

DUKE POWER COMPANY

POWER BUILDING

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

WILLIAM O. PARKER, JR.  
VICE PRESIDENT  
STEAM PRODUCTION

December 27, 1979

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

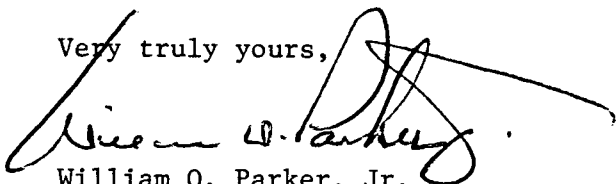
Re: RII:50-287/79-33

Dear Sir:

With regard to Mr. J. T. Sutherland's letter of December 26, 1979, which transmitted the referenced Inspection Report, Duke Power Company does not consider the information contained therein to be proprietary.

Please find attached our response to the cited items of noncompliance.

Very truly yours,

  
William O. Parker, Jr.

KRW:scs

Attachment

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DUKE POWER COMPANY  
OCONEE NUCLEAR STATION

Response to Inspection Report  
50-269/79-33

ITEM A

As required by Technical Specification 3.9.3, the rate of release of radioactive materials in liquid waste from the station shall be controlled such that the instantaneous concentrations of radioactivity in liquid waste upon release from the Restricted Area, does not exceed the values listed in 10 CFR 20, Appendix B, Table II, Column 2.

10 CFR 20.3(14) defines a Restricted Area as any area access to which is controlled for purposes of protection of individuals from exposure to radiation and radioactive materials.

Contrary to the above, on November 10 and 11, 1979, 176 gallons of water with a concentration of radioactivity totaling 3.45 times the values listed in 10 CFR 20, Appendix B, Table II, Column 2, were released to the site sewage treatment sump. There are no controls over the access of individuals in this area.

This is an infraction.

RESPONSE

As mentioned in paragraph 2 of the Inspection Report it is the position of Duke Power Company that the sewage treatment sump was not an unrestricted area for liquid effluents. This is based on the following NRC documentation.

1. NUREG-0133 (October 1978) contains the Staff interpretation of the definition of Unrestricted Area. On page 6 the following is provided:

". . . the definition of UNRESTRICTED AREA has been expanded (emphasis added) as follows: "any area at or beyond the site boundary access to which is not controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials, and any area within the site boundary used for residential quarters or industrial, commercial, institutional and recreational facilities." The UNRESTRICTED AREA boundary may coincide with the exclusion (fenced) area boundary, as defined in 10 CFR 100.3(a), may include land areas owned by the licensee, provided that occupancy is controlled by the licensee for the purposes of meeting the requirements of 10 CFR Part 20, but does not include areas over water bodies."

As stated on the preceding page this is the Staff's interpretation of 10 CFR 20.3(a)(17) separate and apart from any proposed "Appendix I" Technical Specifications.

RESPONSE (Continued)

The sanitary waste system, chemical treatment ponds, and oil collection basin are all outside of the station radiation control area but within the restricted area (see above); the sanitary waste system, chemical treatment ponds, and oil collection basin are within the site boundary which is fenced and routinely patrolled by security personnel.

2. In IE Inspection Report 77-1 with reference to the identical Technical Specification (3.9.3) Region II recognized the oil collection basin as a release point to the Unrestricted Area. The following is part of that citation.

"Radioactivity released in oil collection basin effluents on January 18-20, 1977, caused the instantaneous concentration of radioactivity released from the Restricted Area via the Keowee River to exceed the values of 10 CFR 20, Appendix B, Table II, Column 2 by up to a factor of nineteen (all emphasis added).

3. The Oconee Nuclear Station Final Safety Analysis Report Section 11.1.2.2.1 lists the Keowee Hydro tailrace as the liquid radwaste release point.

Thus, Technical Specification 3.9.3 was not violated since releases from the oil collection basin did not exceed the values listed in 10 CFR 20, Appendix B, Table II, Column 2. The effluent from the sanitary waste system enters the oil collection basin prior to discharge to the Keowee Hydro tailrace.

ITEM B

As required by Technical Specification 6.4.1.h, the radioactive waste management system shall be operated in accordance with approved procedures. Station Directive 3.8.21, "Radioactive Waste Disposal" (6/8/79), Section 4.1.1 states all radioactive liquies must be disposed of only in sinks and drains that go to the liquid waste disposal system.

Contrary to the above, on November 10 and 11, 1979, 176 gallons of radioactivity contaminated water from the A and B steam generators were drained to the sewage treatment system.

This is an infraction.

RESPONSE

See response to Item C below.

ITEM C

As required by 10 CFR 50, Appendix B III, a Quality Assurance Program must include procedures to assure changes in facility design are reviewed by a designated organization. Station Directive 4.4.2, "Processing Nuclear Station Modifications" (4/25/79), implementing this requirement, requires all modifications of station systems be reviewed and implemented in accordance

ITEM C (Continued)

with procedures referenced in Section 6 of the Station Directive. The Final Safety Analysis Report (FSAR), Figure 9-3 shows steam generator sample lines being drained to the liquid waste system. FSAR Section 11.1.2.2 states low radioactivity liquids are routed to the low activity waste tank. FSAR Section 1A.70, design criteria for control of releases of radioactivity to the environment, states liquid wastes will be monitored for activity level at all times during release.

Contrary to the above, on November 10 and 11, 1979, radioactively contaminated liquids from the steam generators were discharged to the sewage treatment system using a temporary drain line rather than the liquid waste system. This effluent path was not provided with a radiation monitor during the release. This change was made without the required evaluation.

This is an infraction.

RESPONSE

The immediate action taken to correct the cited deficiency was the removal of the temporary drain line to the sewage treatment system. The sample flow was routed correctly to drain into the liquid radwaste system.

The "Steam Generator Sampling" section of CP/O/B/100/2 (Chemistry Action Guidelines) has been revised to include a caution note stating not to flush the sample to the sanitary waste system. The person involved in the infraction has been counseled about his deficient performance in this incident. The noted corrective action should be sufficient to avoid recurrence of this type incident.