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DUKE POWER

February 2, 1995

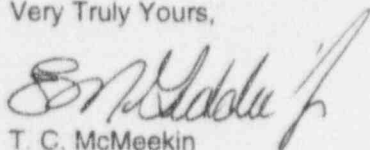
U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: McGuire Nuclear Station, Units 1 and 2
Docket Nos. 50-369 and 50-370
NRC Inspection Report No. 50-369, 370/94-26
Violation 50-369, 370/94-26-01, 369, 370/94-26-02
Reply to a Notice of Violation

Gentlemen:

Enclosed is a response to a Notice of Violation dated January 6, 1995 concerning failure to provide adequate procedures and administrative controls for S/G tube repair and failure to perform a VT-3 visual examination on reactor vessel internal surfaces. Should there be any questions concerning this response, contact Randy Cross at (704) 875-4179.

Very Truly Yours,

For 
T. C. McMeekin

Attachment

xc: (w/attachment)

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U. S. Nuclear Regulatory Commission
February 2, 1995

bx: (w/attachment)

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**McGuire Nuclear Station
Reply to a Notice of Violation**

Violation 50-369, 370/94-26-02

- A. Technical Specification 4.0.5 requires inservice inspections of ASME Code Class 1, 2 and 3 components to be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10 CFR 50, Section 50.55a (g). ASME Code Section XI, 1986 Edition, Table IWB-2500-1 requires that the Reactor Vessel interior, as defined under category B-N-1 be VT-3, be visually examined during each inspection period after the first 10 year interval.

Contrary to the above, on December 7, 1994, the licensee identified that this inspection, which was required to be performed during refueling outage 1EOC9, the last scheduled refueling outage of the first period of the second inspection interval had not been done.

This is Severity Level IV violation (Supplement I).

Reply to Violation 50-369, 370/94-26-02

1. Reason for the violation:

The examination was not performed due to a miscommunication between the Inservice Inspection Coordinator and the QA/QC Team Leader. When the QA/QC Team Leader was notified the inspection was required during the 1EOC9 refueling outage, the QA/QC Team Leader thought a mistake had been made in the ISI Plan for 1EOC9. The QA/QC Team Leader recalled the inspection had been performed during the 1EOC7 refueling outage but didn't realize the 1EOC7 outage was in the first ten year ISI inspection interval. The 1EOC9 refueling outage was in the first period of the second ten year interval and therefore, the inspection was required during the 1EOC9 refueling outage.

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

- a. Maintenance Execution Support personnel immediately originated work request 94048434 to perform an examination on the Unit 1 reactor vessel interior during the upcoming 1EOC10 refueling outage.
- b. Effective January 9, 1995, work orders are written for each required item number and identification number identified in the Inservice Inspection Plan for a specific outage. These work orders are tracked to completion.

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

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

- a. ISI pressure testing inspections will be described in a Maintenance Manual Directive. The Directive will address developing packages, scheduling and tracking inspections and the responsibilities of all station groups involved. This corrective action will be completed by August 1, 1995.
- b. Maintenance Procedure MP/O/A/7650/76, "Controlling Procedure for System Pressure Testing of ASME and ANSI Piping Systems", will be revised to include the initial review by the ISI Coordinator of the described area to be tested. This review will insure that all required inspection boundary testing is identified. This corrective action will be completed by March 15, 1995.
- c. The VT-3 examination will be performed during the 1EOC10 refueling outage.

4. Date when full compliance will be achieved:

McGuire Nuclear Station is now in full compliance.

Violation 50-369, 370/94-26-01

- B. 10 CFR Appendix B, Criterion V, as implemented by Duke Power Company Topical Quality Assurance Program (Duke 1-A), Amendment 16 & 17 Section 17.5, requires that activities affecting quality be performed in accordance with instructions appropriate to the circumstance.

Contrary to the above on September 20, 1994, the licensee discovered that a Steam Generator tubing, Replacement Plug had not been installed in Unit 1, S/G "D" tube R5-C90 due to weakness in administrative and implementing Procedures used to control this activity.

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

Reply to Violation 50-369, 370/94-26-01

1. Reason for the violation:

The reason for the violation is failure to follow procedures. Plugging procedure 1154835A, Revision 35, clearly states responsibilities and identifies QC controls to ensure this type of discrepancy is discovered and corrected prior to steam generators being declared operable. Contributing factors for the violation include a weakness in field procedures, multiple tube repair letters and insufficient communication during shift turnovers.

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

- a. PIP 1-M94-1260 and a Corrective Action Report by B&W Nuclear Technology (BWNT), CAR #94-3, were immediately issued.
- b. All vendor plugging task enclosures were immediately reviewed against Duke provided plugging letters to insure that all other plugs had been properly installed. No additional discrepancies were identified.
- c. Additional immediate corrective action included manual installation of a plug in location 5-90 and verification that the plug was in the correct tube.
- d. As a result of issuing PIP 1-M94-1260 and BWNT CAR #94-3, a thorough review of the plugging process was completed by both Duke Power and BWNT personnel. This review resulted in the corrective actions listed in NRC Inspection Report 50-369/94-26 and 50-370/94-26, pages 12 and 13. These corrective actions strengthen the control of steam generator tube plugging activities by insuring that plugging information is controlled on a single repair list and that the vendor has proper controls to insure the repair list is completed. The final review of vendor activities and verification of plugging remains a Duke Power responsibility that will be completed prior to placing steam generators inservice. All corrective actions specified in PIP 1-M94-1260 and BWNT CAR #94-3 have been completed and were used for control of this work activity during the 2EOC9 refueling outage.
- e. A group of experienced, knowledgeable individuals from Duke Power, BWNT and an independent consultant fully reviewed all aspects of steam generator maintenance

activities at Duke Power with special emphasis on Duke's interface with BWNT. This review was completed on October 31, 1994.

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

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

Implementation of approved recommendations resulting from the review of steam generator maintenance activities addressed in corrective action 2.e. will be completed by April 30, 1995.

4. Date when full compliance will be achieved:

McGuire Nuclear Station is now in full compliance.