

DUKE POWER COMPANY

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August 30, 1985

Dr. J. Nelson Grace, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30302

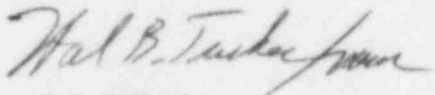
Subject: McGuire Nuclear Station
Docket No. 50-369, 50-370

Reference: RII:WTO
NRC/OIE Inspection Report 50-369/85-21, 50-370/85-22

Dear Dr. Grace:

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

Very truly yours,



Hal B Tucker

WHM:hrp

Attachment

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

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Duke Power Company
McGuire Nuclear Station
Response to Violations in Inspection Report
50-369/85-21 and 50-370/85-22

Violation 369/85-21-01, 370/85-22-01, Severity Level IV

Technical Specification 6.8.1.a requires that current written approved procedures be established, implemented, and maintained covering safety related activities that include safety injection system operation and shift turnover.

Contrary to the above:

- a. The Unit 1 personnel airlock inner interlock key switch was not returned to the active position on December 9, 1984, as required by the Personnel Airlock Operations procedure.
- b. On June 12, 1985, the Unit 1 and Unit 2 shift supervisor's Turnover Checklist page 3 was not completed or followed during shift turnover in that the shift crew composition was not identified as required.
- c. On June 6, 1985, Unit 2 procedure OP-2-A-6200-06, Safety Injection System, was found to have valve 2NI-162, the safety injection discharge cold leg isolation valve, listed as the minimum flow valve.

Response to a:

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 procedural deficiency because the appropriate procedures did not require a sign-off step to verify that the interlock key switches are in the "active" position when returning the airlock to service. Details of this event were submitted to the NRC on April 19, 1985 in Licensee Event Report (LER) 369/85-10.

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

Both airlock doors were verified to be closed and sealed and containment integrity was not compromised. Further details are in LER 369/85-10.

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

A step was added to the Controlling Procedure For Unit Start-Up to verify that all airlock interlock keyswitches are in the "active" position prior to the unit entering Mode 4.

Independent Verification sign-off were added to the Personnel Airlock Operations procedure to ensure interlock keyswitches are returned to the "active" position when both doors are closed.

5. Date when full compliance will be achieved:

McGuire Nuclear Station is presently in full compliance.

Response to b:

1. Admission or denial of the alleged violation:

Duke Power agrees that the violation occurred as stated.

2. Reasons for the violation:

A shift manning schedule is completed prior to turnover identifying the minimum crew composition. During turnover if all employees identified as as part of the crew are present then the minimum crew composition is achieved. If any are absent then the manning schedule is consulted. This shift manning schedule information was not transcribed onto the turnover checklist.

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

The shift supervisor completed the turnover checklist.

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

The shift support technician will ensure that the manning chart is completed during the turnover process.

5. Date when full compliance will be achieved:

McGuire Nuclear Station is presently in full compliance.

Response to c:

1. Admission or denial of the alleged violation:

Duke Power agrees that the violation occurred as stated.

2. Reasons for violation:

This violation occurred due to the nomenclature for valve 2NI-162 being typed the same as that of the valve preceding it in the valve checklist. A typographical error occurred the last time the procedure was reissued and was overlooked when reviewed.

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

A procedure change was approved on 6/7/85 to OP/2/A/6200/06, Safety Injection System, to correct the nomenclature. All other control room valves in this procedure as well as the Unit 1 procedure were checked and no additional typos were found.

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

Changes in procedures will be proofread more carefully.

5. Date when full compliance will be achieved:

McGuire Nuclear Station is presently in full compliance.

Violation 369/85-21-02, 370/85-22-02, Severity Level IV

10 CFR 50, Appendix B, Criterion XVI as implemented by Duke Power Company (DPC) Topical Report, Quality Assurance Program Duke-1-A, Amendment 7, Section 17.2.16 requires that conditions adverse to quality such as failure to perform required surveillance, be promptly identified and corrected.

TS 4.7.11.2 requires that each unlocked fire door without electrical supervision be verified closed at least once per 24 hours.

Contrary to the above, prompt corrective action was not taken on April 14, 1985, to assure that unlocked fire doors PD-1 and PD-2 were closed daily following identification by Quality Assurance of numerous surveillance violations. Effective daily surveillance was not implemented until April 30, 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 an administrative/procedural deficiency. From February 14, 1985 until April 25, 1985, fire doors PD-1 and PD-2, which are normally locked closed, were unlocked. These doors are normally verified closed weekly in accordance with PT/O/A/4250/12 and Technical Specifications. While unlocked, the doors were not verified closed daily nor was a fire watch posted as required by Technical Specifications. Details of this event were submitted to the NRC in Licensee Event Report (LER) 369/85-12.

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

Corrective actions consisted of implementing the required surveillance, and clarifying the responsibility for carrying out surveillance and the reporting and correcting of discrepancies. See LER 369/85-12 for further details.

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

A review of management controls for handling fire doors was conducted to determine the division of responsibility for these doors.

5. Date when full compliance will be achieved:

McGuire Nuclear Station is presently in full compliance.

Violation 369/85-21-03, Severity Level IV

Technical Specification 3.9.4, Containment Building Penetrations, requires during core alterations that each penetration providing direct access from the containment to the outside atmosphere, shall either be closed by an isolation valve, blind flange, manual valve or be exhausting through operable reactor building containment purge exhaust system HEPA filters and charcoal absorbers.

Contrary to the above, Unit 1 containment ventilation cooling water vent valves IRV-429, outside containment, and IRV-365, inside containment were open during the period May 19 through May 25, 1985, resulting in a breach of containment integrity during core reload.

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 personnel error, even though it could not be determined when or why the valve was opened. Details of this event were submitted to the NRC on July 8, 1985 in Licensee Event Report (LER) 386/85-18.

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

Upon discovery of the situation, valve IRV-429 was closed and locked and an investigation was initiated.

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

Proper performance of penetration checklists was emphasized with employees to avoid delays and possible changes in controlling valve positions.

5. Date when full compliance will be achieved:

McGuire Nuclear Station is presently in full compliance.