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**DUKE POWER**

June 15, 1992

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 2055

Subject: McGuire Nuclear Station, Units 1 and 2  
Docket Nos. 50-369 and 50-370  
Inspection Report No. 50-369, -370/ 92-11-02

Gentlemen:

NRC Inspection Report No. 50-369, -370/ 92-11-02 resulted in Violation 92-11-02, concerning implementation of the modification process. The original response dated June 18, 1991 stated that an addendum to that response would be submitted if further corrective actions were identified by an MSRG inplant review to be completed by 9/1/91.

That review was completed and resulted in additional corrective actions. Shortly after those recommendations were made, Duke Power reorganized to such an extent, that a new modification process needed to be developed. The MSRG recommendations were considered when the new NSM process was drafted.

The first draft of the modification process was completed May 28, 1992. A final document is expected by August 1, 1992 with full implementation by September 1, 1992.

Attached is a description of the event that led to the violation, and corrective actions to prevent future occurrences.

For questions please contact Larry Kunka at (704) 875-4032.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'T. C. McMeekin', written over a horizontal line.  
T. C. McMeekin

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xc: Mr. S.D. Ebner, Regional Administrator  
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Mr. Tim Reed, Project Manager  
U.S. Nuclear Regulatory Commission  
Office of Nuclear Reactor Regulation  
Washington, D.C. 20555

Mr. P.K. Van Doorn  
NRC Senior Resident Inspector  
McGuire Nuclear Station

**MCGUIRE NUCLEAR STATION  
RESPONSE TO NOTICE OF VIOLATION**

Violation 369/370/91-11-02

Technical Specification 6.8.1a requires written procedures to be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, which includes general plant operating and administrative procedures.

Operations Management Procedure (OMP) 1-11, operations Modification Implementation Process, requires control room drawings be red marked until final drawing updates are implemented upon implementation of modifications to assure that operators are aware of plant configuration.

Contrary to the above, operations personnel failed to follow OMP 1-11 relative to red marking the appropriate drawing for modification M6022264. This failure led to disabling of the diesel generator halon system when the breaker was opened for another modification.

This is a Severity level IV Violation applicable to Unit 2 only (Supplement I).

Response

1. Reason for Violation:  
Drawing was not red-marked because of confusion between OPS and Projects personnel wherein OPs personnel thought the work had not been completed yet.
2. Corrective actions taken and results achieved:  
The drawing was properly red-marked immediately upon discovery and a fire watch was established in the D/G room.
3. Corrective actions to be taken to avoid further violations:  
Following are each of the MSRG recommendations and corresponding actions.
  - 1) RECOMMENDATION  
Establish an independent formal review process for NSM packages; a formal follow-up to ensure the appropriate and necessary changes have been identified and implemented (procedures, training, database updated, appropriate drawings, and other programs.)

RESPONSE

An independent review by someone outside of the effected group may not be effective because the expertise about procedures, training, database updates, appropriate drawings, and other programs resides within the effected group.

Instead, rely on the technical expertise of sections to properly evaluate modification packages. Recent emphasis on procedural adherence and the following two recommendations will improve review accuracy.

2) RECOMMENDATION

Establish a formal departmental program defining individual and group responsibilities as applicable to the NSM Implementation Process.

RESPONSE

A new NSM manual has been drafted and will be implemented by September 1, 1992. The new manual combines several programs that previously were separate. It comprehensively explains the problem identification, design and implementation phases. It was developed and will be supported by three different station groups; System Engineering--Station Problem Reports (SPR)  
Component Engineering--Minor Modifications (MM)  
Project Management Group--Nuclear Station Modifications (NSM)

3) RECOMMENDATION

Station Superintendents and Projects Services Representatives should meet and discuss the needs of the affected stations groups in relation to the NSM Pre-Implementation Process and NSM Process, in general. During the review it was learned that there was no formal training given when the initial NSM Program was implemented.

RESPONSE

Training about the new NSM Manual is scheduled to begin in June 1992. All groups that are part of the modification process are expected to complete the training by September 1, 1992.

In addition to the above, the new process requires implementing procedures before functional testing instead of when declared operable.

4. Full compliance will be achieved by September 1, 1992.