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HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

December 10: 1984

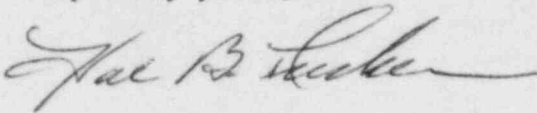
Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Subject: Oconee Nuclear Station
IE Inspection Report
Nos. 50-269/84-26
50-270/84-25
50-287/84-28

Dear Sir:

In response to your letter dated November 9, 1984 which transmitted the subject Inspection Report, the attached response to the cited item of non-compliance is provided. I declare under penalty of perjury that the statements set forth herein are true and correct to the best of my knowledge on December 4, 1984.

Very truly yours,



Hal B. Tucker

SGG:slb

Attachment

cc: Mr. J. C. Bryant
NRC Resident Inspector
Oconee Nuclear Station

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PDR ADDCK 05000269
Q PDR

VIOLATION

Technical Specification 6.4.1 states that the station shall be operated and maintained in accordance with approved procedures. QA Procedure QCK-1 requires that any personnel discovering a nonconforming item shall promptly initiate a nonconforming item report (NCIR) and that production personnel shall initiate NCIR's in accordance with Station Directives.

Contrary to the above requirements, although licensee personnel determined on or about September 5, 1984, that a Cuno filter in the low pressure service water supply line to high pressure injection pump coolers had been installed backwards, an NCIR was not written until September 24, 1984. Also, neither Station Directives nor the general employee training program address NCIR's.

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

RESPONSE

- 1) Admission or denial of the alleged violation:

This violation is correct as stated.

- 2) Reasons for the violation:

This violation resulted from an administrative deficiency. The Station Directive describing the processing of NCIR's did not include the provision that any person could initiate a NCIR. The directive referred to NCIR's being issued by the QA Group, thereby inferring that only the QA Group was responsible for the initiation of a NCIR. This ambiguity led to the delay in the initiation of the NCIR.

- 3) Corrective actions taken and results:

The Station Directive describing the processing of NCIR's has been deleted and replaced by a section in the Compliance Manual. This section includes the requirement that NCIR's may be initiated by any station personnel discovering items which do not conform with specifications, codes, design drawings, or other QA requirements.

In addition the Station Directive concerning Reporting has been revised to include the requirements that any personnel discovering a nonconforming item, shall promptly initiate a NCIR.

- 4) Corrective actions to be taken to avoid further violations:

None

- 5) Date when full compliance will be achieved:

The revisions to Station Directives noted in the corrective action described above were effective December 1, 1984.