

DUKE POWER COMPANY

POWER BUILDING

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

January 8, 1979

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

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:CMH
50-269/78-27
50-270/78-26
50-287/78-27

Dear Mr. O'Reilly:

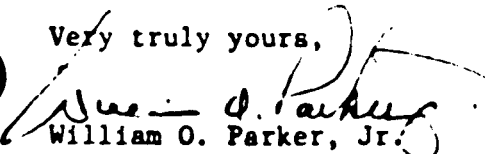
With regard to Mr. J. T. Sutherland's letter of December 12, 1978 which transmitted IE Inspection Report 50-269/78-27, 50-270/78-26, and 50-287/78-27, Duke Power Company does not consider the information to be proprietary.

Please find attached responses to the items of noncompliance. With regard to the additional item of concern relating to actions to reduce radiation exposures to individuals operating the instrument calibrator, the following is provided.

1. A one-half inch lead shield was fabricated to replace the plexiglas on the high range calibration apparatus. The lead has narrowed the source beam and lowered the exposure level at the perimeter of the apparatus to approximately 15-20 R/hr. A lead shield wall with an instrument portal was set up to further minimize personnel exposure.
2. A stronger source has been ordered to allow the source to remain lower in the calibration well and still provide the radiation levels required for high-range instrument calibration. Additionally, a beam configuration source has been ordered for low range instrument calibration which will reduce personnel exposure during calibration.

These new sources were ordered on January 4, 1979. Expected delivery date is unavailable.

Very truly yours,


William O. Parker, Jr.

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RLG:scs
Attachment

Response

1. All health physics procedures have been reviewed to determine compliance with applicable manufacturer's calibration requirements. As a result of this review, several instrument calibration procedures are in the process of being revised to reflect required calibration techniques and source levels. Also, all health physics personnel will be informed as to this matter. The above actions will be completed by January 15, 1979.
2. The valve checklist had been completed for this particular transfer of concentrates but was apparently misplaced. It should be noted however that the valve checklist is done as an initial condition and prepares the system for one or more transfers. The procedure portion of OP/O/A/1104/33 positions the valves necessary for the transfer and returns the valves to the position of the valve checklist. There is no requirement to recheck valve positions per the valve checklist prior each transfer in a series of transfers. This method serves to keep personnel exposure associated with this operation as low as reasonably achievable. It is considered that no further action in response to this item is necessary.

Item B

10CFR 20.203(c) states, in part, that high radiation areas shall be "maintained locked except during periods when access to the area is required, with positive control over each individual entry."

Contrary to the above, the door to the south end of room 121, decay heat cooler room, was found open at 1:50 p.m. on November 2, 1978. The unlocked door was not required for access.

Response

This problem has been identified previously and currently, all areas with high radiation doors are verified properly secured once per eight hour shift. As described in my letter of December 20, 1978, the high radiation area access control system is being modified. The estimated completion of this modification remains approximately 10 weeks following delivery of material.

DUKE POWER COMPANY
OCONEE NUCLEAR STATION
RESPONSE TO OIE INSPECTION REPORT
50-269/78-27, 50-270/78-26, 50-287/78-27

Item A

Technical Specification 6.4.1 states, in part, that the station shall be operated and maintained in accordance with approved procedures.

1. Section 4.2.2 of plant procedures HP/O/B/1004/22 "Calibration Procedure for Portable Neutron Survey Instruments," HP/O/B/1004/24 "Calibration Procedure for Portable GM Survey Instruments," and HP/O/B/1004/25 "Calibration Procedures for Portable Ionization Chamber Instruments" dated May 25, 1978, required that the calibration procedures in each manufacturer's instrument manual be followed. Section 4.2 of manufacturer's "Instruction Manual for Model 497 Portable Exposure Rate Survey Meter" required that an arrangement for remote viewing of the instrument be used, that the individual never place his hand in the radiation beam, and that the instrument be exposed to a known exposure rate between 100R/hr and 1000 R/hr. Section 1 of manufacturer's "Servicing Information for Teletector Model 6112" required that a dose rate of 750 r/hr be used to set a potentiometer. Section IV.C of manufacturer's instruction manual "Portable Neutron Rem Counter Model PNR-4" dated March 30, 1976, required a high voltage adjustment using a gamma source or a gamma and neutron sources.

Contrary to the above, the following procedural steps were not followed for calibrations performed during the third and fourth quarter, 1978:

- (a) remote viewing devices were not used when calibrating the model 497 survey meter
 - (b) the Health Physics Technician placed his hand in the beam for calibrating the model 497
 - (c) the model 497 survey meter was not exposed to an exposure rate between 100 R/hr and 1000 R/hr
 - (d) the teletector was not exposed to an exposure rate of 750 R/hr
 - (e) the high voltage adjustment for the PNR-4 was not made using gamma or neutron sources.
2. Step 3.1 to plant procedure OP/O/A/1104/33 "Transfer of Liquid Waste Concentrate to Mobile Unit" required that a valve checklist (enclosure 6.1) be completed for each transfer.

Contrary to the above, a valve checklist was not completed for the transfer of evaporator concentrates to the mobile unit which occurred on October 29, 1978.