DUKE POWER COMPANY
POWER BUILDING
422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28242

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

TELEPHONE: AREA 704
373-4083

January 6, 1982

Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Re: Oconee Nuclear Station
IE Inspection Report
50-269/81-30
50-270/81-30
50-287/81-30

Dear Sir:

With regard to Mr. Paul J. Kellogg's letter of December 9, 1981 which transmitted the subject inspection report, Duke Power Company does not consider the information contained therein to be proprietary.

Please find attached responses to the cited items of noncompliance.

I declare under penalty of perjury that the statements set forth herein are true and correct to the best of my knowledge, executed on January 6, 1982.

Very truly yours,

William O. Parker, Jr.

JLJ/php
Attachment

DUKE POWER COMPANY
OCONEE NUCLEAR STATION

Response to IE Inspection Report 50-269/81-30, -270/81-30, -287/81-30

Violation A

10 CFR 20.201(b) requires the licensee to perform radiation surveys as may be necessary in order to comply with the regulations in this part.

Contrary to the above, on October 15 adequate radiation surveys were not made in the Unit 2 chemical treatment pond area in that radiation levels in a small section of this unrestricted area were allowed to increase to 6 mr/hr which is in excess of Part 20 regulation 20.105(b).

This is a Severity Level V Violation (Supplement IV.E.2.).

Response

1) Admission or denial of alleged violation:

This violation is correct as stated.

2) Reasons for the violation:

Health Physics personnel responsible for radiation surveys were unaware of the existance of the cited pH sampling line discharge which drained down the bank into the #2 Chemical Treatment Pond. These personnel failed to perform adequate surveys of the #2 CTP area.

3) Corrective actions taken and results:

The cited area was surveyed, roped off and properly posted. The pH sampling line valve was isolated and tagged closed. Health Physics Surveillance and Control personnel have been instructed that more frequent and extensive radiation surveys may be required in the event of unusual radiological conditions, such as contamination of the Chemical Treatment Ponds. The pH sample line discharge has been extended and buried to allow the water to drain directly into the pond.

4) Corrective actions to be taken to avoid further violations:

More frequent surveys will be made of areas where the validity of normal surveys may be affected by dynamic conditions, such as fluctuating levels in waste holding basins and the concentrating effect of the waste-soil interaction.

5) Date when full compliance will be achieved:

The more frequent surveys noted in (4) above are presently being done as needed.

Violation B

Technical Specification 6.4.1(h) requires that radioactive waste management systems be operated and maintained in accordance with approved procedures entailing appropriate instructions to facilitate safe operation.

Contrary to the above, on November 11, 1981, operating procedure OP/O/B/1104/34, which was being employed to operate the Unit 1 laundry and hot shower tank system did not entail suction valve position requirements, which resulted in an unsampled radioactive release. Based on sample analysis and volume of water discharged the technical specification release limits were not exceeded.

This is a Severity Level V Violation (Supplement I.E.).

Response

1) Admission or denial of alleged violation:

This violation is correct as stated.

2) Reasons for the violation:

Responsibility for liquid radwaste processing and release was divided between Operations and the Radwaste group in the Chemistry section. Although administrative policies and guidelines were issued to both groups, they were apparently inadequate. The procedure used by Operations for release of the Laundry and Hot Shower Tanks did not specify that the Radwaste group was responsible for positioning the suction valves to the LHST pumps. Operations personnel were not aware of this responsibility.

3) Corrective actions taken and results:

Operations shift personnel were instructed to double verify with the Radwaste group the suction valve lineup on the LHST pumps until the Operations procedures could be revised. The appropriate Operating procedures have been revised to require notification by Operations of the Radwaste Group of any changes needed in LHST valve lineups, and assurance that the proper valve lineups have been completed prior to releases.

4) Corrective actions to be taken to avoid further violations:

A training package covering the administrative guidelines for radwaste control and interface will be developed for Operations shift personnel. Operations and the Radwaste group will review current procedures and changes to assure adequate control and interface.

5) Date when full compliance will be achieved:

Actions noted in (4) above are expected to be completed by January 15, 1982.