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September 13, 1985

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

Subject: McGuire Nuclear Station
Docket Nos. 50-369, 50-370

Reference: RII:WTO
NRC/OIE Inspection Report 50-369/85-23, 50-370/85-24

Dear Dr. Grace:

Pursuant to 10 CFR 2.201, please find attached responses to violations which were identified in the above referenced Inspection Report.

Very truly yours,

H.B. Tucker /WSS

Hal B. Tucker

WHM/hrp

Attachment

cc: Mr. W. T. Orders
NRC Resident Inspector
McGuire Nuclear Station

IE01 1/1

Duke Power Company
McGuire Nuclear Station
Responses to Violations in IE Inspection Report
50-369/85-23 and 50-370/85-24

Violation 369/85-23-01, Severity Level IV

Technical Specification (TS) 4.9.2 requires, for mode 6 operation, that each source range neutron flux monitor be demonstrated operable by the performance of an analog channel operational test within 8 hours prior to initial core alterations and at least once per 7 days.

TS 4.0.4 decalares that entry into an operational mode shall not be made unless the surveillance requirement associated with the limiting condition for operation have been performed within the stated surveillance interval.

Contrary to the above:

a. On May 1, 1985, Unit 1 entered mode 6 without performing an analog channel operation test on the source range monitors within the previous seven days.

b. On May 6, 1985, Unit 1 core alterations were begun without performing an analog channel operational test on the source range monitors within the previous eight hours.

Response:

1. Admission or denial of the alleged violation:

   Duke Power agrees that the violation occurred as stated.

2. Reasons for the violation:

   This violation occurred due to an administrative/Procedural Deficiency. Details of this event were submitted to the NRC on June 26, 1985 in Licensee Event Report (LER) 369/85-14.

3. Corrective steps which have been taken and the results achieved:

   As soon as this error in testing was identified, the source range neutron flux monitors were tested.

4. Corrective steps which will be taken to avoid further violations:

   Details of corrective action are described in LER 369/85-14. These include development of a controlling procedure for entry into Mode 6, development of methods to ensure that surveillance requirements are met and inclusion of surveillance requirement scheduling in the Outage Scheduling Computer Program.

5. Date when full compliance will be achieved:

   Corrective actions will be completed prior to the next refueling outage. McGuire Nuclear Station is presently in full compliance.

Violation 369/85-23-02, 370/85-24-03, Severity Level IV

Technical Specification 6.8.1.a requires that current written approved procedures be established, implemented and maintained covering those surveillance tests required by Technical Specifications. Implicit in the provisions of these requirements is the requirement that the procedures embody sufficient detail to facilitate the successful accomplishment of the task.

Contrary to the above:

a. On July 12, 1985, during the performance of a manual reactor trip surveillance test, the applicable procedure, PT-2-A-4600-56, Manual Reactor Trip Functional Test, was not followed in that the feedwater isolation reset switches were not depressed while tripping reactor trip breaker as required. This resulted in an inadvertent feedwater isolation.

b. On July 12, 1985, during the performance of test PT-0-A-4601-08A, Solid State Protection System Train A, the procedure was inadequate in detail in that it did not specify the deactivation of the P-4 permissive prior to closing the reactor trip breaker. This resulted in an inadvertent feedwater isolation.

c. On May 6, 1985, a shift supervisor erroneously signed step 6.5 on Enclosure 13.1 of Unit 1 procedure MP-1-A-7150-41, Control Rod Drive Shaft Latching and Unlatching, which stated that applicable surveillance requirements of TS 3.9.2 has been met. The surveillance had not been performed. This in turn led to a mode change without completing prerequisites required by TS 4.0.4.

Response:

1. Admission or denial of the alleged violation:

   Duke Power agrees that the violation occurred as stated.

2. Reasons for the violation:

   The ESF signal (described in part a) occurred when a reactor trip breaker was opened without blocking the main feedwater isolation signal. This actuation was attributed to a personnel error because a feedwater isolation reset button was not depressed when a reactor trip breaker was opened. The ESF signal (described in part b) occurred when a reactor trip breaker tripped open during testing of the solid state protection system. This actuation was attributed to a procedural deficiency because adequate test prerequisites were not in place to prevent the ESF actuation. Details of these events were submitted to the NRC on August 12, 1985 in Licensee Event Report (LER) 370/85-20.

   Part c of this violation occurred due to a personnel error when a shift supervisor signed off a procedure judging that a surveillance requirement had been met. Details of this event are contained in LER 369/85-14.

3. Corrective steps which have been taken and the results achieved:

   Corrective steps taken following parts a and b of the violation consisted of reseting the main feedwater isolation signals and returning valve alignments to the normal positions.

   Part c corrective steps consisted of testing the source range neutron flux monitors.

4. Corrective steps which will be taken to avoid further violations:

   Planned corrective actions for parts a and b are as follows:

   1. The procedure "Solid State Protection System (SSPS) Train A Periodic Test Above NC System Pressure of 1955" now includes adequate prerequisites to prevent an inadvertent ESF actuation. Other SSPS IAE procedures were reviewed and revised as needed to minimize the chance of generating an inadvertent ESF Actuation.
   2. This incident will be reviewed with shift personnel to discuss the standard operating practice when opening the reactor trip breakers.

   Details of corrective actions for part c are described in LER 369/85-14.

5. Date when full compliance will be achieved:

   Discussions with personnel will be completed by November 1, 1985. Part c corrective steps will be completed prior to the next Unit 1 refueling. McGuire Nuclear Station is presently in full compliance.

Violation 370/85-24-02, Severity Level IV

10 CFR 50, Appendix B, Criteria XVI as implemented by Duke Power Company Topical Report, Quality Assurance Program Duke-1-A, Amendment 7, Section 17.2.16 requires that conditions adverse to quality be promptly identified and corrected.

Contrary to the above, on May 22, 1985, a QC inspector discovered a violation of the electrical separation of certain Unit 2 safety related cable yet no corrective action was taken until May 28, 1985.

Response:

1. Admission or denial of the alleged violation:

   Duke Power agrees that the violation occurred as stated.

2. Reasons for the violation:

   This violation occurred due to a lack of communication between Quality Assurance personnel and Instrumentation and Electrical (IAE) personnel where problem identification and correction were concerned.

3. Corrective steps which have been taken and the results achieved:

   A QA inspector found a cable tray problem on May 22, 1985 and identified the problem to IAE personnel. A Non-conforming Incident (NCI) was not issued at that time because the inspector did not know if there was ongoing activity to cause the removal of the Electray Support. The problem was therefore referred to IAE to research. Until it is established that the support was removed without authorization a non-conforming situation does not exist. Follow-up by the QC inspector concluded that no action had been taken and the NCI was generated as a result.

4. Corrective steps which will be taken to avoid further violations:

   Designated contacts have been established within IAE for situations such as this. This event has been covered with QA inspectors and IAE personnel in crew meetings.

5. Date when full compliance will be achieved.

   McGuire Nuclear Station is presently in full compliance.