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DUKE POWER

June 4, 1991

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Inspection Report 50-269, -270, -287/91-09
Reply to Notice of Violation

Dear Sir:

By letter dated May 7, 1991, the NRC issued Inspection Report Nos. 50-269/91-09, 50-270/91-09 and 50-287/91-09 with a Notice of Violation. Pursuant to the provisions of 10 CFR 2.201, I am submitting a written response to the violation identified in the above Inspection Report.

Very truly yours,

M. S. Tuckman, Vice President
Nuclear Operations

RRE192/wp

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

NRC Resident Inspector
Oconee Nuclear Station

Mr. L. A. Wiens
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
One White Flint North, Mail Stop 9H3
Washington, DC 20555

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VIOLATION (#287/91-09-02), SEVERITY LEVEL (IV)

Technical Specification 6.4.1 requires that the station be operated and maintained in accordance with approved procedures. Procedure OP/3/A/1102/10, Controlling Procedure for Unit Startup, Enclosure 4.5, Preheat Reactor Building Startup Valve Checklist, requires valves 3LPSW-563 and 3LPSW-564 to be shut prior to reaching Reactor Coolant System temperatures and pressures of 250 degrees fahrenheit and 330 psig respectively.

Contrary to the above, Unit 3 was not operated and maintained in accordance with approved procedures in that, on April 12, 1991, valves 3LPSW-563 and 3LPSW-564 were found open. They had been open since March 24, 1991, to meet existing plant conditions at that time but were not shut when a new startup procedure was initiated.

RESPONSE:

1. Reason for the violation:

The reason this violation occurred was the use of an inadequate procedure. The mispositioned valves, 3LPSW-563 and 3LPSW-564, were opened by sign-off steps in the shutdown procedure, but were not set apart as sign-off steps in the startup procedure. They were controlled by a checklist containing Reactor Coolant Pump cooling water valves in the startup procedure. Since the procedure didn't set the valves apart, the fact that they needed to be repositioned was overlooked during the startup following the cooldown for incore instrument leak repair.

A contributing factor to this violation was the inadequate review of the completed checklist containing 3LPSW-563 and 3LPSW-564. The checklist completed during the post-refueling outage heatup was not properly reviewed as completed and was left in the startup procedure notebook in use at the time. Since this checklist was found in the notebook, the SRO signed off the step in the new pre-heatup checklist requiring that this enclosure of the procedure be run.

2. Corrective steps that have been taken and the results achieved:

The immediate corrective action was to place the valves in their required position. In addition, the SRO that signed off the pre-heatup checklist per the inappropriate valve checklist was counseled in the proper use of completed checklists.

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

Procedure changes will be incorporated in the startup procedures for all three Oconee units. These changes will set the fire station isolation valves apart as a sign-off step in the body of the procedure. The shutdown procedure will also be changed to standardize the point at which the valves are opened and closed.

A review of the startup and shutdown procedures will be performed to identify similar opportunities for improvement.

A training package will be issued emphasizing the necessity of caution when signing off steps of procedures based on previously completed procedures and the necessity of processing completed checklists in a timely manner. This training package will be reviewed by all licensed operators.

4. Date of full compliance:

Procedure changes impacting the fire station isolation valves will be completed prior to the Unit 1 refueling outage scheduled to begin August 1, 1991.

Procedure changes resulting from the more comprehensive review of the startup and shutdown procedures will be completed before January 1, 1992.

The training package will be issued before August 1, 1991.