

DMB

DUKE POWER COMPANY

P.O. BOX 33189

CHARLOTTE, N.C. 28242

HAL B. TUCKER

VICE PRESIDENT
NUCLEAR PRODUCTION

TELEPHONE
(704) 373-4531

November 20, 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:
NRC/OIE Inspection Report 50-369/85-30, 50-370/85-32

Dear Dr. Grace:

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

Very truly yours,

Hal B. Tucker
Hal B. Tucker

JBD/jgm

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 and Deviation in Inspection Reports
50-369/85-30 and 50-370/85-32

Violation 50-369/85-30-01, Severity Level IV

Technical Specification 3.8.1.1 states with one diesel generator inoperable, all systems, subsystems, trains, components and devices that depend upon the remaining operable diesel generator as a source of emergency power must also be operable for that train to be operable and states that if two trains are inoperable for two hours, the unit must be in at least hot standby within the next six hours and cold shutdown within the following 30 hours.

Technical Specification 3.4.3 requires for a pressurizer to be operable, that at least two groups of pressurizer heaters be operable each having a capacity of at least 150 KW.

Contrary to the above, on September 11, 1985, two trains of pressurizer heaters with their required emergency power supplies were not available from 9:50 a.m. until 7:33 p.m. on September 11, 1985.

Response:

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 operator error in that the operators didn't go back and reevaluate the 1A D/G inoperable evaluation that all redundant train's components were operable, and so did not realize were in 3.8.1.1, action c as identified in LER 369/85-27.

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

Corrective step taken was to immediately make 1A D/G operable, which removed the unit from 3.8.1.1, action c and placed it in compliance.

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

a) the report will be reviewed with shifts and emphasized when in particular action statements; b) cover in Operations Licensing Requalification Program.

5. Date when full compliance will be achieved:

Step 4(a) above has been completed. Step 4(b) will be covered in Requalification Segment I, 1986 which will be completed on March 14, 1986.

Violation 50-369/85-30-04 & 370/85-32-03, Severity Level IV

Technical Specification 6.8.1 requires that current written approved procedures be established, implemented and maintained covering shift relief, turnover and maintenance of minimum shift complement.

Contrary to the above, on September 6, 1985 at 3:00 p.m., none of the Senior Reactor Operators (SRO) designated on the shift supervisor's turnover checklist as being required to be in the control room at the time were present. A non-designated SRO was present in the control room.

Response:

1. Admission or denial of the alleged violation:

Duke Power agrees that there was a violation of the literal wording of Station Directive 3.1.9. However, there was no violation of the base document T.S. 6.2.2(b) and therefore there was no violation of the intent of Station Directive 3.1.9.

2. Reasons for violation:

Station Directive 3.1.9 was improperly worded to be more restrictive than the applicable T.S.

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

Station Directive 3.1.9 has been revised and reformatted into an Operations Management Procedure to reflect the actual requirements of T.S. 6.2.2(b).

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

All corrective actions are complete.

5. Date when full compliance will be achieved:

McGuire Nuclear Station is presently in full compliance.

McGuire Nuclear Station
Response to Deviation
50-369/85-30-02, 50-370/85-32-01

Deviation:

The following deviation was identified during an inspection conducted August 21 - September 20, 1985.

McGuire FSAR Section 9.4.2.3 and Table 9.4-2.3 stipulate that in-place testing of the Auxiliary Building Ventilation Systems (VA), had been conducted in accordance with Regulatory Guide 1.52 (Revision 2, March 1978) which in turn obligates the licensee to ANSI N 510-1975.

Contrary to those commitments, a review of completed pre-operational tests performed on both McGuire units revealed that Regulatory Guide 1.52 and/or ANSI N 510-1975 were not adhered to in that the number of data sets taken with respect to charcoal adsorber efficiency were not in compliance with those in the reference documents nor was filter air flow distribution testing performed as specified.

Response:

In the pre-operational testing of charcoal adsorber efficiency, the vendor took three data sets instead of the five in the standard. This data is taken for trending purposes. Data taken during pre-operational system testing (Units 1 and 2 - November 1980) indicated a nearly constant leakage rate for both units well below 0.05%. All operational testing has taken five data sets in accordance with the standard. The first operational test for Unit 1 was in May, 1982, and for Unit 2 was in January 1984. McGuire is presently in full compliance.

The pre-operational air flow distribution test was conducted in accordance with ANSI N510-1975; when the flow distribution across the face of the HEPA filters was not within the acceptance criteria, the results were analyzed for HEPA efficiency and found not to impair operability. Flow distribution in the carbon bed was not analyzed at this time.

Due to the lack of guidance in the 1975 standard, testing was augmented based upon criteria in the 1980 standard. The test was recently conducted in accordance with ANSI N510-1980 under the NRC/RII Confirmation of Action letter dated October 23, 1985, with results provided to NRC by Mr. H.B. Tucker's letter of October 28, 1985. In a conference call on November 1, 1985, NRC indicated review of the test results were complete and the results were acceptable. The McGuire FSAR will be updated to reflect system testing in the next annual update. McGuire is presently in full compliance.