

DUKE POWER COMPANY
POWER BUILDING
422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28242
USNRC REGION II
ATLANTA, GEORGIA

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

82 JAN 4 A 8:42

December 29, 1981

TELEPHONE: AREA 704
373-4083

Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Re: Oconee Nuclear Station
IE Inspection Report
50-269/81-23
50-270/81-23
50-287/81-23

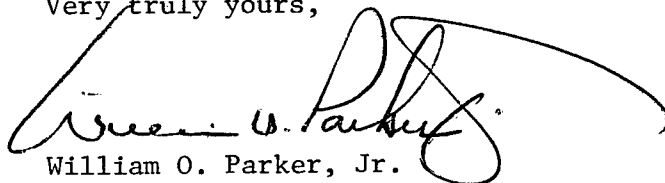
Dear Sir:

With regard to Mr. Paul J. Kellogg's letter of November 30, 1981 which transmitted the subject inspection report, Duke Power Company does not consider the information contained therein to be proprietary.

Please find attached responses to the cited items of noncompliance.

I declare under penalty of perjury that the statements set forth herein are true and correct to the best of my knowledge, executed on December 29, 1981.

Very truly yours,



William O. Parker, Jr.

JLJ/php
Attachment

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DUKE POWER COMPANY
OCONEE NUCLEAR STATION

Response to IE Inspection Report 50-269/81-23, -270/81-23, -287/81-23

Violation A

10 CFR 20.201(b) requires the licensee to make or cause to be made such surveys as may be necessary for him to comply with the regulations in 10 CFR Part 20. (Surveys means an evaluation of the radiation hazard incident to the release of radioactive materials under a specific set of conditions. When appropriate, such evaluation includes measurements of concentrations of radioactive material present). The regulations in 10 CFR 20.106 limit the concentration of radioactivity which may be released to unrestricted areas.

Oconee Nuclear Station Technical Specifications, Table 6.6-1, Part II, Report of Radioactive Effluents -- Airborne Releases, requires the total quantity of Tritium (H3) released to the unrestricted area from the station to be reported to the Commission.

Contrary to the above, samples of the Unit vent gaseous effluent flowpath to the unrestricted area were not routinely taken to determine the concentration or amount of tritium releases for the calendar year 1980 or the first nine months of calendar year 1981. Also, the report required by Technical Specification Table 6.6-1 did not include the unit vent contribution of tritium released from the station.

This is a Severity Level V Violation (Supplement IV).

Response

- 1) Admission or denial of the alleged violation:

This violation is correct as stated.

- 2) Reasons for the violation:

Past operating experience has shown that the contribution to off-site dose of tritium released through the unit vents has been negligible. Periodic grab samples for tritium are not considered to be fully representative of the total amounts of tritium released through the vents. Oconee Nuclear Station Technical Specifications Table 4.1-3 does not currently require tritium evaluation be included in unit vent sampling.

- 3) Corrective actions taken and results:

By letter dated October 30, 1980, Duke Power Company resubmitted to NRC/ONRR proposed radiological effluent technical specifications (RETS). This NRC-requested resubmittal replaced the RETS previously submitted by letter dated March 29, 1979. The RETS will implement for Oconee the requirements of 10 CFR 50, Appendix I, and include tritium sampling at the unit vents in the comprehensive effluents accountability program. The RETS for Oconee have not yet been approved by NRC/ONRR.

4) Corrective actions to be taken to avoid further violations:

The Unit Vent Sampling procedure will be revised to require weekly grab-samples of tritium for each operating unit. When the Appendix I RETS are approved by NRC/ONRR, the total Oconee effluent sampling program will be revised.

5) Date when full compliance will be achieved:

The Unit Vent Sampling procedure will be revised as stated above by February 1, 1982. The revised effluent sampling program will be implemented within thirty days of NRC/ONRR approval of the RETS.

Violation B

Technical Specification 6.4.1 states that the station shall be operated and maintained in accordance with approved procedures. Section 6.4.1.g requires Radiation Control Procedures. Health Physics Procedure HP/O/B/1004.50, Calibration Procedure: Eberline Models PS-1, PS-2 Portable Scalers Equipped with HP-210 probe, paragraph 3.0 Limits and Precautions, sub-paragraph 3.1 states that calibration of these instruments is to be performed on a quarterly basis. Also HP/O/B/1000/55, Instrument Monitoring and Survey Procedure, Section 4.0, Procedure, sub-section 4.2.1 states that the instrument calibration due date must be checked prior to use and that instruments due for calibration must be removed from service immediately.

Contrary to the above, on October 6, 1981, a smear survey was analysed utilizing Eberline portable scaler model PS-1, instrument no. 104, with a calibration sticker affixed stating that calibration was due on October 2, 1981. The instrument was used without checking the calibration due date.

This is a Severity Level VI Violation (Supplement IV).

Response

- 1) Admission or denial of the alleged violation:

This violation is correct as stated.

- 2) Reasons for the violation:

The Health Physics personnel involved in the cited instance failed to follow procedure HP/O/B/1000/55, and thus used an instrument which was overdue for calibration.

- 3) Corrective actions taken and results:

The affected instrument was removed from service until it could be calibrated. Disciplinary action was administered to the HP personnel who failed to follow the procedure. All HP technicians have been informed about this violation. Management has stressed to all HP technicians the importance of following procedures.

- 4) Corrective actions to be taken to avoid further violation:

None

- 5) Date when full compliance will be achieved.

Not applicable.

Violation C

Oconee Nuclear Station Technical Specifications, Table 4.1-3, Minimum Sampling Frequency, Item 9, Unit Vent Sampling, Check b., requires the unit vent to be sampled for particulate radioactive nuclides. The sensitivity limit for lab analysis for this sample is required to be less than 10^{-10} uCi/cc.

Contrary to the above, on October 7, 1981, a gasket was determined to have been missing from the sample apparatus for an indeterminate amount of time on the Unit 3 unit vent. Also, the filter paper intended to collect particulate matter was found to have been misaligned permitting bypass flow. Although the charcoal filter downstream of the particulate filter may have had some collection efficiency for particulates, this factor was unquantified and no assurance that the required sensitivity limit was met could be obtained.

This is a Severity Level VI Violation (Supplement IV).

Response

- 1) Admission or denial of the alleged violation.

This violation is correct as stated.

- 2) Reasons for the violation:

The procedure for Unit Vent Sampling and Analysis, HP/O/B/1000/60D, addresses the actions required for obtaining unit vent samples but did not address specific arrangement of the sampling apparatus, including gaskets and filter paper alignment.

- 3) Corrective actions taken and results:

A gasket was installed on the cited sampling apparatus and the filter was properly aligned. Procedure HP/O/B/1000/6D was revised November 10, 1981 to include a reference for proper sampling apparatus arrangement.

- 4) Corrective actions to be taken to avoid further violations:

None

- 5) Date when full compliance will be achieved:

Not applicable.