the operation was being controlled by a licensed operator in the control room monitoring the source count rate instrumentation. Due to this control and monitoring by a licensed operator, with the requirement to "suspend further motion and evaluate" if the count rate increased by a factor of two or more, and due to the fact that the Reactor Coolant System was at a boron concentration of greater than 1800 ppm boron, we do not feel that the safety of the unit was in any way compromised. If after further evaluation it is determined that this procedure is not acceptable, we can require that a licensed operator be present in the Reactor Building to observe and direct similar activities in the future. We would like to have further discussions with the AEC on this item.

Item 1.b.

Paragraph 50.59(b) of 10CFR50 requires a documented safety evaluation of the basis for the determination that a change of the facility does not involve an unreviewed safety question.

Contrary to the above, written safety evaluations were not prepared for modification of the following safety-related equipment:

- (1) RCP Oil Drain System
- (2) Turbine Bypass Control Modification
- (3) Feedwater Flow-Turbine Trip
- (4) Electrical Auxiliary Transfer
- (5) CRD Motor Fault Time Delay

REPLY

The modifications listed did not receive a documented station safety evaluation. During the interval between issuance of the Facility Operating License and June 1973, the station was in a transition period in that responsibility for station modifications was being transferred from the Design Engineering Department to the Steam Production Department. It was assumed that Design Engineering, in accordance with the Design Engineering quality assurance program, performed safety evaluations for design changes and modifications which they had approved and directed the Construction Department to perform. All of the above modifications noted were reviewed and approved by Design Engineering.

Since transfer of responsibilities to Steam Production is now complete, the Oconee Nuclear Station organization has the responsibility for verifying that required documented safety evaluations have been performed by appropriate organizations prior to implementation of the modifications.

A permanent plan for station modifications is presently under review within the Steam Production Department. An interim plan which was issued July 16, 1973, is in use. It is expected that the permanent plan will be implemented prior to October 15, 1973. The interim plan requires that all modifications have a safety analysis performed or that a documented determination be made that the modification does not affect a safety-related structure, system or component.

Item 1.c.

Criterion II of Appendix B to 10CFR50 requires management review of the status and adequacy of the quality assurance program.

Contrary to the above, the Nuclear Safety Review Committee (NSRC) failed to act on 18 items which had been placed before the Committee for resolution during the period November 1971 to January 1973.

REPLY

The Nuclear Safety Review Committee is an independent group established to help verify that the operation of Oconee Nuclear Station is performed in a safe manner consistent with approved operating procedures and license provisions; to review important proposed station changes, tests, and procedures; to verify that unusual events and abnormal occurrences are properly investigated and corrected in a manner which reduces their probability of recurrence; and to detect trends which may not be apparent to a day-to-day observer. In performing its duties, the committee reports its findings and recommendations to the Executive Vice President and General Manager; Senior Vice President, Production and Transmission; Senior Vice President, Engineering and Construction; Vice President, Design Engineering; Assistant Vice President, Steam Production; and the Oconee Station Superintendent. The committee has acted on the items that it deems within its purview, as determined by the Oconee Nuclear Station's Technical Specifications and the committee's by-laws. In the performance of its duties, the committee maintains a list of outstanding items which includes recommendations that the committee has previously made and the status of each. The 18 items referred to above were recommendations, made by the committee in the performance of its duties, to various individuals within the company. Some of these recommendations had not been acted upon at the time of this audit. In order to assure that all committee recommendations are acted upon by responsible company personnel in a timely manner, Mr. E. D. Powell, Assistant Vice President, Steam Production has appointed a member of his staff to routinely review the status of the committee's recommendations, to expedite resolution of the committee's recommendations and to report the status of the recommendations to him. In this manner, the committee's recommendations should be resolved in a more timely manner.

Item 1.d.

