

Duke Power Company
Nuclear Production Dept
P.O. Box 1907
Charlotte, N.C. 28201-1907

M.S. TUCKMAN
Vice President
Nuclear Operations
(704) 373-3851



DUKE POWER

April 25, 1991

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

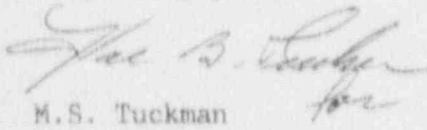
Subject: McGuire Nuclear Station
Docket Nos. 50-369, -370
Inspection Report No. 50-369, -370/91-06
Reply to a Notice of Violation

Gentlemen:

Pursuant to 10CFR 2.201, please find attached Duke Power Company's response to Violation 370/91-06-0 for McGuire Nuclear Station.

Should there be any questions concerning this matter, contact L.J. Rudy at (704) 373-3413.

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
101 Marietta St., NW, Suite 2900
Atlanta, Georgia 30323

Mr. T.A. Reed
U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
One White Flint North, Mail Stop 9H3
Washington, D.C. 20555

Mr. P.K. VanDoorn
NRC Senior Resident Inspector
McGuire Nuclear Station

9105070179 910425
PDR ADOCK 05000370
Q PDR



MCGUIRE NUCLEAR STATION
RESPONSE TO NOTICE OF VIOLATION

Violation 370/91-06-01

Technical Specification 6.8.1.a requires written procedures to be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Rev. 2, February, 1978.

Appendix A of Regulatory Guide 1.33, Section 9.a, states in part, that maintenance that can affect the performance of safety-related equipment should be properly preplanned and performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances.

Technical Specification (Tech Spec) 3.3.2 requires that with any of the eight Containment Pressure Control System channels inoperable, the inoperable channel is to be placed in the start permissive mode within one hour and the applicable action statement for the associated system, Containment Spray, or Containment Air Return/Hydrogen Skimmer, is to be applied.

Contrary to the above, on March 11, 1991, licensee procedure IP/O/A/3090/14, Tripping Inoperable Protection Channels, was not used to place the inoperable Containment Pressure Control System channels in the start permissive mode.

This resulted in the unit remaining outside of the Tech Spec action statement requirement for approximately six hours.

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

Response to Violation

1. Reason for Violation:

On March 11, 1991, Instrument and Electrical (IAE) personnel were performing PT/2/A/4201/05B, Unit Two Containment Pressure Control Analog Channel Operational Test (Train B). This PT requires a key operated control switch be rotated to the TEST position. This removes the containment pressure transmitter from the control circuit and engages a test circuit (similar to bypass condition). Once the test circuit is engaged the procedure requires that TEST POT be rotated clockwise until the specified start permissive lights illuminate, indicating that the channel is tripped.

While performing Section 12.4 of PT/2/A/4201/05B on loop 2NSPT5490 the alarm relays would chatter whenever TEST POT IA was rotated clockwise. To prevent damage to the alarm relays the IAE technicians rotated TEST POT IA full counterclockwise. The technicians then referred to Section 6.0, "Limits and Precautions"

of PT/2/A/4201/05B. Step 6.2 states "IF conditions other than those indicated by this procedure occur, STOP, AND notify IAE supervisor OR responsible IAE engineer". In the ensuing discussion with the IAE supervisor, it was recognized the test portion of the loop would need to be repaired. The IAE supervisor and the technicians informed Operations personnel the loop would need to be taken out of service for troubleshooting and repair. Operations asked the technicians to place the loop in the TRIP (start permissive) mode to comply with Tech Spec 3.3.2.

The IAE technicians believed the 2NSPT5490 loop was already in TRIP condition because the key operated control switch was rotated to the TEST position. They discussed this with the IAE supervisor and all agreed that IP/0/A/3090/14 was not needed to place the loop in TRIP (start permissive) condition and that Tech Spec 3.3.2 was satisfied.

2. Corrective Actions Taken and Results Achieved:

- A. 2NSPT5490 was placed in TRIP (start permissive) condition by applying a power source to the loop to energize the alarm relays (K1 and K2) and verifying VX A/R DAMPER PERMIT and H₂ SKIM VLV PERMIT lights were illuminated.
- B. The TEST circuit portion of loop 2NSPT5490 was troubleshot and a cracked solder joint was discovered on the connection at resistor R3. This solder joint was repaired and the loop was successfully tested per procedure PT/2/A/4201/05B. The control channel was then placed back in service and cleared from the TSAIL.
- C. The IAE personnel were counseled on taking inappropriate actions and the need to correctly follow procedures.
- D. ETQS Task 8109, Containment Pressure Control Analog Channel Op. Test, Study Guide was revised to require an explanation of the difference between a channel in TEST and a channel in TRIP.
- E. IAE personnel were requalified to ETQS Task 8109.

3. Corrective Actions to be Taken to Avoid Further Violations:

- A. IAE personnel will make appropriate revision to PT/2/A/4201/05B.
- B. IAE personnel reviewed similar loops on both units. As a result they will also make revisions to PT/2/A/4201/05A, PT/1/A/4201/05A, PT/1/A/4201/05B, IP/0/A/3050/05A (Containment Pressure Control Loop Calibration), IP/0/A/3090/14 (Tripping Inoperable Protection Channels), and PT/1/A/4201/01A and PT/2/A/4201/01A (RWST Level Automatic Switchover Analog Channel Operational Test).
- C. The IAE personnel involved will meet with each IAE crew to discuss this incident and clarify the differences of TRIP and TEST modes.

D. Systems training improvement plan:

The need to upgrade IAE systems training has already been identified as part of our ongoing evaluation of the IAE training program. Detailed, systematic analysis of systems is currently being performed to identify specific system related knowledge and skills. Part of this analysis involves prioritizing system training needs and developing a schedule for development and conduction.

Based on this incident, system training for the CPCS system will be identified as high priority for development and conduction. Analysis of training needs for the CPCS system will be completed by 9/1/91. This training will be developed and conducted for those technicians assigned this system by 9/1/92.

4. Dates when Full Compliance will be Achieved:

All procedure revisions will be completed by 7/1/91.

The crew discussion meetings will be completed by 9/1/91.

The CPCS training will be completed by 9/1/92.