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 REYES, L. A. Division of Reactor Projects - I/II (Post 870411)
 RECIP. NAME RECIPIENT AFFILIATION
 YOUNGBLOOD, B. J. Project Directorate I-2

SUBJECT: Discusses 870619 memo re util request for extension of LER preparation. Util's method of notifying Region II in writing of late LER submittals appropriate & in accordance w/current guidance given in NUREG-1022, Suppl 1. No action necessary.

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AUG 05 1987

Docket Nos. 50-269, 50-270, 50-287
License Nos. DPR-38, DPR-47, DPR-55

MEMORANDUM FOR: ~~W.~~ J. Youngblood, Director
Project Directorate II-3
Division of Reactor Projects - I/II

FROM: Luis A. Reyes, Director
Division of Reactor Projects

SUBJECT: DUKE POWER COMPANY REQUESTS FOR EXTENSION OF LER PREPARATION

Your memorandum of June 19, 1987, brought to my attention several Duke LER submittals which had been postponed beyond the 30 day time limit given in 10 CFR 50.73. We feel Duke's method of notifying Region II in writing of late LER submittals is appropriate and in accordance with current guidance given in NUREG-1022 Supplement 1 (see enclosure 1). Duke postpones their LER submittals infrequently and we therefore feel no action is necessary at this time.

Duke's continuing difficulties concerning the timely submittal of Radioactive Effluent Reports were documented in Inspection Reports 269, 270, 287/85-18 and 269, 270, 287/87-09 (see enclosure 2). As a result of regional action Duke has taken steps to ensure that the reports are submitted within the required time.

Also, as you stated, Duke has delayed Final Safety Analysis Report updates without requesting an exemption. Action on your part to correct this situation would be appropriate.

ORIGINAL SIGNED BY
VIRGIL L. BROWNLEE *[Signature]*
Luis A. Reyes

- Enclosures:
1. NUREG-1022 Supplement 1
2. Inspection Report Nos. 50-269,
270, 287/87-09

- cc w/encls:
 C. Lainas, NRR
 H. Pastis, NRR

bcc w/encls: (See page 2)

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B. J. Youngblood

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AUG 05 1987

bcc w/encls:
NRC Resident Inspector
H. Pastis, NRR
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Licensee Event Report System

Description of System and Guidelines for Reporting

Manuscript Completed: February 1984
Date Published: February 1984

Office for Analysis and Evaluation of Operational Data
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



8/10/84 JMD

ABSTRACT

On July 26, 1983, the Commission published in the Federal Register a final rule (10 CFR 50.73) that modified and codified the Licensee Event Report (LER) system. The rule became effective on January 1, 1984. In September 1983, the NRC published NUREG-1022 which provides supporting information and guidance that is of interest to persons responsible for the preparation and review of LERs. The information contained in NUREG-1022 includes: (1) a brief description of how LERs are analyzed by the NRC, (2) a restatement of the guidance contained in the Statement of Consideration that accompanied the publication of the LER rule, (3) a set of examples of potentially reportable events with staff comments on the actual reportability of each event, (4) guidance on how to prepare an LER, including the LER forms, and (5) guidance on submittal of LERs. Subsequently, during the period from October 25, 1983 to November 16, 1983, the NRC staff held five regional meetings to discuss the scope and content of the LER rule with utility and NRC regional representatives. During these meetings numerous questions arose and were answered. This supplement to NUREG-1022 contains a summary of the questions asked and the answers given.

Events that were discovered (see question 14.5) in 1983 and before but were not recognized as reportable under the previous LER requirements until after 1/1/84 must still be reported. The LER requirements in effect at the time of the event should be followed and the reason for late reporting should be discussed in the cover letter. The LER number should be based on the event date. (See question 14.3)

Events that occurred prior to 1/1/84 that are reportable under 50.73 but are not reportable under the previous LER requirements need not be reported. However, if a design deficiency is discovered after 1/1/84 and it meets the criteria of 50.73 for reportability such as 50.73(a)(2)(v); it should be reported even though the actual design error was made before 1/1/84.

14.7 We have submitted LERs which have not yet been closed out (open-ended). Suppose that the events for which these LERs were written are no longer reportable under the new LER rule; must we close out these old LERs?

Answer: Yes.

14.8 Which format should be used for updating old LERs after January 1, 1984?

Answer: Revisions to past reports should be in the same format as the original report.

14.9 Suppose an event is reportable and we are looking at the cause and another event occurs two weeks later and as a result we discover a generic problem. When does the 30-day clock start?

Answer: The 30-day clock starts when the condition or events became reportable. If the first event was reportable even if the second event had not occurred, then the clock starts at the event date of the first event. However, if the first event was not reportable by itself (e.g., a single diesel failure) but the condition became reportable because of the second event (e.g., a second diesel failure which indicates that the condition that caused both failures is generic) then the clock starts at the time when the condition was found to be generic (i.e., the first event did not indicate a reportable condition; the second event did). Thus, the event starts when the condition is discovered.

14.10 What happens if the 30-day period ends on a Sunday or holiday?

Answer: Reports are due in 30 days but reports mailed on the first working day following the end of the 30 days are acceptable.

14.11 What should we do if we know that a report will be late?

Answer: Discuss the situation with the appropriate Regional Office.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

FEB 17 1987

Docket Nos. 50-269, 50-270, 50-287
License Nos. DPR-38, DPR-47, DPR-55

Duke Power Company
ATTN: Mr. H. B. Tucker, Vice President
Nuclear Production Department
422 South Church Street
Charlotte, NC 28242

Gentlemen:

SUBJECT: INSPECTION REPORT NOS. 50-269/87-09, 50-270/87-09 AND 50-287/87-09

This refers to the Nuclear Regulatory Commission (NRC) inspection conducted by R. R. Marston on February 9-13, 1987. The inspection included a review of activities authorized for your Oconee Nuclear Station. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed inspection report.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress.

