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DUKE POWER

August 31, 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, 370/93-05
Violation 50-370/93-05-01
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 May 3, 1993 concerning failure to report a manual ESF actuation. The initial response to violation 50-370/93-05-01 was submitted on June 2, 1993. An evaluation of current reportability guidance and methods, including a commercially available reportability determination system, has been performed. The commercial system evaluated was determined to be too generic, requiring customization for station use and the system was not cost beneficial. An evaluation of current reportability guidance determined that appropriate guidance is provided in Nuclear System Directive (NSD) 202, 10 CFR 50.72 Reports, but this guidance is not addressed in station procedure RP/0/A/5700/10, NRC Immediate Notification Requirements. These corrective actions were completed on July 21, 1994. Section 3 of the attached supplemental response addresses the planned incorporation of appropriate NSD 202 reporting guidance into station procedure RP/0/A/5700/10 by October 10, 1994.

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.

Very Truly Yours,

A handwritten signature in dark ink, appearing to read 'T. C. McMeekin'.

T. C. McMeekin

Attachment

060104

9409120182 940831
PDR ADOCK 05000369
Q PDR

Printed on recycled paper

JED

U. S. Nuclear Regulatory Commission
August 31, 1994

xc: (w/attachment)

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McGuire Nuclear Station
Supplemental Reply to a Notice of Violation

Violation 370/93-05-01

10 CFR 50.72 (b)(2)(ii) requires that a licensee notify the NRC as soon as practical and in all cases within four hours of the occurrence of any event or condition that results in a manual or automatic actuation of any engineered safety feature (ESF).

Contrary to the above, at 2:50 p.m. on March 22, 1993, a fitting on the Unit 2 Chemical and Volume Control System failed, causing a reactor coolant leak of approximately 75 gallons per minute. A manual actuation of a second charging pump, an ESF pump, was initiated to control pressurizer level. The manual actuation was not reported to the NRC until 4:10 p.m. on March 23, 1993.

This is a Severity Level IV (Supplement 1) violation applicable to Unit 2 only.

Reply to Violation 370/93-05-01

1. Reason for the violation:

The ESF actuation occurred in response to a primary system transient which necessitated the manual starting of a second charging pump to control pressurizer level. Control Room personnel failed to recognize that manually starting the second charging pump was considered a manual ESF actuation. Control Room personnel, in response to a 75 gallon per minute leak on the normal charging header, took corrective action as directed by the abnormal procedure for leakage within the capabilities of the charging pumps.

The Shift Supervisor directing activities in the Control Room during the transient made a conscientious effort to determine the reportability of this occurrence. The Shift Supervisor determined this transient not to be reportable based on the plant specific response procedure. The procedure states, in part, that a manual or automatic ESF actuation as a result of a valid signal is reportable. The Shift Supervisor was fully aware of plant conditions throughout the transient and was aware that had the leak not been isolated within fifteen minutes the station would have entered the Emergency Plan. The leak was isolated within the required time frame and no valid ESF signal occurred. However, the Shift Supervisor erred in determining that this event was not reportable.

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

- a. The immediate corrective action was to reemphasize the importance of reviewing all pertinent documentation prior to making a determination of reportability. The requirement to report the starting of the second charging pump is clearly stated in the Nuclear System Directive on reportability. The Shift Supervisor was unfamiliar with this directive and relied upon station specific procedures which were not sufficient to assure a proper reportability determination.

- b. An evaluation of current reportability guidance and methods, including a commercially available reportability determination system, was performed. The commercial system evaluated was determined to be too generic, requiring customization for station use and the system was not cost beneficial. An evaluation of current reportability guidance determined that appropriate guidance is provided in Nuclear System Directive (NSD) 202, 10 CFR 50.72 Reports, but this guidance is not addressed in station procedure RP/0/A/5700/10, NRC Immediate Notification Requirements. This corrective action was completed on July 21, 1994. Section 3 of this response addresses incorporation of NSD 202 reporting guidance into procedure RP/0/A/5700/10.

No similar events have occurred since implementation of these corrective actions.

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

The appropriate reportability guidance contained in Nuclear System Directive 202 will be incorporated into station procedure RP/0/A/5700/10. This corrective action will be completed by October 10, 1994.

4. Date when full compliance will be achieved:

McGuire Nuclear Station is now in full compliance.