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DUKE POWER

August 31, 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, 370/95-14
Deviation 50-369, 370/95-14-02
Reply to a Notice of Deviation

Gentlemen:

Enclosed is a response to a Notice of Deviation dated August 4, 1995 concerning failure to meet Generic Letter 88-14 commitments. 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)

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Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
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Mr. George Maxwell
Senior Resident Inspector
McGuire Nuclear Station

Mr. Victor Nerses
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U.S. Nuclear Regulatory Commission
August 31, 1995

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Duke Power Company's May 8, 1989, and December 2, 1991, responses to NRC Generic Letter (GL) 88-14, Instrument Air Supply Problems Affecting Safety Related Equipment, specified their actions to assure high quality air to air operated equipment and instruments at McGuire Nuclear Station. These actions included maintaining air quality within specified acceptance criteria, providing five micron end-use filters at safety related air operated equipment by the end of 1993, and implementing a two year preventative maintenance task for end-use filter replacement.

Contrary to the above, it was identified on June 23, 1995 that the licensee had deviated from the commitments in the May 8, 1989, and December 2, 1991, responses to GL 88-14. Air quality tests (Periodic Tests PT/1/B/4453/05 and PT/0/B/4453/04) conducted between 1990 and 1995 consistently demonstrated that the specified air quality acceptance criteria were not met. End-use five micron filters were not installed on safety related air operated dampers (AODs) and filters were not installed on all the designated air operated valves (AOVs). The preventative maintenance frequency for filter change was three years for AOVs and no filter changes were scheduled for AODs.

Reply to Deviation 50-369, 370/95-14-02

1. Reason for the deviation :

The reason for the deviation is Inappropriate Action. These commitments were not included into the commitment tracking process used in 1991. As a result, actions taken to improve air quality deviated from the 1991 commitments.

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

- a) The McGuire Nuclear Station Regulatory Compliance Manager emphasized to all Regulatory Compliance personnel the importance of ensuring that all NRC commitments are properly tracked as required by Nuclear System Directive (NSD) 214 entitled "Commitment Management Program". This corrective action was completed on August 30, 1995.
- b) The commitment management process was recently enhanced to provide an added assurance that commitments will be properly managed. Nuclear System Directive (NSD) 214 entitled "Commitment Management Program", implemented on June 14, 1995 provides criteria to effectively manage docketed regulatory commitments which includes commitment authorization, responsibilities, change management and ongoing compliance. In addition, the McGuire Problem Investigation Process (PIP) was recently enhanced to aid station personnel in managing commitments. These enhancements will help prevent recurrence of failure to properly track commitments.

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

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

- a) Five micron filters have been installed on all critical to operation air operated valves (AOVs) and all but twenty-three safety related AOVs. Five micron filters will be installed on the remaining twenty-three safety related AOVs by the end of the 2EOC10 outage.
- b) McGuire Engineering will evaluate all safety related AODs to determine if five micron filters should be installed and to determine the required PM's. These corrective actions will be completed by November 30, 1995. All required PM program changes will be completed by December 31, 1995.
- c) Based on the results of the corrective actions in section 3.b above, a supplemental response to Generic Letter 88-14 will be submitted by December 31, 1995.

4. Date when the corrective actions will be completed :

All corrective actions will be completed by the end of the 2EOC10 outage.