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DUKE POWER

October 8, 1993

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

Subject: McGuire Nuclear Station, Units 1 and 2
Docket Nos. 50-369 and 50-370
NRC Inspection Report No. 50-369, 370/93-11
Violation 50-369, 370/93-11-01
Reply to a Notice of Violation

Gentlemen:

Enclosed is the response to the Notice of Violation issued August 9, 1993 concerning an inadequate preventative maintenance procedure for calibrating lake level instrumentation.

Should there be any questions concerning this response, contact Randy Cross at (704) 875-4179.

Very Truly Yours,

T. C. McMeekin

Attachment

xc: (w/attachment)

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McGuire Nuclear Station
Reply to a Notice of Violation

Violation 369, 370/93-11-01

During an Nuclear Regulatory Commission (NRC) inspection conducted on June 13, 1993 through July 17, 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February, 1978, which includes calibration of instrumentation and development of a preventative maintenance schedule.

Contrary to the above, the licensee had no specific procedure in place nor any preventative maintenance schedule developed for lake level instrumentation, which is used to monitor lake level for the purpose of entering the emergency plan.

This is a Severity Level IV (Supplement I) violation.

Reply to Violation 369, 370/93-11-01

1. Reason for the Violation:

Instrument loop 1MRCLT6480 (lake level) was not previously included in the station PM/PT program because it has not been designated as a safety-related instrument and the FSAR statement concerning a low water alarm system monitored in the Control Room was inadvertently overlooked. Until the subject inspection, there was no alarm in the Control Room for low lake level. The sole input for lake level to the Control Room is via the Unit 1 Operator Aid Computer (OAC).

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

- A. 1MRCLT6480 was repaired and a functional verification was performed on June 24, 1993. (Work Order # 93045023)
- B. Minor Modification 3765 was written, approved and implemented to place the computer point alarm (OAC point A0766) in service. Computer point A0766 will now alarm at 748' elevation decreasing.
- C. The location of the instrument was verified to insure isolation of an RC (Condenser Circulating Water) system bay would not isolate 1MRCLT6480 from the lake.
- D. 1MRCLT6480 was added to the station PM/PT program on July 27, 1993.
- E. A reading package (93-22-SRN) concerning the low lake level EAL was developed and covered with all operators (completed September 30, 1993).

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

McGuire Nuclear Station will submit a proposal to the NRC to alter the focus of the low lake level EAL from the lake to the Standby Nuclear Service Water Pond (SNSWP). The current EAL on the low lake level is in error and should have addressed low SNSWP level which is the assured ultimate heat sink. Technical Specification 3/4.7.5 bases states "The limitations on the SNSWP level and temperature ensure that sufficient cooling capacity is available either to: (1) provide normal cooldown of the facility, or (2) mitigate the effects of accident conditions within acceptable limits. The limitations on minimum water level and maximum temperature are based on providing a 30 day cooling water supply to safety-related equipment without exceeding their design basis temperature and is consistent with the recommendations of Regulatory Guide 1.27, "Ultimate Heat Sink for Nuclear Plants," March 1974."

Instrument loop OMRNLT6000 (SNSWP level) provides information to the Control Room staff in the form of a level gauge and two annunciator alarms (low and low-low level). This instrument loop is not safety-related but is included in the station PM/PT program which ensures yearly calibration. Additionally, the Control Room staff completes a required daily surveillance on the SNSWP level via the Control Room gauge.

The station's proposal will include basing the subject EAL on the SNSWP level rather than the lake level since the SNSWP is the assured ultimate heat sink. FSAR section 2.4.11 will be updated at the next periodic update to reflect the proposed changes. Annunciator response procedures associated with OMRNLT6000 (SNSWP level) will be changed to address the new EAL when the NRC grants approval of the proposal. If the NRC elects to not approve the proposal, the station will submit a revised violation response.

Additionally, Duke's three nuclear sites plan to submit their proposal concerning adoption of the NUMARC EAL methodology to the NRC by December 31, 1993. Full implementation of this methodology by the three sites is planned by June 30, 1994. This implementation includes complete upgrade training of all licensed SRO's to the new EAL's by June 30, 1994.

4. Date when full compliance will be achieved:

Pending NRC approval of the subject EAL proposal and implementation of the NUMARC EAL methodology, the station will be in compliance by June 30, 1994.