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DUKE POWER

June 6, 1996

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, 370/96-02
Violations 50-369,370/96-02-01 and 50-369,370/96-02-02
Reply to a Notice of Violation

Gentlemen:

Enclosed is a response to a Notice of Violation dated May 9, 1996 concerning Violation 96-02-01, inadequate freeze protection procedures causing inoperability of FWST level transmitters and Violation 96-02-02, inoperability of an emergency diesel generator due to a design weakness and low ambient room temperature.

I declare under penalty of perjury that the statements set forth herein are true and correct to the best of my knowledge.

Should there be any questions concerning this response, contact Randy Cross at (704) 875-4179.

Very Truly Yours,


T. C. McMeekin

Attachment

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U. S. Nuclear Regulatory Commission
June 6, 1996

xc: (w/attachment)

Mr. S. D. Ebner
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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Violation 50-369,370/96-02-01

- A. Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained covering the activities in the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Contrary to the above, prior to February 1996 the licensee failed to provide procedures for the monitoring of freeze protection equipment and systems with sufficient guidance to assure that the Unit 2 refueling water storage tank level transmitters would not freeze and render the automatic swapover feature for the storage tank to the containment emergency core cooling system sump inoperable. Appendix A includes procedures for the operation of safety related systems such as those needed for emergency core cooling.

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

Reply to Violation 50-369,370/96-02-01

1. Reason for the violation:

The reason for the violation is lack of an explicit requirement to ensure proper operation of the FWST level transmitter panel strip heater/thermostats.

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

- a) Immediate corrective actions included notifying the control room SRO that the Channel 2 FWST level transmitter was inoperable, placing the Channel 2 FWST level instrumentation in the trip condition per procedure and increasing the ambient temperature in the Channel 2 FWST level transmitter panel by turning up the strip heater thermostat.
- b) Site management established a task force on February 13, 1996 to determine the actions needed to insure equipment requiring cold weather protection is adequately protected.
- c) A step was added to procedure IP/0/A/3050/13, RWST Class 1E Level Transmitter Calibration, to verify that the FWST level transmitter panel thermostats are set at 60 degrees F. or above. This corrective action was completed on March 14, 1996.
- d) A step was added to procedure IP/0/A/3050/13B, RWST Class 1E Level Transmitter Operability Verification, to verify that the FWST level transmitter panel thermostats are set at 60 degrees F. or above whenever the covers of the FWST level transmitter panels are opened. This corrective action was completed on April 15, 1996.
- e) On February 8, 1996, a function test was performed on the Channel 1 and 2 level transmitters and the transmitters operated properly. On April 25, 1996, a loop calibration was performed

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on the Channel 1 and 2 level transmitters to verify instrument set points were not affected. The results of the loop calibration indicated that the instruments were not affected by the low temperature.

- f) Minor modification (MGMM-8062) was implemented to add heat trace to a two foot section of piping on one channel for the Unit 2 FWST. This corrective action was completed on April 18, 1996.

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

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

- a) Minor modifications (MGMM-8205 for Unit 1) and (MGMM-8206 for Unit 2) will be implemented to add low temperature computer alarms for the FWST transmitter enclosures. This corrective action will be completed by December 1, 1996.
- b) Minor modification (MGMM-8062) will be implemented to add heat trace to a two foot section of piping on one channel for Unit 1. This corrective action will be completed by July 15, 1996.
- c) Steps will be added to the Cold Weather Preventative Maintenance (PM) procedure to require inspection of the FWST level transmitter panels. This corrective action will be completed by September 1, 1996.
- d) Engineering personnel will evaluate the adequacy of set point documentation and control of components in other non-safety related support systems. This corrective action will be completed by November 1, 1996.
- e) Reference corrective action 2.b, enhancements to Cold Weather Preventative Maintenance procedures will be implemented by November 1, 1996.

4. Date when full compliance will be achieved:

McGuire Nuclear Station will be in full compliance by December 1, 1996.

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Violation 50-369,370/96-02-02

- B. Technical Specification 3.8.1.1 requires that two separate and independent emergency diesel generators be operable in Modes 1, 2, 3, and 4 and if one of the diesel generators becomes inoperable it must be restored to operable status within 72 hours.

Contrary to the above, on at least two occasions between December 1995 and March 1996, with Unit 2 operating in Mode 1, the emergency diesel generator became inoperable due to a design weakness combined with low ambient temperature and was not restored to operable status within 72 hours.

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

Reply to Violation 50-369,370/96-02-02

1. Reason for the violation:

The reason for the violation is an ineffective root cause failure analysis of the previous emergency diesel generator 2A low lube oil (LD) pressure trips.

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

- a) Engineering personnel conducted a root cause failure analysis using the improved Failure Investigation Process (FIP). Corrective actions were identified to prevent recurrence (see 2.b,c,d and 3.a,b).
- b) The periodic maintenance tasks for flush and vent of the LD system pressure loops for all emergency diesel generators were changed from an annual to a quarterly frequency and improved guidance was added within the tasks to ensure proper venting. This corrective action was completed on March 11, 1996.
- c) Engineering personnel initiated periodic testing of the LD system impulse lines on all emergency diesel generators. This was completed on March 6, 1996.
- d) Nuclear Station Modification 22473 was implemented during the 2EOC10 refueling outage to shorten the impulse lines and move the LD pressure instrumentation for Unit 2 emergency diesel generators.

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 violations:

- a) Nuclear Station Modification 12473 will be implemented during the 1EOC11 refueling outage to shorten the impulse lines and move the LD pressure instrumentation for Unit 1 emergency diesel generators .
- b) Engineering personnel will evaluate the results of the modifications on LD system performance and adjust the frequency of periodic testing and periodic flush and vent maintenance tasks accordingly. This corrective action will be completed by May 1, 1997.

4. Date when full compliance will be achieved:

McGuire Nuclear Station will be in full compliance by May 1, 1997.