Criterion V of Appendix B to 10CFR50 states, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Contrary to the requirements of this criterion:

(1) Implementation of safety-related design changes was not as prescribed by applicable station instructions. The following design changes were completed without prior submission to the Station Review Committee for review, and without review by the Station Superintendent to determine if the change could proceed with his approval or whether additional review and approval was required:

- (a) Control Rod Drive Gas Vent Piping
- (b) RCP Oil Drain System
- (c) Turbine Bypass Control Modification
- (d) Feedwater Flow-Turbine Trip
- (e) Electrical Auxiliary Transfer
- (f) CRD Motor Fault Time Delay

REPLY - 1.d(1)

Administrative Procedure No. 10 requires that proposed modifications to station safety-related structures, systems and components be submitted in the form of a Station Problem Report to the Chairman of the Station Review Committee. The procedure requires that the Station Review Committee review the request, and if the request is approved, forward the request to the Station Superintendent; and requires that the Station Superintendent determine if the modification adversely affects the proper functioning of safety-related structures, systems, or components. Requests for modifications that were originated within the station itself were being handled in a manner consistent with Administrative Procedure No. 10. However, modifications that were made by Design Engineering Department were being handled in a manner similar to that used during the construction of the station.

In order to provide a consistent method for administering station modifications, a permanent plan is currently under review within the Steam Production Department as described in the reply to 1.b. above. The Station Superintendent and the Station Review Committee must approve all modifications to safety-related structures, systems and components before work is initiated.

Item 1.d. (Continued)

(2) Implementation of safety-related tests was not as prescribed by applicable station procedures and instructions. The following miscellaneous test procedures had not been properly classified as safety-related and assigned an alpha-numeric designation as required by paragraph 4.4.4.2 of the Administrative Policy Manual for Operational Quality Assurance (APM/NS), to assure proper reviews and approvals:

- (a) 4160 V Bus Transfer Time Test
- (b) Emergency Feedwater Pump Functional Test
- (c) Check of Safety and Shim Control Rod Actuators for Frictional Binding
- (d) Auto Transfer from 1T to CT1 Transformer Without Generator Lockout
- (e) Inspection of Retainer Nuts on ES Valves
- (f) Hydro of RC-48
- (g) Shuffling Control Components in Spent Fuel Pool

REPLY - 1.d(2)

Tests which have a safety relationship should be assigned alpha-numeric designations and receive the proper review and approval before being used, as required by APM/NS. It is recognized that some safety-related tests have been performed using miscellaneous test procedures and did not receive the proper review and approval. Therefore, on June 22, 1973, the Oconee Station Superintendent issued an Intrastation Letter to all Supervisors and Station Test Coordinators requiring that safety-related tests must be administered in accordance with the provisions of APM/NS. This will prevent recurrence of these violations. A copy of this letter is enclosed as Attachment 1.

Item 1.d (Continued)

- (3) The following miscellaneous test procedure was revised and the revisions were not processed as required by Paragraph 4.4.6.1 of the APM/NS:
Emergency Feedwater Pump Functional Test.

REPLY - 1.d(3)

The "Emergency Feedwater Pump Functional Test" was improperly classified as a miscellaneous test procedure. Miscellaneous test procedures are not intended to address safety-related testing and, consequently, are not addressed by the "Administrative Policy Manual for Operational Quality Assurance of Nuclear Stations" (APM/NS). The classification of this test as a formal Preoperational Test Procedure (TP) would have resulted in the procedure being subject to the requirements of the APM/NS. The proper classification of future tests has been addressed in the reply to Item 1.d(2) above.

Item 1.d (Continued)

- (4) The following miscellaneous test procedure did not provide adequate instructions and limits for conduct of the test: Check of Safety and Shim Control Rod Actuators for Frictional Binding.

REPLY - 1.d(4)

As stated in the reply to Item 1.d(2), improper classification as a non-safety-related test procedure led to the deficiencies in this procedure, and corrective measures have been discussed above.

With regard to this specific test, however, in the exit interview on June 21, 1973, a Regulatory Operations inspector listed the following deficiencies in the procedure:

- (a) The minimum boron concentration of the reactor coolant was not specified.
- (b) The verification of proper operation of the nuclear instrumentation was not specified.
- (c) The qualifications of the hoist operator were not specified.
- (d) There was no limitation on the number of control rods that could be in the "out" position at any one time.
- (e) There was no requirement that the re-insertion of the control rod be verified.
- (f) There was no requirement that the position indication be verified at any time during the operation.
- (g) The procedure did not provide any method, such as check sheets, to assure that the procedure steps were followed or to document that the procedure was followed.
- (h) The procedure did not specify the steps to be followed in the event of an emergency.
- (i) The procedure did not require that a licensed operator manipulate the controls or to be present when the controls were manipulated. (Controls in this case being the air hoist.)

