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AUTH.NAME AUTHOR AFFILIATION
MCCOLLUM, W.R. Duke Power Co.
RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Clarifies commitment made in 970409 response to NOV re insp
 repts 50-269/96-20, 50-270/96-20 & 50-287/96-20. Intent of
 commitment has been met & rev to NSD 104 not necessary.

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Oconee Nuclear Site

P.O. Box 1439

Seneca, SC 29679

(864) 885-3107 OFFICE

(864) 885-3564 FAX

W. R. McCollum, Jr.
Vice President

October 23, 1997

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

Subject: Oconee Nuclear Site
Docket Nos. 50-269, -270, -287
Inspection Report 50-269, -270, -287/96-20
Reply to Notice of Violation 96-20-04

By letter dated March 10, 1997, the NRC issued a Notice of Violation because Oconee did not have an implementing procedure to ensure that the reactor buildings were returned to proper materiel condition prior to power operation. The violation was described in Inspection Report No. 50-269/96-20, 50-270/96-20, and 50-287/96-20. This letter is being submitted to clarify a commitment made by Oconee in response to the subject Notice of Violation.

In reply to this Notice of Violation, Duke Energy (Duke) stated in a letter dated April 9, 1997, that the roles and responsibilities for the reactor building inspection would be defined by revising Nuclear System Directive (NSD) 104. In addition, Duke indicated that the requirements for the inspection would be integrated into a formal program.

As part of the NSD 104 revision process, representatives from Oconee, McGuire, and Catawba concluded that the process to control materiel condition and housekeeping of the Oconee reactor buildings would be better managed using an Oconee procedure. NSD 104 is a generic document that is used for all areas of the plant to control materiel condition and housekeeping concerns. Specific information concerning the reactor building should not be added to NSD 104. Engineering has defined the minimum standards of acceptability for reactor building cleanliness as a condition of unit operation. The minimum standards were included in procedure MP/O/B/3005/012 that defines Oconee's process for containment inspection and close out. The procedure was issued with an effective date of September 18, 1997.

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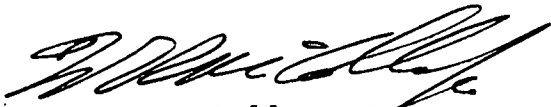
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NRC Document Control Desk
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The definition of roles and responsibilities for the reactor building inspection and the integration of the inspection into a formal process has been accomplished by the issuance of procedure MP/O/B/3005/012. Therefore, the intent of the commitment documented in response to the March 10, 1997, Notice of Violation has been met and a revision to NSD 104 is not necessary.

Very truly yours,



W. R. McCollum, Jr.
Site Vice President
Oconee Nuclear Station

cc: Mr. L. A. Reyes, Regional Administrator
U. S. Nuclear Regulatory Commission, Region II

Mr. D. E. LaBarge, Project Manager
Office of Nuclear Reactor Regulation

Mr. M. A. Scott
Senior Resident Inspector
Oconee Nuclear Site