

## NOTICE OF VIOLATION

Duke Power Company  
Oconee Nuclear Station  
Units 1, 2, and 3

Docket Nos. 50-269, 50-270, 50-287  
License Nos. DPR-38, DPR-47, DPR-55  
EA 91-049

During an NRC inspection conducted on March 12 - 15, 1991, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violations are listed below:

- A. Technical Specification 6.4.1 requires that the station be operated and maintained in accordance with approved procedures. It also states that written procedures with appropriate check-off lists and instructions be provided for preventive or corrective maintenance which could affect nuclear safety or radiation exposure to personnel.

Maintenance Procedure MP/O/A/1800/105, Reactor Building Emergency Sump Low Pressure Injection Suction Line Flange Installation, Removal and Screen Inspection, approved on August 2, 1990, provides guidance for the installation and removal of the Reactor Building Emergency Sump Low Pressure Injection suction line flange and sump screen inspection. Sections 6.5 and 11.2 of this procedure contains steps for identifying the sump line and installing the blank flange for testing purposes.

Contrary to the above, on February 22, 1991, the station was not maintained in accordance with approved procedures in that Maintenance Procedure MP/O/A/1800/105, Section 6.5, which clearly identified that a flange was to be installed on valve 3LP-19, was not followed in that personnel installed a flange on valve 3LP-20 and subsequently signed off the procedure step and then performed an independent verification that the correct installation had been performed in accordance with Steps 11.2.1, 11.2.5-11.2.10 of the procedure.

- B. Technical Specification 6.4.1 requires that the station be operated and maintained in accordance with approved procedures. It also states that written procedures with appropriate check-off lists and instructions be provided for preventive or corrective maintenance which could affect nuclear safety or radiation exposure to personnel.

Procedure PT/3/A/203/04, Low Pressure Injection System Leakage, approved on March 28, 1989, contains guidance for periodically testing the Low Pressure Injection System outside containment and for verifying that valves 3LP-19 and 3LP-20 can be manually opened. Enclosure 13.2 of the procedure provides instructions for leak test of the emergency sump line to valve 3LP-19 during a unit outage.

Contrary to the above, on February 23, 1991, steps contained in the enclosure to the procedure for valve 3LP-19 were verified as having been completed, when in fact, a blank flange had been installed on valve 3LP-20 and that line had been filled and hydrostatically tested.

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- C. 10 CFR 50, Appendix B, Criterion V, and the licensee's accepted Quality Assurance Program (Duke Power Company, Topical Report, Quality Assurance Program, Duke-1-A), Section 17.2.5, collectively require that activities affecting quality be prescribed by procedures of a type appropriate to the circumstances and that such activities be accomplished in accordance with these procedures. Oconee Nuclear Station Operations Management Procedure (OMP) 4-5, Station Labeling and Control Board Conventions, Revision 3, contains standards for the development, approval and installation of plant equipment labels.

Contrary to the above, on February 22, 1991, a non-standard label containing erroneous information was used by maintenance personnel during performance of quality-related activities. The non-standard label was not developed, approved or installed in accordance with OMP 4-5.

Violations A, B, and C have been categorized in the aggregate as a Severity Level III problem (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, Duke Power Company is hereby required to submit a written statement or explanation to the U. S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, U. S. Nuclear Regulatory Commission, Region II, 101 Marietta Street, N.W., Suite 2900, Atlanta, GA 30323, and a copy to the U. S. Nuclear Regulatory Commission Senior Resident Inspector at the Oconee Nuclear Station, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

FOR THE NUCLEAR REGULATORY COMMISSION



fr Stewart D. Ebnetter  
Regional Administrator

Dated at Atlanta, Georgia  
this 4<sup>th</sup> day of June 1991