Item (a) is not considered a deficiency in the procedure, "Check of Safety and Shim Control Rod Actuators for Frictional Binding," in that Section 7.0, "Required Plant Status," required that the Reactor Coolant System be at re-fueling boron concentration. This concentration is defined to be greater than 1800 ppm boron, therefore, minimum boron concentration was specified. We agree with the concern in (b), (c), (d), and (e) and these comments will be incorporated into any subsequent procedures. With regard to Item (f), the operation involved was monitored for position indication by a tape measure

which was used to indicate the position of the control rod during withdrawal and insertion. Comment (g) indicates that no method was provided such as check sheets to assure that procedure steps were followed. Data sheets were provided and were properly filled in supplying the information required in the procedure. For Item (h), the procedure did not specify an emergency action. It did, however, require termination of the operation if the source count rate increased by two or more. Item (i) is addressed in the reply to Item 1.a.

Item 1.d (Continued)

- (5) The following miscellaneous test procedure did not receive the proper approval or review as required by Paragraph 4.3.2.2.8 of the APM/NS:
Inspection of Retainer Nuts on ES Valves.

REPLY - 1.d(5)

"Inspection of Retainer Nuts on ES Valves" was improperly classified as a miscellaneous test procedure. Miscellaneous test procedures are not intended to address safety-related testing and, consequently, are not addressed by the "Administrative Policy Manual for Operational Quality Assurance of Nuclear Stations" (APM/NS). The classification of this test as a formal Pre-operational Test Procedure (TP) would have resulted in the procedure being subject to the requirements of the APM/NS. The proper classification of future tests has been addressed in the reply to Item 1.d(2) above.

Item 1.e

Criterion VI of Appendix B to 10CFR requires documents and changes thereto that affect quality to be reviewed and approved.

Contrary to the above, revisions to miscellaneous test procedure, "Emergency Feedwater Pump Functional Test," were made without approval and review as required by APM/NS, Paragraphs 4.4.2.2.3 and 4.4.6.1(c) and (g).

REPLY

The "Emergency Feedwater Pump Functional Test" was improperly classified as a miscellaneous test procedure and, therefore, was not subject to the requirements of the "Administrative Policy Manual for Operational Quality Assurance of Nuclear Stations." This error, and the subsequent ramifications, such as improper administration of procedure revisions, is being corrected as discussed in the reply to Item 1.d(2) above.

Item 1.f

Criterion XI of Appendix B to 10CFR50 states, in part, that test procedures incorporate design requirements and acceptance limits.

Contrary to the above, miscellaneous test procedure, "4160 V Bus Transfer Time Test," did not provide acceptance limits or applicable design documents such that the test coordinator could determine whether or not the test had been successful.

REPLY

The stated purpose of the procedure was to determine the operating time of breakers B1T1 and B1T3. The procedure did not state acceptance criteria other than "data gathering for Design Engineering information." The procedure was conducted only to obtain information for Design Engineering relating to the actual time to transfer and any notation of voltage transients during the rapid transfer from the normal to startup source. This test has yet to be completed. It has been assigned an alpha-numeric number TP/1/B/0610/16 and again has the same acceptance criteria.

Item 1.g

Criterion XIV of Appendix B to 10CFR50 requires that the operating status of safety-related components be identified.

Contrary to the above, following performance of miscellaneous test procedure, "Auto Transfer from 1T to CT1 Transformer Without Generator Lockout," the status of the emergency start relays was not verified.

REPLY

Citation for violation of Criterion XIV of Appendix B to 10CFR is due to failure to establish the status of the emergency start relays following performance of miscellaneous test procedure "Auto Transfer from 1T to CT1 Transformer Without Generator Lockout." The procedure was performed with the requirement that the Keowee Hydro emergency start relays be disabled. The procedure was deficient in that it did not require documentation that the emergency start relays were returned to normal conditions following the test. Subsequent testing of the Keowee Hydro unit have verified that the emergency start relays were operating properly.

Future tests of the auto transfer will require that the proper condition of emergency start relays be verified prior to returning the system to operating status.

Item 1.h

Criterion XVI of Appendix B to 10CFR50 requires that conditions adverse to quality be promptly identified and corrected.

