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DUKE POWER

July 26, 1994

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
Supplemental Reply to a Notice of Violation

Gentlemen:

As a result of implementing a new computerized method to track NRC commitments on June 28, 1994, a small number of overdue NRC commitments were identified which require supplemental responses to previously submitted Notice of Violation responses.

Enclosed is a supplemental response to the Notice of Violation issued August 9, 1993 concerning an inadequate preventative maintenance procedure for calibrating lake level instrumentation. The initial response to violation 369, 370/93-11-01 was submitted on October 8, 1993. A supplemental response was submitted on December 30, 1993 to change the submittal date for a proposal concerning adoption of the NUMARC EAL methodology. The revised commitment in the supplemental response stated the proposal would be submitted to the NRC by May 1, 1994 with full implementation no later than six months after NRC approval of the proposal. While we consider adoption of the NUMARC EAL methodology an enhancement to our existing program, this planned corrective action has been deleted from the attached supplemental response since it is not related to the Notice of Violation.

The supplemental response also committed to submit a proposal to the NRC to alter the focus of the low lake level EAL from the lake to the Standby Nuclear Service Pond. A more appropriate corrective action is to update the Final Safety Analysis Report (FSAR), section 2.4.11.6, Dependability Requirements, at the next periodic update to remove the reference to a low water level alarm system available to monitor the lake level. The only credible failure resulting in the lake level reaching 745 el. is an earthquake and procedure RP/0/A/5700/07, Earthquake Response, requires station operators to tour the site to evaluate the effects of an earthquake. This tour includes observing the condition of low level supply piping for the nuclear service water system. If low level supply piping is unavailable due to damage suffered during an earthquake, procedure RP/0/A/5700/07 directs station operators to refer to procedure AP/1,2/A/5500/20, Loss of Nuclear Service Water, to swap over nuclear service water suction to the standby nuclear service water pond.

These changes are reflected in the attached supplemental violation response. Should there be any questions concerning this response, contact Randy Cross at (704) 875-4179.

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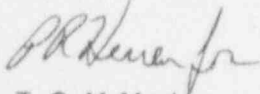
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U.S. Nuclear Regulatory Commission
July 26, 1994

Very Truly Yours,



T. C. McMeekin

Attachment

xc: (w/attachment)

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McGuire Nuclear Station
Supplemental 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 procedures 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:

FSAR section 2.4.11.6, Dependability Requirements, will be updated at the next periodic update to remove the reference to a low water alarm system available to monitor the lake level.

4. Date when full compliance will be achieved:

McGuire Nuclear Station is now in full compliance.