

DUKE POWER COMPANY

P.O. BOX 33189
CHARLOTTE, N.C. 28242

HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

TELEPHONE
(704) 373-4531

July 28, 1983

Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 29C0
Atlanta, Georgia 30303

USNRC REGION II
ATLANTA, GEORGIA
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Subject: McGuire Nuclear Station
Docket Nos. 50-369 and 50-370

Reference: RII:W.O.,J.R.
50-369/83-21, 50-370/83-29

Dear Mr. O'Reilly:

Please find attached a response to Violations 50-369/83-21-01, 50-370/83-29-01, and 50-369/83-21-02 which were identified in IE Inspection Report 50-369/83-21, 50-370/83-29. Duke Power Company does not consider any information contained in this report to be proprietary.

Very truly yours,

H.B. Tucker
Hal B. Tucker

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Attachment

cc: Mr. W. T. Orders
NRC Resident Inspector
McGuire Nuclear Station

Duke Power Company
McGuire Nuclear Station

Response to Violations 369/83-21-01,
370/83-29-01, and 369/83-21-02

Violation 369/83-21-01 and 370/83-29-01, Severity Level IV:

Technical Specification 6.8.1 requires that written approved procedures shall be established, implemented, and maintained covering activities on safety-related systems. Per this requirement the licensee is to follow procedures and provide adequate guidance in them.

Contrary to the above, in the two instances cited below, the licensee failed to follow a safety-related system test procedure and implement adequate guidance in another procedure.

Violation 369/83-21-01

On April 13, 1983, while performing Unit 1 containment spray system surveillance test, the operator failed to follow Procedure PT-1-A-4207-01B, which resulted in misalignment of the containment spray system recirculation valves and ultimately to the overpressurization of the 'A' pump suction header. The relief valve lifted as designed, thus maintaining structural integrity of the piping.

Response:

Duke Power Company agrees that the Containment Spray System (NS) was overpressurized at the 'A' pump suction header. This event resulted from simultaneous realignment of recirculation valves for the performance test of NS pumps 1A and 1B. The NS pump 1B test procedure required valve 1-NS-25 to be closed which in fact was opened due to preparing for the test on NS pump 1A.

Corrective action consisted of aligning the NS recirculation valves properly and repeating the test. To avoid problems in the future, the containment spray periodic test procedures for pumps 1A and 1B, and the IWP pump monthly test, have been revised. All involved personnel have reviewed the revised procedures. The Containment Spray System operability was not required during the period of March 30 to April 27, 1983 due to the unit remaining in modes 5 and 6. McGuire Nuclear Station is presently in full compliance with Technical Specification 6.8.1 requirements.

Violation 370/83-29-01

On March 29, 1983, an inadvertent actuation of the safety injection system occurred while returning the solid state protection system (SSPS) to its normal lineup. The procedure in use, IP/O/A/3090/02, lacked appropriate guidance for re-energization of the SSPS. The unit was in cold shutdown and no injection occurred.

Response:

Duke Power Company agrees that the McGuire Nuclear Station controlling procedure for Instrument and Electrical Safety-Related Maintenance did not contain adequate guidance for re-energizing of the SSPS. The violation occurred due to the lack of guidance in the procedures and the procedure not adequately covering troubleshooting the SSPS in all modes of operation.

Since the incident occurred, a total rewrite of the procedure for troubleshooting the SSPS has included the ability to troubleshoot the SSPS in any mode. Also, particular attention was paid to the section of the procedure on re-energization of the SSPS specifying the correct position of all the test switches on the SSPS test panel. Also, to avoid further problems in this area, the I&E technicians have been informed of the potential problem which can result from moving any of the SSPS test switches while a train is in operation. Technicians have also been reminded of the importance of using proper procedures when working on any safety related equipment. McGuire Nuclear Station is presently in full compliance in this area.

Violation 369/83-21-02, Severity Level IV:

10 CFR 50, Appendix B, Criterion VI as implemented in the Duke QA Topical Report, Duke 1-A Section 17.2, requires that measures be established to control the issuance of documents to assure that the documents are approved and adequate.

Contrary to the above, on March 30, 1983, controls to assure adequate approved documents failed in that during a review of documentation concerning safety related maintenance on the reactor trip breakers, both the appropriate maintenance procedure and current vendor manual had been misfiled and mislabeled leaving the old documents in force.

Response:

Duke Power Company agrees that the maintenance procedure revision for safety-related maintenance on the reactor trip breakers was misfiled. This procedure revision had been labeled and therefore filed according to the Transmission Department identification number rather than the correct procedure identification number.

Because of this violation, all procedures developed by the Transmission Department for use at McGuire Nuclear Station were audited to ensure proper labeling and filing. To avoid further problems in this area, all procedures will be compared to Transmission Department procedures to ensure that the latest revisions are in the Master File at McGuire. Random checks will be performed by Master File clerks to ensure the procedures are being properly labeled and filed. McGuire Nuclear Station will be in full compliance by September 1, 1983.

Duke Power Company does not agree that a current DS-416 vendor manual had been mislabeled and misfiled. Vendor manual MCM-1399.40-18, Reactor Trip Switchgear Breaker Instruction Manual, was a completely new vendor manual which replaced one section of vendor manual MCM-1399.39-1 that dealt with the maintenance of DS-416 breakers. However, Duke Power does agree that superseded information on DS-416

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breaker maintenance had not been removed from vendor manual MCM-1399.39-1. As a result, a manual change was issued to remove this section of MCM-1399.39-1 and insert a single sheet indicating that the new manual MCM-1399.40-18 should be utilized. The manner in which vendor manuals and manual changes are received and distributed is in the process of being reviewed in conjunction with the requirements of NRC Generic Letter 83-28. McGuire is presently in full compliance in this area.