Contrary to the above, there is apparently no formal method for assuring that the superintendent be made aware of unusual events and abnormal occurrences so that these may be assigned for prompt investigation and correction.

REPLY

Effective June 28, 1973, an Incident Reporting Form has been provided which not only documents that the Station Superintendent is notified of incidents, including unusual events and abnormal occurrences, but that proper reporting to the Steam Production Department General Office and to the Atomic Energy Commission is performed. This form along with an Intrastation Letter dated June 28, 1973, should correct this deficiency. Copies of these are attached as Attachment 2 and Attachment 3.

Item 1.1

Technical Specification 6.1.2.1, "Station Review Committee," specifies the functions and responsibilities of the Station Review Committee (SRC).

Contrary to the requirements of this technical specification:

- (1) The SRC did not always have a quorum in attendance at its meetings.
- (2) The SRC failed to review new procedures, proposed revisions to safety-related procedures and test results. This is recorded in the SRC minutes of March 29, April 5, 10, 16, 19, 25, 27, and 30, May 8 and 22, and June 15, 1973. Miscellaneous test procedures, "4160 V Bus Transfer Time Test," and "Shuffling Control Components in Spent Fuel Pool," were not reviewed by the SRC.
- (3) The SRC failed to review station operation and safety considerations. Specifically, the minutes of the SRC did not reflect that the SRC had reviewed the premature lifting of the main steam relief valves.

REPLY

- 1.1(1) Since January 1, 1973, the Station Review Committee has met 96 times. One of these times a quorum was not in attendance; however, the Station Superintendent was present during this meeting.

At certain times it is difficult to obtain a quorum of SRC members. To alleviate this, the Superintendent has appointed additional plant personnel to serve on the Station Review Committee.

In the future, Station Review Committee business will not be conducted unless a quorum of appointed Station Review Committee members is present.

- 1.1(2) A limited number of procedures were not reviewed by the Station Review Committee because they were classified as miscellaneous procedures. The "4160 V Bus Transfer Time Test" and "Shuffling Control Component in the Spent Fuel Pool Test" fall into this category. Miscellaneous procedures of a safety-related nature have been discontinued at Oconee, therefore, failure of the Station Review Committee to review new procedures will not recur. In the past, the Station Review Committee did not review all changes to existing procedures, but did review a certain percentage of the changes selected on a random basis. However, changes to all procedures were reviewed by one of the Oconee Nuclear Station Group Heads each of which is a member of the Station Review Committee. In the future, all changes to procedures will be reviewed by the Station Review Committee as presented to the Committee by the Group Head responsible for the procedure and change.

The Station Review Committee is not required to review all test results. The committee does review test results as they pertain to major evolutions of station operations; such as, completion of hot functional testing, fuel loading, zero power physics testing, and major power plateaus of power escalation testing prior to proceeding with the next step or phase of operations.

- 1.i(3) Station Review Committee minutes numbered 73-52 and dated June 6, 1973 do in fact document review by the Station Review Committee of premature lifting of the main steam relief valves on Unit No. 1.

Item 1.j

Technical Specification 6.2.2 specifies that the superintendent shall cause the SRC to perform a review and prepare a written report for any abnormal occurrences and unusual events.

Contrary to the requirements of this technical specification, as determined from discussions with the staff and from available documentation, it was not evident that the superintendent caused the following incidents to be reviewed.

- (1) Abnormal Occurrence - Leak in Incore Instrumentation Line
- (2) Unusual Event - Oil Fire at RCP-1A1
- (3) Engineered Safeguard Valve CF-1 not fully open
- (4) Engineered Safeguard Valves BS-1 and -2 failed to open

REPLY

The report of the valve CF-1 failure was reviewed by the Station Review Committee on May 3, 1973. Failure of Valves BS-1 and -2 to open was reviewed by the Station Review Committee on April 6, 1973. Minutes of these meetings are identified as SRC Meetings 73-30 and 73-28, respectively. These were available at the station for review at the time of the DRO audit. The report of the abnormal occurrence, "Leak Through Incore Instrument Line," dated May 24, 1973, was reviewed by the Station Review Committee in their June 25, 1973 meeting (73-63). The unusual event associated with the oil fire at RCP-1A1 is being reviewed by the Station Review Committee. We believe the new method of documenting and initiating investigations of incidents instituted June 28, 1973 (see Attachments 2 and 3) will provide a more timely handling of these incident reports.

