

DUKE POWER COMPANY

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15 MAY 1 1985 01
April 19, 1985

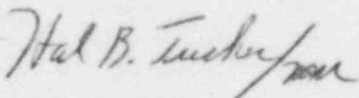
Dr. J. Nelson Grace, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Subject: Oconee Nuclear Station
IE Inspection Report
Nos. 50-269/84-16
50-270/84-15
50-287/84-26

Dear Sir:

By letter dated March 20, 1985, NRC/Region II requested a supplemental response relative to the Duke response of December 21, 1984 to the notice of violation identified in the subject inspection report issued by a November 23, 1984 letter. In response, please find attached the requested supplemental response.

Very truly yours,



Hal B. Tucker

PFG:slb

Attachment

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

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Q PDR

IE01

VIOLATION 1

NRC Order 7590-1 July 10, 1981 to Oconee, Order Confirming Licensee Commitments On Post TMI Related Issues, requires certain TMI items to be implemented. Item 1.A.1.2, (Delegating Administrative Shift Supervisor Responsibilities to Non-on Duty Personnel), is listed in the order as having been completed.

Contrary to the above, as of September 14, 1984, the administrative duties of the Shift Supervisor are delegated to the Unit Supervisors and control room Senior Reactor Operators (SROs) who are on duty in the control room.

This is a Severity Level IV violation (Supplement I) applicable to units 1, 2, and 3.

ADDITIONAL RESPONSE

1) Admission or denial of the alleged violation:

This violation is denied for the reasons given below.

2) Reasons for the denial of alleged violation:

Duke agrees with the NRC/Region II specific comments provided in the letter dated March 20, 1985 regarding the intent of NUREG-0578 to prevent distraction of the Shift Supervisor by administrative duties. In addition, Duke acknowledges the correctness of the excerpt from NUREG-0578 that was quoted in the Staff Assessment of Duke's denial of Violation 1.

By letters dated October 18, 1979; November 21, 1979; and January 2, 1980, Duke Power made certain commitments in response to Section 2.2.Ia of NUREG-0578. In response to these submittals the NRC by a letter dated April 7, 1980, provided the Staff's evaluation.

Based upon a review of these correspondences and of the commitments made, Duke contends that the NRC/Region II has not provided any evidence indicating that Duke has violated any of its commitments that were made in response to this section of the NUREG. Duke respectfully reminds NRC/Region II that the specifics set forth in NUREG-0578 are not binding Regulatory Requirements as are the commitments made in response to the NUREG.

Duke has initiated certain actions in response to the concerns expressed by the inspection team and by the NRC/Region II Staff during an April 7, 1985 conference call. Duke is currently revising OMP-2-1 which defines the responsibilities of the Reactor Operator (RO) on the control board, the SRO in the control room and the STA. This action should not be interpreted to mean an admission to the occurrence of the alleged violation.

VIOLATION 2

Oconee Technical Specification Figure 6.1-1, Station Organization Chart, requires the Shift Technical Advisor (STA) to report to the Operating Engineer and to advise the Shift Supervisor.

Contrary to the above, as of September 14, 1984, Oconee Station Directive 3.1.36, revision dated January 18, 1984, requires the SRO/STA to report to the Shift Supervisor on items pertinent to normal operations and to perform the normal line function in SRO in charge of the control room.

This is a Severity Level IV violation (Supplement I) applicable to units 1, 2, and 3.

ADDITIONAL RESPONSE

1) Admission or denial of the alleged violation:

This violation is correct as stated:

2) Reasons for the violation:

The requirements for a STA was established by NUREG-0578 and clarified by two NRC letters, dated September 13, 1979 and October 30, 1979, to all operating Nuclear Power Plants. Additional clarification was provided by NUREG's 0660 and 0737. By a letter dated July 9, 1982, the NRC Staff gave interim acceptance to Oconee's STA program, with final acceptance being withheld because some of the STA candidates didnot have a Bachelor's Degree or equivalent in a scientific or engineering discipline.

From 1982 through 1985 negotiations took place between the NRC Staff and Duke concerning the STA program at Oconee. A NRC letter dated March 7, 1985, which approves Oconee's upgraded STA program, was issued as a result of these negotiations. The Safety Evaluation transmitted by the March 7, 1985 letter stated that; "The implementation date for the upgraded Oconee STA program is September 1, 1985. The current program will remain in effect until then."

During the discussions preceeding the March 7, 1985 letter, Duke made certain commitments concerning the interim STA program for Oconee. Based upon Duke's understanding of the commitments made, the combining of the SRO/STA function was in compliance with these commitments. Duke didnot unilaterally and without informing the NRC modify the interim STA program.

Duke acknowledges, based upon review of correspondences, that the NRC may have misunderstood how the interim STA program is structured. Please note that no attempt was made to mislead the NRC concerning the interim program. Specifically, the correspondences didnot, in no uncertain terms, explicitly describe the STA program.

3) Corrective action taken and results:

During an off-normal event the STA function will be performed by a unit supervisor from a unit other than the transient unit. In addition, the STA shall report directly to the projects operating engineer on items pertinent to the STA function. This will ensure that, during off-normal events, the STA will be detached and independent of the normal line function of shift operation and act as an advisor to the Shift Supervisor.

