

DMB

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October 11, 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. 50-269/85-21
50-270/85-21
50-287/85-21

Dear Dr. Grace:

In response to your letter dated September 13, 1985 which transmitted the subject Inspection Report, the attached response to the cited items of non-compliance is provided.

Very truly yours,

H.B. Tucker
Hal B. Tucker

SGG:slb

Attachment

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

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Violation 1

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality be performed in accordance with instructions, procedures, or drawings. Station Directive 2.2.1 implements the requirements of 10 CFR 50, Appendix B, Criterion V in that it requires activities to be conducted in accordance with the provisions of the applicable procedure.

Station Directive 4.5.4 defines how to use the Quality Standards Manual for Structures, Systems, and Components in the determinations of QA condition classifications on maintenance work requests, material requisitions and procedures. This Directive states in part that "the Quality Standards Manual for Structures, Systems, and Components shall be used to determine QA condition level." The Quality Standards Manual for Structures, Systems, and Components (QSMSSC) identifies Power Range Nuclear Instruments as safety-related.

Contrary to the above, Work Request No. 22790B dated July 17, 1985, was not classified as safety-related in accordance with the Quality Standards Manual for Structures, Systems, and Components. Consequently, the work request had not been reviewed by the Station QA Section.

This violation is applicable to Unit 1 only.

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

Response

- 1) Admission or denial of the alleged violation:

This violation is correct as stated.

- 2) Reasons for the violation:

This violation was a result of misinterpreting the procedures which control the process of determining whether a component is safety-related or not.

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

Personnel in Operations that are responsible for classifying safety-related work activities have all received training in the procedures that controls this process. This was on-shift training within the Operations group and was completed by September 23, 1985. In addition, the specific individuals were counseled regarding their errors in this matter.

This training and counseling was beneficial in clearing up misunderstandings concerning the procedures used in this process.

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

All Operations Supervisory personnel that are designated Qualified Reviewers are receiving in-house training from the Compliance Section that includes the subject of classification of safety-related systems and components.

The training noted in (3) and (4) should preclude further violations.

- 5) Date when full compliance will be achieved:

The training noted in (4) above will be completed by December 31, 1985.

Violation 2

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Station Directive 2.2.1 provides requirements for procedure preparation, use, and adherence.

Contrary to the above, Procedure MP/O/A/2001/4 did not contain vendor recommendations such as acceptance criteria for drop out voltage, room temperature limits, and test trips. In addition, the maintenance procedure was not being strictly adhered to during maintenance of reactor trip breakers.

This violation is applicable to Units 1, 2, and 3.

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

Response

- 1) Admission or denial of the alleged violation:

This violation is correct as stated.

- 2) Reasons for the violation:

This violation was a result of inadequate use of G.E. Advisory Letters and an insufficient technical review of procedure MP/O/A/2001/4.

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

A review of procedure MP/O/A/2001/4 is currently in progress. The procedure has already been reviewed against the inadequacies detailed in the subject report. A planned resolution for each inadequacy identified has been developed. In addition the review will verify that all G.E. recommendations are incorporated. Any recommendations not incorporated will be approved by G.E. and reasons for not incorporating these recommendations will be documented.

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

Implementation of the necessary procedure changes identified in the review noted in (3) above and a review of the procedure by all appropriate personnel involved with the CRD breaker maintenance program should preclude further violations.

- 5) Date when full compliance will be achieved:

All actions noted in (3) and (4) above will be implemented by January 1, 1986.