Item 1.k.

Technical Specification 6.5, "Station Operating Records," specifies the required records to be retained at the station.

Contrary to the above, the minutes of the NSRC meetings held since January 30, 1973 were not available at the station.

REPLY

During the exit interview, minutes of the March 9, 1973 and March 20, 1973 NSRC meetings had been incorrectly filed but were shown to the AEC/RO inspectors during their inspection.

At the time of the Regulatory Operations audit only the preliminary minutes of the May 30-31, 1973 NSRC meeting were not available. Since these were not approved, Regulatory Operations Inspectors were not allowed to review these minutes. They were informed that the preliminary minutes had been issued for comment by the NSRC members.

Previously, the NSRC has issued minutes of their meeting in preliminary form, and after comments are received, final minutes are issued. At the August 28, 1973 meeting, the NSRC decided to issue minutes in final form as soon as possible after each meeting; any corrections to previous minutes will be noted in the next meeting minutes.

Item 2

Violations considered to be of Category III severity are as follows:

Criterion XVII of Appendix B to 10CFR50 requires certain records to be maintained as evidence of activities affecting quality.

Contrary to the above, accurate records were not available regarding the performance of miscellaneous test procedures, "Emergency Feedwater Pump Functional Test," and "Inspection of Retainer Nuts on ES Valves."

REPLY

It is believed that bringing safety-related tests of this nature under the formal testing program for review, approval and auditing, as required by the "Administrative Policy Manual for Operational Quality Assurance of Nuclear Stations" will correct the deficiencies noted in documentation of information in these two procedures.

The procedure regarding inspection of retainer nuts on ES valves had several erasures or marking over of signs to indicate "less than" which made it difficult, in some instances, to determine if the acceptance criteria had been met. Proper auditing of such data will prevent recurrence of this deficiency.

The miscellaneous test procedure, "Emergency Feedwater Pump Functional Test," has been reviewed and deficiencies were noted. There were a number of blanks on data sheets not completed and several data items in the procedure had not been properly initialed. Proper auditing of these procedures following their completion will help correct this condition.

In addition to the above, an Intrastation Letter has been issued to all Supervisors and Station Test Coordinators noting the deficiencies as found in these two procedures with a reminder of the necessity of being accurate and complete in the documentation as specified in test procedures. (See Attachment 4)

INTRASTATION LETTER
OCONEE NUCLEAR STATION

June 22, 1973


TO: Supervisors and Test Coordinators

SUBJECT: Miscellaneous Tests

In a meeting with members of the AEC/RO Branch on June 21, 1973, we were informed that we were in violation of our Quality Assurance Manual by conducting tests on safety related systems without following the procedure for review and approval as specified in the Quality Assurance Manual. To bring ourselves in compliance with our Quality Assurance Manual and Appendix B of 10CFR50 on future testing of safety related systems or relating to safety, procedures must be reviewed and approved according to our Quality Assurance Manual Section 4.3 and 4.4. Miscellaneous Tests are to be performed only when there is no safety related system or safety considerations involved. Group Heads are to make this determination.

The AEC audit of this particular area has indicated a number of Miscellaneous Tests that have been performed without following our Quality Assurance Manual. It is realized that this will have an effect on expediting Miscellaneous Tests but we have no alternative. This requirement must be rigidly applied.

Where tests not covered by the Test Index are provided, a number for the procedure should be secured from either L. E. Summerlin or D. J. Rains. We will then correct the Procedure Index to reflect the addition of these tests.



J. Ed Smith
Superintendent

JES/vb

ccs: Mr. E. D. Powell
Ms. D. Brackett
Ms. M. Bramlett
Ms. J. Hollins

INTRASTATION LETTER
OCONEE NUCLEAR STATION

June 28, 1973

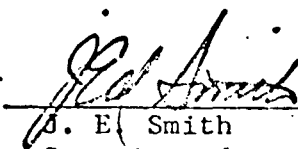
TO: Mr. J. W. Hampton
Group Heads

SUBJECT: Reporting of Station Incidents

When an incident occurs here at the Station which could be interpreted as a violation of Technical Specifications it should be reported immediately to myself or, in my absence, to J. W. Hampton. This incident will then be discussed with K. S. Canady or S. E. Nabow, by myself or J. Hampton, to determine whether its reportable to AEC/RO as an Abnormal Occurrence, an Unusual Event, or other Technical Specification violation. We will also determine the degree and type of investigation which is to be initiated. Upon making this determination with K. S. Canady or S. E. Nabow, I or J. Hampton will contact Mr. Frank Jape, AEC/RO, to report this Technical Specification violation.

