

DUKE POWER COMPANY REGION II
POWER BUILDING ATLANTA, GEORGIA

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WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

May 6, 1982

TELEPHONE: AREA 704
373-4083

Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Subject: McGuire Nuclear Station
Docket No. 50-369

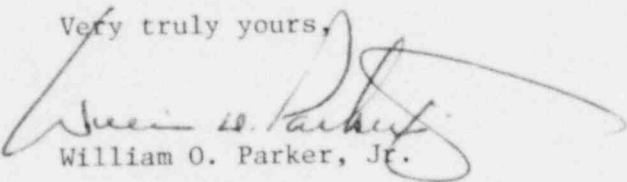
Reference: RII:PTB
50-369/82-09

Dear Mr. O'Reilly:

Please find attached a response to violation 50-369/82-09-01 which was identified in the above referenced inspection report. Duke Power Company does not consider any information contained in this report to be proprietary.

I declare under penalty of perjury that the statements set forth herein are true and correct to the best of my knowledge.

Very truly yours,


William O. Parker, Jr.

PBN/jfw
Attachment

DUKE POWER COMPANY
McGUIRE NUCLEAR STATION
RESPONSE TO I. E. INSPECTION REPORT 50-369/82-09

VIOLATION 50-369/82-09-01, SEVERITY LEVEL IV:

License Condition 2.C(3) requires major modifications to the initial test program, as set forth in Section 14 of the FSAR as amended, not be made without prior NRC approval. Changing an acceptance criterion of an essential test is a major modification.

Contrary to the above, an acceptance criterion for the essential test, "Dynamic Rod Drop Test" procedure TP/1/A/2150/08, was changed in a non-conservative manner in that the acceptable number of negative rate trips, in response to a double rod drop, was reduced from three out-of-four channels responding to two out-of-four. The test is described in Table 14.1.4-1 and the acceptance criteria addressed in Questions and Responses 413.9, 413.10 and 413.18 of the FSAR.

RESPONSE

1. Duke Power Company agrees that the violation occurred as stated.
2. Prior to the performance of TP/1/A/2150/08 the Reactor Engineering Staff was informed by an onsite Westinghouse NSD representative that only two-out-of-four channels should be expected to trip in response to a double rod drop. He stated that similar results had been seen at other Westinghouse four-loop plants and that the NRC was aware of the situation.

After the test was run an initial review of the test data indicated only two out-of-four channels tripped. Westinghouse was requested to provide a letter confirming the acceptability of the test results. Duke received correspondence from Westinghouse in response to this request, which indicated that the test as run was acceptable and that the NRC was aware of the expected results.

The FSAR test abstract in Chapter 14 and the response to Question 413.10 were reviewed to determine whether NRC notification was required to change the acceptance criteria. (Question 413.9 does not apply to this test and Question 413.18 was overlooked). A decision was made at that time that NRC notification was not required for the following reasons:

- 1) FSAR test abstract acceptance criteria did not specify the number of channels required to trip, only that the reactor trip.
- 2) Interim rod operating limits were in effect that preclude any potential safety concerns for rod drop transients.
- 3) Westinghouse correspondence indicated the acceptability of the test with only 2 of 4 channels tripping.

3. An analysis was performed by Westinghouse which showed that all four channels appeared to have tripped in response to the double rod drop. Duke representatives discussed the issue with Westinghouse and requested they re-examine the test results. Both Duke and Westinghouse agree that the test data does not show conclusively that three out-of-four channels tripped. Pending final resolution of the issue, pre-operational test procedure TP/1/A/2150/08 will be reopened (previously the test had been approved and closed on the basis of the revised acceptance criteria).

Personnel involved have been informed that Duke Power Company, not the vendor, is ultimately responsible for notifying the NRC in situations such as this.

4. The fact that the acceptance criteria were changed does not represent any weakness in the administrative procedures governing conduct of the test program. The potential for NRC notification was recognized and after reviewing the situation a decision was made that NRC notification was not necessary. Thus, there are no deficiencies in this particular area of the administrative procedures.

The Dynamic Rod Drop Test will be rerun to verify Westinghouse predictions that at least three out-of-four channels will trip. Until this test is rerun Westinghouse's interim rod withdrawal limits will be followed.

5. The Dynamic Rod Drop Test will be rerun at the next available outage, which is currently scheduled for Fall, 1982 (other testing is scheduled which will preclude rerunning this test during the June, 1982 outage).