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DUKE POWER

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

Subject: McGuire Nuclear Station
Docket Nos. 50-369, 370
Inspection Report Nos. 369, 370/90-13
Reply to a Notice of Violation

Gentlemen:

Pursuant to 10CFR.201, please find attached Duke Power Company's response to Violation 369/90-13-02 and 369/90-13-03 for the McGuire Nuclear Station.

Should there be any questions concerning this matter, contact W. T. Byers at (704) 373-6194.

Very truly yours,

J. W. Hampton
for

Hal B. Tucker

ienov.wtb

Attachment

xc: Mr. S. D. Ebneter
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
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Mr. P. K. VanDoorn
NRC Resident Inspector
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McGUIRE NUCLEAR STATION
RESPONSE TO VIOLATIONS

Violation 369/90-13-02:

Technical Specification 3.9.11 states, in part:

The Fuel Handling Ventilation Exhaust System shall be operable whenever irradiated fuel is in the storage pool. With the Fuel Handling Ventilation Exhaust System inoperable, suspend all operations involving crane operation with loads over the storage pool until the Fuel Handling Ventilation Exhaust System is restored to operable status.

Contrary to the above, on July 10, 1990, while the Fuel Handling Ventilation Exhaust System was inoperable, a control rod was moved in the storage pool.

This is a Severity Level IV violation and applicable to Unit 1 only (Supplement I).

Response:

1. Admission or denial of violation:

   Duke Power admits the violation as stated.

2. The reason for the violation if admitted:

   The event was due to inadequate work control and group interface. On July 10, 1990, a Maintenance (MNT) fuel handler requested the Unit 1 Fuel Pool Ventilation (VF) system be placed in the filter mode. The work practice for the MNT fuel handling crew has been to go to the control room and request only that the VF system be placed in filter mode. However, having the VF system in filter mode does not ensure the system is meeting its Technical Specification (TS) requirements. The maintenance fuel handler was not aware of the terms "operable" and "inoperable" as it refers to TS. After checking the control panel, the Reactor Operator (RO) informed the MNT fuel handler the Unit 1 VF was in filter mode. The MNT fuel handler told the RO he would be moving a dummy control rod assembly from one fuel assembly to another. The RO knew the MNT fuel handler was moving a dummy control rod assembly and he also knew the Unit 1 VF system was inoperable; however, he did not realize the MNT fuel handler's job involved moving a load over the storage pool area because of his limited fuel handling experience. The RO was subsequently informed the Unit 1 VF system was required to be operable when performing this work.

3. The corrective steps taken and the results achieved:

   (1) Operations suspended any further operations in the Unit 1 spent fuel pool until the VF system was operable.

   (2) Operations management discussed this event with a representative from each operation shift with an emphasis on group interface.

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

   (1) Operations will enhance procedure enclosures dealing with fuel handling by adding a sign-off to the steps of the sections which reference the applicable fuel handling Technical Specifications.

   (2) The Maintenance Fuel Handling Supervisor will cover the event with the Maintenance fuel handling technicians with an emphasis on group interface.

5. The date when full compliance will be achieved:

   McGuire will be in full compliance 11/1/1990.

Violation 369/90-13-03:

Technical Specification 4.5.2.c requires:

Each Emergency Core Cooling System subsystem shall be demonstrated operable by a visual inspection which verifies that no loose debris (rags, trash, clothing, etc.) is present in the containment which could be transported to the Containment Sump and cause restriction of the pump suctions during LOCA conditions. The visual inspection shall be performed:

(1) For all accessible areas of the containment prior to establishing containment integrity, and

(2) Of the areas affected within containment at the completion of each containment entry when containment integrity is established.

Contrary to the above, on two occasions, loose debris was found in the Upper Containment following the completion of the containment cleanliness inspection. The first instance, during June, 1989, was not recognized as a Technical Specification violation and subsequently was not reported. The second occurrence took place during May, 1990. In neither case had successful completion of the Technical Specification Surveillance requirements been met.

This is a Severity Level IV violation applicable to Unit 1 only (Supplement I).

Response:

1. Admission or denial of violation:

   Duke Power admits the violation as stated.

2. The reason for the violation if admitted:

   On May 11, 1990, Quality Assurance (QA) personnel and Janitorial Service (K-Mac) personnel performed a cleanliness inspection of upper and lower containment in preparation to entering Mode 4. PT/1/A/4800/03F, Containment Cleanliness Inspection, was used document the inspection in upper and lower containment. QA personnel signed off the procedure steps and the containment cleanliness acceptable step in the Mode 4 checklist of OP/1/A/6100/01, Controlling Procedure for Unit Startup. On May 22, 1990, after Unit 1 had entered Mode 3, a Radiation Protection (RP) technician discovered various unsecured items in upper containment. The Reactor Building Coordinator (RBC) entered upper containment and discovered three additional items that should have been removed. The QA personnel did not document the loose material located in upper containment. QA personnel believed that RP personnel would remove their items prior to startup of the unit. QA personnel stated their focus while performing the procedure was to identify maintenance generated items left from the outage and they did not look for RP items. This mindset led to the failure to follow procedure.

3. The corrective steps taken and the results achieved:

   Corrective steps taken for the occurrence in 1989:

   (1) The identified mop heads in Unit 1 containment were removed immediately.

   (2) Station Directive 3.1.8 was reviewed to assure requirements for the recorded entry of each individual and the accountability of all materials.

   (3) Management requested a review of these controls with employees through regular supervision meetings to emphasize the importance of no loose materials in the containment buildings during operational modes.

   (4) An INFORM (Information Needed for McGuire) Bulletin was issued to all station personnel highlighting changes to Station Directive 3.1.8 and re-emphasizing housekeeping responsibilities for the Reactor Building.

Corrective steps taken for the occurrence in 1990:

(1) Operations (OPS) and RP personnel and the RBC removed the loose items from upper containment.

(2) OPS and RP personnel entered lower containment outside the crane wall and inspected for loose material.

(3) This event was discussed with the personnel involved including appropriate QA personnel.

(4) This event was discussed with the Shift Managers to ensure that consistent requirements are applied until the guidance from corrective step 1 below is determined and can be implemented.

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

(1) Integrated Scheduling (IS) and OPS personnel will obtain specific guidance as to what items may remain in containment and what methods are acceptable to secure items remaining in containment.

(2) OPS, QA, IS and RP personnel will revise PT/1/A/4800/03F and PT/2/A/4800/03F, Containment Cleanliness Inspection, to provide a clear understanding of the responsibilities of all station groups pertaining to performing the procedure.

(3) IS personnel will evaluate changing Station Directive 3.1.8, Access to the Reactor Building, based on the results of corrective step 1.

(4) OPS will evaluate changing PT/1/A/4800/03F and PT/2/A/4800/03F based on the results of corrective step 1.

5. The date when full compliance will be achieved:

McGuire will be in full compliance prior to completion of Unit 2 end of cycle 6 refueling outage.