



DUKE POWER

April 25, 1991

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

Subject: McGuire Nuclear Station
Docket Nos. 50-369, -370
SALP Report 50-369, -370/91-03
Duke Power Company Comments

Gentlemen:

By letter dated April 15, 1991, the NRC transmitted the Systematic Assessment of Licensee Performance (SALP) Report for McGuire Nuclear Station.

We appreciate the perspective offered by the NRC in this SALP Report and will utilize this input to further improve the quality of operations at McGuire Nuclear Station.

The SALP Report has been reviewed in an effort to assist management in focusing future actions and involvement in particular areas of station operation and support. As a result of our review of the SALP Report, we would like to make several comments. These comments are listed below in conjunction with the functional areas evaluated in the SALP Report.

Maintenance/Surveillance

On page 10 (first paragraph), the discussion of the painted diesel generators is incorrect. It was the Unit 1 (not Unit 2) diesel generators that were degraded by painting. We had previously (not subsequently) painted the Unit 2 (not Unit 1) diesel generators. These details are documented in LER 369/90-17.

Licensee Conferences Held during Appraisal Period

On page 22, the first two dates should be 1989, not 1990.

Marked-up pages from the SALP Report reflecting the above comments are attached.

Again, thank you for the opportunity to comment on this SALP Report.

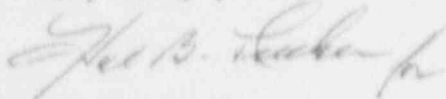
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Very truly yours,



M.S. Tuckman

LJR/s

Attachment

xc (W/Attachment):

Mr. S.D. Ebner
Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
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Atlanta, Georgia 30323

Mr. T.A. Reed
U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
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Mr. P.K. VanDoorn
NRC Senior Resident Inspector
McGuire Nuclear Station

During painting in the Unit ¹~~X~~ diesel generator rooms, the fuel racks on both diesel generators were inadvertently painted, rendering both diesel generators degraded for an extended period of time. This demonstrated a lack of controls while performing painting on safety related systems. The licensee ~~subsequently~~ ^{previously} painted the Unit ~~X~~ diesel generators, but exercised more control to prevent recurrence.

an event of this type 2

A violation was issued for the inadequate performance of a surveillance governing containment cleanliness when multiple instances were found where the containment did not meet TS requirements for cleanliness. In response, the surveillance procedure was rewritten and training was given to personnel who were assigned new responsibilities. During the subsequent refueling outage, the inspectors noted a dramatic improvement in the containment cleanliness.

During the SALP cycle, nine TS surveillances were missed. The majority of these were in the areas of radiation protection and operations and were either surveillances with a frequency of less than monthly or were surveillances that were required in response to some abnormal operating configuration. For surveillances with a frequency of weekly, or less, no master program existed for scheduling performance and tracking completion. The department responsible for performance of the test, was also responsible for scheduling and tracking. In response to the problems experienced during the SALP cycle, operations has improved the method used to track and schedule surveillances. Radiation protection surveillance problems mainly dealt with inadequate procedures and procedure adherence problems. A task force, made up of active radiation protection personnel who have had procedure writing training, are reviewing and revising the procedures to make them more thorough and more usable by the personnel. The periodic test program, which encompasses all of the surveillances with a frequency of monthly, or greater, has not had any missed surveillances during the assessment period.

Three violations were cited in this area.

2. Performance Rating

Category: 2(improving)

3. Recommendations

None

A Severity Level III violation with no CP was issued on August 16, 1990, involving the degradation of both Unit 1 Emergency Diesel Generators.

D. Licensee Conferences Held during Appraisal Period

- November 16, ¹⁹⁸⁹~~1990~~ - NRC/Duke interface meeting held at Catawba
- November 29, ¹⁹⁸⁹~~1990~~ - McGuire self-assessment meeting for previous SALP period held at McGuire
- January 9, 1990 - Meeting held at NRC headquarters to discuss Duke's corrective actions and plans in response to operating events at McGuire that represent precursors to an inter-system loss-of-coolant accident
- January 16, 1990 - NRC/Duke interface meeting held at Oconee
- January 30, 1990 - Meeting held at McGuire site to discuss the SALP Board assessment
- April 3, 1990 - Meeting held at NRC RII office to discuss the implementation of the security program at Duke sites
- June 18, 1990 - Meeting held at NRC headquarters to discuss operational safety and performance at McGuire
- July 16, 1990 - NRC/Duke Interface meeting held at Duke's Corporate office
- July 31, 1990 - Enforcement Conference held at NRC RII office to discuss the inoperability of both Emergency Diesel Generators event
- December 11, 1990 - NRC/Duke Interface meeting held at McGuire site
- February 4, 1991 - Duke's self-assessment presentation for McGuire current SALP period to NRC staff at a meeting in Region II office

E. Confirmation of Action Letters

None