

Duke Power Company  
Oconee Nuclear Generation Department  
P.O. Box 1439  
Seneca, SC 29679

J.W. HAMPTON  
Vice President  
(863)885-3499 Office  
(704)373-5222 Fax



DUKE POWER

November 18, 1992

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Subject: Oconee Nuclear Site  
Docket Nos. 50-269, -270, -287  
Inspection Report 50-269, -270, -287/92-23  
Reply to Notice of Violation

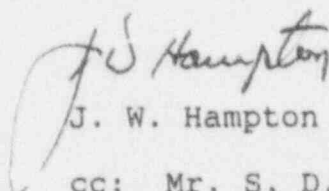
Dear Sir:

By letter dated October 20, 1992 the NRC issued a Notice of Violation as described in Inspection Report No. 50-269/92-23, 50-270/92-23, and 50-287/92-23.

Pursuant to the provision of 10 CFR 2.201, I am submitting a written response to the violation identified in the above Inspection Report.

I would like to note that this violation was not received by the site until November 2, 1992. Although the notice of violation was dated October 20, 1992, the postmarked date was October 27, 1992. I appreciate your attention to this matter in future reports.

Very truly yours,

  
J. W. Hampton

cc: Mr. S. D. Ebner, Regional Administrator  
U. S. Nuclear Regulatory Commission, Region II

Mr. L. A. Wiens, Project Manager  
Office of Nuclear Reactor Regulation

Mr. P. E. Harmon  
Senior Resident Inspector  
Oconee Nuclear Site

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VIOLATION 269,270,287/92-23-01, SEVERITY LEVEL IV

Oconee Technical Specification 3.6.5 requires that prior to criticality following refueling shutdown, a check shall be made to confirm that all manual containment isolation valves which should be closed are closed and tagged.

Oconee Technical Specification 3.6.1 requires that containment integrity be maintained whenever the RCS pressure is 300 psig or greater, and RC temperature is 200°F or greater, and nuclear fuel is in the core. Containment integrity is defined to exist when all non-automatic containment isolation valves and blind flanges are closed as required.

Contrary to the above, the above requirements were not met in that manual containment isolation valve 1N-107 remained in the open position from May 30, 1992, till September 8, 1992.

RESPONSE:

1. The reason for the violation, or, if contested, the basis for disputing the violation:

On May 29, 1992, PT/1/A/115/08, Reactor Building Containment Isolation and Verification, was initiated in preparation for startup. Enclosure 13 4, Outside Reactor Building Manual Isolation Valve Checklist Verification, includes verifying that 1N-107 is closed.

On June 2, 1992, the pressurizer was pressurized with nitrogen in accordance with OP/1/A/1103/02, Filling and Venting the Reactor Coolant System. This task required 1N-107 to be open in order to provide a flow path for nitrogen to the pressurizer. The procedure does not contain a step requiring the closure of 1N-107, and instead relies on PT/1/A/115/08 to close the valve prior to exceeding 200°F and 300 psig in the Reactor Coolant System.

The use of these procedures was directed by OP/1/A/1102/01, Controlling Procedure for Unit Startup, Enclosure 4.1, Unit Startup from Cold Shutdown to Reactor Coolant System Temperature and pressure of 250°F and 350 psig. This procedure allows parallel performance of PT/1/A/115/08, OP/1/A/1103/02, and the Pre-Heatup Checklist, a part of OP/1/A/1102/01.

The deficiency that existed in OP/1/A/1103/02 allowed 1N-107 to remain open after the heatup and pressurization of the plant made containment integrity necessary. The procedure should have contained a step to close the valve.

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

The immediate corrective action taken was to close 1N-107 to restore containment integrity.

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

Procedure OP/1,2,3/A/1103/02 will be revised to return 1N-107 to the closed position upon completion of the procedure.

Procedure OP/1,2,3/A/1102/01, Enclosure 4.1, will be revised to perform the Containment Integrity Checklist after the completion of procedures that affect manual Containment Isolation Valves.

4. The date when full compliance will be achieved:

Full compliance was achieved on September 8, 1992 when valve 1N-107 was closed.

The procedures will be revised prior to the completion of the next refueling outage for each unit:

Unit 1 EOC14 Refueling Outage (scheduled to begin 12/3/92)  
Unit 2 EOC13 Refueling Outage (scheduled to begin 4/14/93)  
Unit 3 EOC14 Refueling Outage (scheduled to begin 12/12/93)

In addition to the corrective actions listed under Item 3, operating procedures that position valves that are verified in Periodic Test (PT) procedures performed quarterly or prior to startup will be reviewed to ensure that the procedure returns the valves to the correct position as indicated in the verification PT. Procedure changes will be made, if necessary, based on this review. While this review cannot guarantee that a similar occurrence will never take place, it will lessen the likelihood of recurrence. This item will be tracked under LER 269/92-13.