

DUKE POWER COMPANY

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HAL B. TUCKER

VICE PRESIDENT  
NUCLEAR PRODUCTION

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April 11, 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

Reference: RII:WBG  
NRC/OIE Inspection Report 50-369/85-11

Dear Dr. Grace:

Pursuant to 10 CFR 2.201, please find attached a response to violation  
50-369/85-11-01 which was identified in the above referenced report.

Very truly yours,

*Hal B. Tucker*

Hal B. Tucker

PBN:smh

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 NRC/OIE INSPECTION REPORT 50-369/85-11

Violation 50-369/85-11-01, Severity Level IV (Supplement IV):

Technical Specification 6.8.1.a requires written procedures to be established, implemented and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, which includes procedures for control of radioactivity.

OP/O/B/6200/32 (Rev. 12, January 8, 1985) "Radwaste Procedure for the Nuclear Solid Waste System Disposal Operation" requires the Unit 1 Auxiliary Building Exhaust System to be placed in the "filtered mode" during transfer of resin.

Contrary to the above, on February 19, 1985, during a routine transfer of radioactive spent resin from the Spent Resin Storage Tank (SRST) to the Resin Batching Tank (RBT), the Unit 1 Auxiliary Building Exhaust System was not placed in the "filtered mode" as required by OP/O/B/6200/32. As a result, resin in the ventilation line of the RSBT bypassed the filter train of the Auxiliary Building Exhaust System and was released to the environment by way of the Unit 1 ventilation stack.

Response:

1. Admission or denial of the alleged violations:

Duke Power Company agrees that the violation occurred as stated in Licensee Event Report (LER) 369/85-09 which was submitted on March 29, 1985.

2. Reasons for the violations if admitted:

This event occurred due to personnel error, because of poor communication between two Radwaste Technicians which resulted in the omission of the Unit 1 vent being placed in the filtration mode during the resin transfer as required by procedure OP/O/B/6200/32 (Radwaste Procedure for the Nuclear Solid Waste Disposal System Operation), step 4.8.1.6. Also contributing were: design deficiency, due to the ability of spent resin to enter the Auxiliary Building ventilation (VA) system; and administrative/procedure deficiency, due to inadequate procedural control of a previously identified problem involving a radiation release pathway. Additional details are contained in LER 369/85-09.

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

Upon discovery the Unit 1 unit vent was placed in the filtration mode as a precautionary measure against the release of additional resin, and surveys/sampling of the affected area was initiated to ensure no offsite release had occurred. (Estimated offsite dose calculations indicated no technical specification or reportable release limits had been exceeded.) Decontamination of affected areas was initiated and will continue until complete. The waste water collection basin (WWCB) will be sampled daily

until all decontamination is completed (no WWCB sample has indicated contamination). The resin batching tank (RBT) vent connection to the VA system was cut and rerouted to vent to the RBT room (eliminating the RBT vent connection to the VA system), and a 55 gallon drum was placed under the vent. A modification to cut and cap the RBT overflow line to the mixing and settling tank (MST) and reroute the overflow to the spent resin storage tanks (SRST) inlet header will be performed. Additional actions/details are contained in LER 369/85-09.

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

All Radwaste Technicians will be instructed to properly turnover procedures by physically pointing out which step shall be performed next. OP/O/B/6200/32 will be revised to ensure that the RBT will not be operated at a level above the second sight glass without the specified permission of the Radwaste Supervisor. All operating procedures will be reviewed to ensure compliance with Station Directive 4.2.2.

Duke is evaluating the possibility of performing a thorough review of the vent and overflow arrangement for components which contain a radioactive process to help ensure a similar incident does not occur. Additional actions/details are contained in LER 369/85-09.

5. Date when full compliance will be achieved:

The station will be in full compliance upon completion of certain corrective actions (by May 1, 1985). The modification to cut and cap the RBT overflow line and the possible review of the vent and overflow arrangement will not be complete by May 1, 1985 but are not necessary to ensure full compliance.