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May 17, 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 and 50-370

Reference: RII:WTO
NRC/OIE Inspection Report 50-369/84-20 and 50-370/84-17

Dear Dr. Grace:

Pursuant to 10 CFR 2.201, please find attached a response to violation 50-369/84-20-01, 50-370/84-17-01 which was identified in the above referenced inspection report.

Very truly yours,

H.B. Tucker /BS

H. B. Tucker

PBN/mjf

Attachment

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

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IE01

DUKE POWER COMPANY

McGuire Nuclear Station
Response to NRC/OIE Inspection Report No. 50-369/84-20 and 50-370/84-17

Violation 50-369/84-20-01, 50-370/84-17-01, Severity Level IV (Supplement I):

Technical Specification, Section 6.8.1, states that written procedures shall be established, implemented, and maintained covering the procedures recommended in Appendix A of Regulatory Guide 1.33. Regulatory Guide 1.33 recommends written procedures covering the (1) plant fire protection program, (2) plant operating and shutdown procedures, and (3) procedures for surveillance and maintenance of systems which can affect the performance of safety-related equipment.

Contrary to the above, failure to perform periodic surveillance tests resulted in portions of the Standby Shutdown System (SSS) not always being maintained fully operational in that:

a. The operability test of the Unit 1 standby makeup pump, which is a component of the SSS and provided for reactor coolant system makeup should the normal charging system be unavailable, was not conducted to verify system operability between April 28, 1983, and April 25, 1984, as required by Procedure PT/1/A/4209/0/1C (sic.-PT/1/A/4209/01C), Standby Makeup Flow Periodic Test (Unit 1 only).

b. The Unit 2 spent fuel pool water supply available to the Unit 2 standby makeup pump was not checked to verify that boron concentration was greater than or equal to 2000 parts per million (ppm) between March 1, 1984, and September 5, 1984 (Unit 2 only).

c. Procedure requirements for periodic surveillance inspection and tests of the SSS diesel generator starting batteries were not initiated until November 11, 1983 (Unit 1 only).

d. The verification procedure to periodically determine viscosity, water and sediment in diesel fuel from the SSS diesel generator fuel storage tanks had not been issued at the time of this inspection (Units 1 and 2).

e. The procedure for periodic major inspection and maintenance of diesel engine for SSS generator to assure system reliability had not been issued at the time of this inspection (Units 1 and 2).

f. Procedure requirements of McGuire Periodic Maintenance Program for calibration of SSS instrumentation devices for reactor coolant pressure, pressurizer level, steam generator level and incore thermocouples were not adhered to for Unit 1. The time between calibration was 36 months for reactor coolant pressure, 35 months for steam generator level devices, and 31 months for incore thermocouples in lieu of the specified 18 months (Unit 1 only).

Response:

1. Admission or denial of the alleged violation:

Duke Power Company agrees that the violation occurred as stated.

2. Reasons for the violation if admitted:

As indicated in Mr. H. B. Tucker's (DPC) September 10, 1984 letter to Mr. J. P. O'Reilly (NRC/OIE), the pre-operational acceptance testing of Standby Shutdown Facility (SSF) components was successfully completed by January 1983 for Unit 1 and prior to Licensing for Unit 2. The SSF was thus considered operable by 2 years after Unit 1 fuel load as required by license conditions. Periodic surveillance was initiated after January 1983 on SSF components. However, due to insufficient guidance being available to the station as to what testing (and appropriate intervals) was required with regard to the SSS, all necessary periodic surveillance testing procedures were not implemented and/or the testing intervals of the procedures were not adhered to to the degree appropriate. Additional information is available in the above referenced September 10, 1984 letter.

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

Although a surveillance program of SSS components was in place on each unit, Duke had identified similar concerns prior to the inspection and initiated corrective actions. A proposed McGuire Standby Shutdown System technical specification (3/4.7.14) was developed and submitted to the NRC (Ref. Mr. H. B. Tucker's letter to Mr. H. R. Denton (NRC/ONRR) dated September 7, 1984) which provides the operability and surveillance requirements for the Standby Shutdown System. This proposed SSS technical specification, including surveillance requirements and compensatory actions, was administratively implemented effective August 16, 1984 via Mr. M. D. McIntosh's (DPC) memo of the same date, and will be applicable until an NRC approved version is issued. This technical specification's surveillance requirements cover all the periodic surveillance tests addressed in examples a-f of this violation. Following implementation of the proposed technical specification additional procedures were written as necessary and it was ensured that identified technical specification surveillance requirements are met within the required intervals (additional information with regard to procedures is available in the above referenced September 10, 1984 letter). Testing in accordance with the proposed technical specification has been successfully performed since its implementation. In addition, as indicated in the above referenced September 10, 1984 letter, even in light of discrepancies noted for the McGuire SSF periodic surveillance program performed since April 1983 it is considered that the SSF would have been able to perform its intended function at all times with the exception of the times the SSF diesel generator was inoperable. Note that a supplement to this proposed technical specification was submitted by Mr. H. B. Tucker's April 9, 1985 letter to Mr. H. R. Denton; however, Duke is only committed to meet the requirements of the original (September 7, 1984) submittal until formal NRC approval of the SSS technical specification.

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

Formal approval and issuance by NRC of proposed technical specification 3/4.7.14 will further ensure appropriate surveillance testing is performed, and that the testing is performed at required intervals.

5. Date when full compliance will be achieved:

Full compliance with Technical Specification and regulatory guide requirements in this area was achieved on August 16, 1984 upon implementation of proposed Technical Specification 3/4.7.14.