Within the scope of the inspection, no violations or deviations were identified.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

Should you have any questions concerning this letter, please contact us.

Sincerely,

A handwritten signature in cursive script that reads "Thomas A. Peebles".

Thomas A. Peebles, Acting Chief
Reactor Projects Branch 2
Division of Reactor Projects

Enclosure:
Inspection Report

cc w/encl:
M. S. Tuckman, Station Manager

A handwritten scribble or signature at the bottom of the page, possibly reading "8704234455".



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION II
 101 MARIETTA STREET, N.W.
 ATLANTA, GEORGIA 30323

APR 17 1987

Report Nos.: 50-269/87-09, 50-270/87-09, and 50-287/87-09

Licensee: Duke Power Company
 422 South Church Street
 Charlotte, NC 28242

Docket Nos.: 50-269, 50-270, and 50-287

License Nos.: DPR-38, DPR-47, and
 DPR-55

Facility Name: Oconee 1, 2, and 3

Inspection Conducted: February 9-13, 1987

Inspector: R.R. Marston 3/17/87
 R. R. Marston Date Signed

for R.R. Marston 3/17/87
 S. S. Adamovitz Date Signed

Approved by: J. B. Kahle 3/17/87
 J. B. Kahle, Section Chief Date Signed
 Division of Radiation Safety and Safeguards

SUMMARY

Scope: This routine unannounced inspection involved onsite review of the liquid and gaseous radwaste programs and a review of TMI action items II.B.3, Post-Accident Sampling; II.F.1.1, Post-Accident Noble Gas Effluent Monitoring; and II.F.1.2, Post-Accident Sampling and Analysis of Plant Effluents.

Results: No violations or deviations were identified.

[Handwritten signature]

procedures involving potential or actual release of radioactivity; personnel radiation protection procedures; and Offsite Dose Calculation Manual implementation. The inspectors reviewed selected portions of procedures concerning post-accident sampling and analysis, in-place filter testing, and gaseous and liquid radwaste systems. The inspectors noted that procedures were being reviewed, updated, and approved in accordance with administrative requirements.

No violations or deviations were identified.

6. Semi-Annual Effluent Reports (84723, 84724)

- a. Technical Specification 6.6.1.4 requires that routine Radioactive Effluent Release Reports covering the operation of the unit during the previous six months of operation shall be submitted within 60 days after January 1 and July 1 of each year. The inspectors reviewed the Oconee Nuclear Station Semi-Annual Radioactive Effluent Release Reports for 1985 and the first half of 1986. The effluent release data summarized in Table A was obtained from current and previous Semi-Annual Effluent Release Reports:

TABLE A

Effluent Release Summary for Oconee
Units 1, 2 and 3

Liquids (curies)

<u>Calendar Year</u>	<u>Fission and Activation Products</u>	<u>Tritium</u>
1984	1.58 E0	1.28 E+03
1985	4.16 E0	1.24 E+03
1986 (1st Half)	8.95 E-01	7.05 E+02

Gases (curies)

<u>Calendar Year</u>	<u>Noble Gases</u>	<u>Halogens</u>	<u>Tritium</u>
1984	2.28 E+04	1.33 E-01	4.17 E+02
1985	2.35 E+04	4.95 E-03	4.28 E+01
1986 (1st Half)	1.11 E+04	8.73 E-03	2.14 E+01

- b. The inspectors noted continuing difficulties concerning the timely submittal of these reports to the NRC. This problem was documented in a previous inspection report (50-269, 270, 287/85-18). The last four semi-annual effluent reports for second half 1984 through first half 1986 were submitted 30, 3, 5 and 30 days late, respectively. A memo dated October 28, 1986, from Licensing to various Oconee management personnel discussed problem areas concerning the

Semi-Annual Effluent Release Reports and possible solutions. In a telephone conversation with the inspector on March 6, 1987, a licensee representative stated that the Semi-Annual Effluent Report for the second half of 1986 was transmitted on February 27, 1987, which was within the required time period. It was apparent that the licensee has taken corrective measures to ensure that reports are submitted within the required time.

No violations or deviations were identified.

7. Radioactive Liquid and Gaseous Effluent Monitoring (84723, 84724)

Technical Specification 3.5.5 specifies the requirements for the operability of radioactive liquid effluent, gaseous effluent, and gaseous process monitoring instrumentation. The inspectors and licensee representatives examined selected effluent monitoring locations and verified the operability of selected control room monitor readouts. Additionally, records of the following liquid and gaseous effluent radiation monitor calibrations were reviewed:

RIA-32, Auxiliary Building Gas Monitor
Unit 1, September 3, 1986
Unit 3, December 10, 1986

RIA-37, Waste Gas Disposal Monitor (Normal)
Units 1 and 2, January 6, 1986
Units 1 and 2, January 22, 1987

RIA-38, Waste Gas Disposal Monitor (High)
Units 1 and 2, February 6, 1986

RIA-40, Air Ejector Vent Monitor
Unit 2, January 5, 1986

RIA-43, Vent Particulate Monitor
Unit 1, February 10, 1986
Unit 3, February 5, 1986

RIA-44, Vent Iodine Monitor
Unit 1, December 10, 1985
Unit 2, January 8-9, 1986

RIA-45, Vent Gas Monitor (Low)
Unit 1, May 5, 1986
Unit 3, January 28, 1986

RIA-46, Vent Gas Monitor (High)
Unit 2, January 5, 1986

RIA-48, Reactor Building Gas Iodine Monitor
Unit 3, September 1, 1986