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

- a) Operations Management Procedure 2-1, which defines the duties of the RO on the Control Board, the SRO in the Control Room, and the STA is being revised. The responsibilities of the STA will be delineated within this procedure.
- b) Implementation of the upgraded STA program as accepted by the NRC in the March 7, 1985 letter.

5) Date when full compliance will be achieved:

- a) Revision to OMP 2-1 will be completed by May 1, 1985.
- b) The upgraded STA program will be implemented by September 1, 1985.

VIOLATION 3

NRC Order 7590-01, Order Confirming Licensee Commitments On Post TMI Related Issues, Item I.A.1.3, Shift Manning, requires administrative procedures be established for the placement of overtime restrictions on plant staff who perform safety-related functions (e.g., senior reactor operators, reactor operators, health physicists, auxiliary operators, I&C technicians and key maintenance personnel).

Contrary to the above, as of September 14, 1984, Oconee Station Directive 3.1.33, revision dated January 23, 1984, does not contain provisions for limiting overtime for health physicists and key maintenance personnel.

This is a Severity Level IV violation (Supplement I) applicable to units 1, 2, and 3.

ADDITIONAL RESPONSE

By the NRC/Region II letter dated March 20, 1985, this violation was withdrawn; however, it was requested that Duke provide a description of the actions planned in response to the NRC/Region II comments relative to this item. The subsequent paragraph provides a description of the action taken to ensure that overtime restrictions for all plant Staff who perform safety-related functions are consistent with the requirements of NUREG-0737, Item I.A.1.3.

Please find enclosed, for your information, a copy of Oconee Nuclear Station Directive 2.1.5 which prescribes a program for controlling excessive working hours of station personnel. This directive applies to all personnel performing work at Oconee.

Oconee Nuclear Station Directive 2.1.5

Approval M. J. Tuckman

Original Date 12/1/81

Revised Date —

DUKE POWER COMPANY

OCONEE NUCLEAR STATION

LIMITING WORK HOURS

INFORMATION ONLY

1.0 Purpose

Prescribe a program for controlling excessive working hours of station personnel.

2.0 References

- 2.1 Technical Specification 6.4.3 (Proposed)
- 2.2 NUREG 0737, Clarification of TMI Action Plan Requirements (Item I.A.1.3)
- 2.3 NRC Generic Letter 82-12, Nuclear Power Plant Staff Working Hours, June 15, 1982
- 2.4 IE Circular 80-02, Nuclear Power Plant Staff Working Hours, February 1, 1980

3.0 Applicability

This directive applies to all personnel performing work at the Station.

4.0 Responsibilities

- 4.1 It is the responsibility of each individual to maintain his or her work hours within the below noted guidelines. If a situation exists or develops which will require deviation from the guidelines, each individual must notify his or her supervision.
- 4.2 Supervisory personnel are responsible for controlling the work hours of their personnel within the below noted guidelines. Supervisory personnel are also responsible for obtaining the appropriate approvals to authorize deviation from the guidelines.

5.0 Guidelines

- 5.1 Second level management, i.e., Coordinators, Shift Supervisors, Support Engineers authorize their employees to work in excess of 80 hours for each employee in any two (2) week pay period not to exceed 100 hours.
- 5.2 Section Heads may authorize their employees to work in excess of 100 hours for each employee in any two (2) week pay period not to exceed 120 hours.
- 5.3 Superintendents may authorize their employees to work in excess of 120 hours for each employee in any two (2) week pay period. The Station Manager will be informed of this authorization.
- 5.4 The following requirements are applicable to employees performing safety-related (QA Condition 1) work. For the purposes of these requirements, safety-related work is defined as the performance of safety-related functions pursuant to "A" designated procedures. Examples of personnel who perform safety-related functions would be Senior Reactor Operators, Reactor Operators, Nuclear Equipment Operators, certain Maintenance personnel, etc.
 - 5.4.1 Except as allowed in 5.4.2 working hours shall be limited as follows:
 - a. An individual shall not be permitted to work more than 16 hours straight (excluding shift turnover time).
 - b. An individual shall not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any seven day period (all excluding shift turnover time).
 - c. A break of at least eight hours shall be allowed between work periods (including shift turnover time).
 - d. Except during extended shutdown periods, the use of overtime shall be considered on an individual basis and not for the entire staff on shift.
 - 5.4.2 A deviation from 5.4.1 shall be approved by the Station Manager (or designee). This approval shall be documented with the basis for granting the deviation. Routine deviation from 5.4.1 is not authorized.

- 5.4.3 Time sheets (non-exempt personnel) will be reviewed to assure conformance with 5.4.1. Supplemental pay records for exempt personnel will be reviewed to assure conformance with 5.4.1. Supervisory personnel are hereby designated to perform this review.

6.0 Documentation

- 6.1 No documentation is required for items 5.1, 5.2, and 5.3.
- 6.2 Documentation associated with 5.4.2 will be maintained available for NRC review for a period of two (2) years.