

## DUKE POWER COMPANY

POWER BUILDING

422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28242

WILLIAM O. PARKER, JR.  
VICE PRESIDENT  
STEAM PRODUCTION

June 17, 1981

TELEPHONE: AREA 704  
373-4083

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

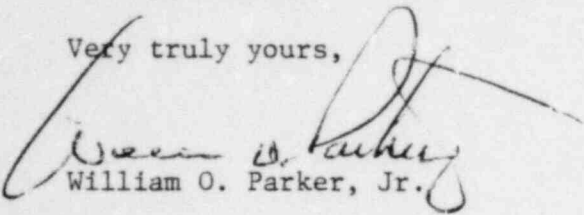
Re: RII:TJD  
50-369/81-13

Dear Mr. O'Reilly:

Please find attached a response to violation 369/81-13-03 which was identified in the above referenced inspection report. Duke Power Company does not consider any information contained in this inspection report to be proprietary.

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

Very truly yours,

  
William O. Parker, Jr.

RWO:scs  
Attachment

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PDR ADDCK 05000369  
Q PDR

McGuire Nuclear Station  
Response to IE Inspection Report 50-369/81-13

Violation:

Technical Specification 4.11.1.1.3 requires in part that continuous, flow proportional composite samples be taken of all releases to the environment from the ventilation unit condensate drain tank (VUCDT). Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained. Procedure OP/O/A/6100/09 requires removal from service of equipment which does not meet Technical Specification requirements. Procedure OP/O/A/6500/09 requires that the Chemistry and Radwaste section be contacted prior to movement of radwaste.

Contrary to the above, the requirements cited above were not met in that on April 13, 1981, the contents of the VUCDT were pumped to the environment while the composite sampler was not in service. The radwaste subsystem for pumping from the VUCDT had not been removed from service even though the sampling system was incomplete, and the Chemical Radwaste section was not notified concerning the use of the system. Subsequent sampling of the VUCDT disclosed that the contents had no radioactive contamination.

Response:

1. On April 13, 1981, the contents of the VUCDT were pumped to the environment while the composite sampler was not in service. The radwaste subsystem for pumping from the VUCDT had not been removed from service even though the sampling system was not complete. The Radwaste Chemistry section was not notified concerning the use of the system.
2. The control room personnel who made the release were unaware of the importance of monitoring a batch release from the VUCDT. Several releases had been made prior to fuel loading. They assumed that since the unit had not yet become critical, and no radiation activity was present in any of the plant's systems or atmospheres, monitoring of the tank at that time was not required. Furthermore, they believed that the VUCDT was automatically shunted to the Floor Drain Tank (FDT) and not to the RC discharge. They also failed to follow step 2.4 of procedure OP/O/A/6500/01 which stipulated, "The transfer and handling of all waste shall be coordinated with the Chemistry Radwaste Group."

The procedure, OP/O/A/6500/01, was deficient in that it did not verify that all necessary instrumentation was operable and did not require that Health Physics personnel sample and analyze tank contents prior to release.

Operations supervision failed to inform all shift personnel that the VUCDT could not be released via the RC discharge without the flow proportional sampler installed. This led to some of the confusion which precipitated this incident.

3. The discharge of the VUCDT has been routed through locked valves to the floor drain tank pending installation of the continuous flow proportional composite sampler.

OF/O/A/6500/01A (VUCDT Operation) has been written and approved. This procedure required verification of the operability of all required instrumentation prior to releasing from the VUCDT. This procedure also requires that Health Physics sample the tanks contents prior to release.

Operations personnel have been reminded that all releases made through potentially radioactive systems must be treated as if they were in fact radioactive.

4. The flow proportional sampler has been installed and is currently being tested.
5. The station is presently in full compliance.