

DUKE POWER COMPANY

P.O. BOX 33189
CHARLOTTE, N.C. 28242

HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

TELEPHONE
(704) 373-4531

March 3, 1988

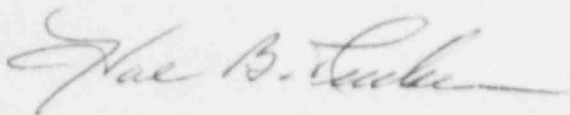
U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Subject: McGuire Nuclear Station
Docket Nos. 50-369, -370
NRC/OIE Inspection Report Nos.
50-369/87-46 and 50-370/87-46
Reply to a Notice of Violation
Violation 50-370/87-46-01

Gentlemen:

Pursuant to 10CFR 2.201, please find attached Duke Power Company's response to the violation identified in the subject inspection report.

Very truly yours,



Hal B. Tucker

SEL/244/jgc

Attachment

xc: Dr. J. Nelson Grace
Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta St., NW, Suite 2900
Atlanta, GA 30323

Mr. Darl Hood
U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, D.C. 20555

Mr. W.T. Orders
NRC Resident Inspector
McGuire Nuclear Station

8803090005 880303
PDR ADOCK 05000369
D ncn



DUKE POWER COMPANY
McGUIRE NUCLEAR STATION
REPLY TO A NOTICE OF VIOLATION
VIOLATION 50-370/87-46-01

During the NRC inspection conducted on November 7, 1987 - January 13, 1988, the following violation was identified:

10 CFR, Appendix B, Criterion XI, requires that a test program be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. The test program shall include, as appropriate, proof tests prior to installation, pre-operational tests, and operational tests during nuclear power plant operation, of structures, systems, and components. Test results shall be documented and evaluated to assure that test requirements have been satisfied.

Contrary to the above, the test program established to demonstrate that the component cooling system will perform satisfactorily in service was inadequate in that five of the six tests performed between the dates of September 4, and October 9, 1987 failed revealing that the associated train of component cooling was inoperable. In as much as a test program is, by design, established to maintain system operability, the repeated inoperability of the tested components is indicative of an inadequate program.

This is a Severity Level IV violation (Supplement I) and is applicable to Unit 2 only.

RESPONSE:

1. Admission or denial of violation:

Duke Power Company admits the violation occurred as stated.

2. Reason for the violation if admitted:

The failure of the Unit 2 Component Cooling (KC) Heat Exchanger performance test to meet acceptance criteria for these successive tests indicates the program was inadequate to verify operability as required.

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

The KC Heat Exchangers were cleaned and returned to service. The following actions were also taken:

- a. A Station Problem Report was initiated for Duke Design Engineering to begin design work for the permanent installation of a continuous KC Heat Exchanger differential pressure (DP) monitoring system; and
- b. A Duke Design Engineering design study was initiated to investigate enhancements to the Nuclear Service Water (RN) system to reduce heat exchanger fouling problems.

4. Corrective steps planned to avoid further violations:

The following corrective actions will be taken:

- a. The installation of temporary DP transmitters across the Unit 1 and 2 KC Heat Exchangers to monitor DP daily; and,
- b. Station programs are being developed to address failed surveillance tests that affect operability. The programs will contain criteria for the evaluation of the surveillance interval.

5. The date when full compliance will be achieved:

The Duke Power Company McGuire Nuclear Station will be in compliance with respect to planned corrective actions described above by the following dates:

- a. March 1, 1988; and,
- b. April 1, 1988 for the McGuire Performance section and October 1, 1988 for all other McGuire sections performing surveillances.