

WMB

DUKE POWER COMPANY

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HAL B. TUCKER  
VICE PRESIDENT  
NUCLEAR PRODUCTION

October 15, 1985

TELEPHONE  
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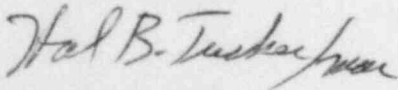
Dr. J. Nelson Grace, Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

Subject: Oconee Nuclear Station  
IE Inspection Report  
Nos. 50-269/85-26  
50-270/85-26  
50-287/85-2C

Dear Sir:

In response to your letter dated September 16, 1985 which transmitted the subject Inspection Report, the attached response to the cited item of non-compliance is provided.

Very truly yours,



Hal B. Tucker

SGG:slb

Attachment

cc: Mr. J. C. Bryant  
NRC Resident Inspector  
Oconee Nuclear Station

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## Violation

Technical Specification 6.4.1 requires the plant to be operated and maintained in accordance with approved procedures. Chemistry procedure CP/O/A/2005/06A, Determination of E-bar, requires the liquid and gaseous samples to be counted 2 to 4 hours after the initial reactor coolant sample has been collected with a recount of the same samples 5 days later to obtain the activities of any nuclides which did not show up on the initial count.

Contrary to the above requirements, calculations and documentation in the first half of 1985 did not meet procedural requirements in the following instances:

- a. Unit 1 - January 4, 1985: Performance of the 5 day sample recount was not documented.
- b. Unit 2 - May 21, 1985: Performance of the 5 day sample recount was not documented. Also, E-bar was calculated based on 45 minutes elapsed time rather than 2 to 4 hours as required.
- c. Unit 3 - June 25, 1985: The recount was performed 4 days after collection rather than the required 5 days.

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

## Response

- 1) Admission or denial of the alleged violation:

This violation is correct as stated.

- 2) Reasons for the violation:

Items a and b of the violation were the result of a procedural deficiency in that no requirement was established for keeping the sample recount documentation.

The portion of the violation that dealt with inputting the incorrect time and not adhering to the procedure in counting the sample 4 days after collection rather than the required 5 days was the result of personnel errors.

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

The incorrectly calculated Unit 2 E-bar of May 21, 1985 has been recalculated and distributed.

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

The delayed counting that is referenced in the E-bar procedure is a practice initiated by Oconee Chemistry in an effort to comply with Tech. Specs. High levels of reactor coolant activity especially iodines mask some of the less predominate isotopes namely cesium. A delay in counting a sample allows the short lived isotopes to decay, thus allowing the longer lived but less abundant isotopes to be counted. The listed five day delay is of no significance and any delay greater than two days would be adequate. Therefore, procedure CP/O/A/2005/06A is being revised to require that the sample recount be performed after two or more days delay. In addition procedure CP/O/A/2005/06A will be revised to require that all documentation associated with E-bar is retained.

Appropriate individuals in the Chemistry Section will be reinstructed on the importance of adhering to procedures.

- 5) Date when full compliance will be achieved:

Corrective action noted in (4) above will be completed by November 1, 1985.