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DUKE POWER

October 27, 1994

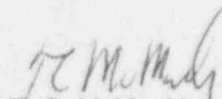
U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: McGuire Nuclear Station, Units 1 and 2
Docket Nos. 50-369 and 50-370
NRC Inspection Report No. 50-369, 370/94-18
Violation 50-369, 370/94-18-01
Reply to a Notice of Violation

Gentlemen:

Enclosed is a response to a Notice of Violation dated September 29, 1994 concerning failure to implement inservice testing. 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)

Mr. S. D. Ebnetter
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U. S. Nuclear Regulatory Commission
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Mr. George Maxwell
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McGuire Nuclear Station

Mr. Victor Nerses
U. S. Nuclear Regulatory Commission
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**McGuire Nuclear Station
Reply to a Notice of Violation**

Violation 50-369, 370/94-18-01

Technical Specification 4.0.5 requires inservice testing of ASME Code Class 1, 2, and 3 pumps and valves in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10 CFR 50.55a. The licensee specified the pumps and valves to be tested to meet these requirements and the test frequencies in the Unit 1 and 2 inservice testing program effective March 1, 1994.

Contrary to the above, on July 1, 1994, the licensee identified that inservice testing had not been implemented on about 55 pumps and valves which were specified to be inservice tested by the Unit 1 and 2 inservice testing program effective March 1, 1994. The licensee's identification of the failure to implement the testing was documented in McGuire Problem Investigation Process 0-M94-0756.

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

Reply to Violation 50-369, 370/94-18-01

1. Reason for the violation:

The reasons for the violation are unclear communication of management guidance and expectations in support of inservice testing implementation. As a result, McGuire Nuclear Station did not implement inservice testing for 58 valves and 6 pumps.

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

- a. On-line testing for affected Unit 1 components was completed prior to the 1EOC9 refueling outage which began on August 19, 1994. Outage testing for affected Unit 1 components was accomplished during the next refueling outage (1EOC9) after the March 1, 1994 effective date for testing program changes. Outage testing for affected Unit 1 components was completed on October 23, 1994 in compliance with Technical Specification 4.0.5 requirements.
- b. On-line testing for affected Unit 2 components was completed on October 19, 1994. Preparation activities to ensure Unit 2 outage testing will be conducted in accordance with Technical Specification 4.0.5 requirements were completed on October 3, 1994. The completion of Unit 2 outage testing is addressed in section 3.a of this response.

- c. Mechanical-Nuclear Systems Engineering management held team meetings with Systems Engineers to address increased management oversight of work activities, adherence to project completion schedules, use of project management tools and the sharing of experience among Systems Engineers. This corrective action was completed on October 18, 1994.
- d. Work process controls for the review of outstanding Problem Investigation Process (PIPs) and Project Leadership Action Network (PLAN) projects in Mechanical-Nuclear Systems Engineering were improved. This correction action was completed on October 8, 1994.
- e. The use of procedures, procedure changes and test program responsibilities were included in the Mechanical-Nuclear Systems, System Engineer position specific training program. This corrective action was completed on October 8, 1994.

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

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

- a. Outage testing for affected Unit 2 components will be completed by the end of the 2EOC9 refueling outage.

4. Date when full compliance will be achieved:

McGuire Nuclear Station is now in full compliance.