Following this reporting to the AEC/RO, the investigation of the incident and preparation of a report will be initiated with copies of this report being sent to J. W. Hampton as Chairman of the Station Review Committee and myself. The Station Review Committee will then review the incident for possible safety implications and act to correct the situation and preclude recurrence. Copies of the Station Review Committee findings, along with a copy of the Incident Report, are to be forwarded to the following individuals:

Mr. Lionel Lewis - Chairman, Nuclear Safety Review Committee
Mr. K. S. Canady as person responsible for preparing any
written report to AEC/RO.
Mr. J. E. Smith - Superintendent's File
Mr. J. Cox - QA File


J. E. Smith
Superintendent

JES/vb

DUKE POWER COMPANY
OCONEE NUCLEAR STATION

Date _____

Unit _____

Incident Investigation Report No. _____

Time/Date of Incident _____

Incident _____

Time/Date Reported to Supt. _____

Time/Date Reported to Gen. Office _____

Tentative Type of Incident: _____ AO, _____ UE, _____ TSV, _____ Other

General Office Representative Contacted _____

AEC/RO Region II Notified: _____ Yes _____ No.

Time/Date _____

AEC Inspector Contacted _____

Type of Incident: _____ AO; _____ Tentative, _____ Declared

_____ UE; _____ Tentative, _____ Declared

_____ TSV; _____ Tentative, _____ Declared

Investigator Assigned _____

Routing:	<u>This Form</u>	<u>Report</u>	<u>SRC Report</u>
Supt.	_____	_____	_____
SRC	_____	_____	_____
NSRC	_____	_____	_____
Investigator	_____	_____	_____
QA	_____	_____	_____
Gen. Office (KSC)	_____	_____	_____
Other (Specify)	_____	_____	_____

REMARKS: _____

INTRASTATION LETTER
OCONEE NUCLEAR STATION

August 29 , 1973

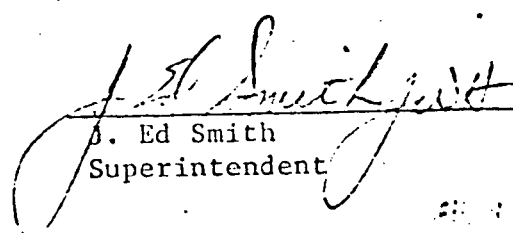
TO: All Supervisors and Test Coordinators

SUBJECT: Complete and Proper Documentation of Test Procedures

In the June 21, 1973 audit performed by AEC/RO personnel, several Test Procedures were reviewed which were in the Miscellaneous Test Procedure category. As noted in my Intrastation Letter of June 22, 1973, the use of Miscellaneous Tests are restricted to tests on non-safety related systems and those which do not involve safety considerations. However, regardless of the type of test we are conducting it is important that complete and accurate records be obtained at the time the test is performed. Several of the procedures reviewed by Regulatory Operations personnel turned up deficiencies in areas such as:

1. Data Sheets not complete. Where information is called for on data sheets, the data has been omitted. Where data is specified, the data should be entered or if not applicable, it should be so noted and initialed.
2. Blanks for notation of data taker are not filled in. It is preferable to sign data sheets rather than initial them.
3. Proposed procedure revision forms are only partially complete. The approval (Item 13 on the form) are not completed.
4. Proposed changes as listed in Item 6 on the Proposed Revision Form are not being properly made in the body of the procedure.
5. Data is being taken and then marked over making it highly illegible and easily misunderstood. Where mistakes such as these are made proper erasures should be made, or when made in ink they should be marked out and rewritten with proper initials of the individual making the change. In most instances it would be preferable to get a clean data sheet and start over

When a Supervisor or Test Coordinator is using other personnel to obtain data it is important that the Test Coordinator or Supervisor review the data sheets to assure that the above problem areas do not exist.


J. Ed Smith
Superintendent

JES/vb