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SUBJECT: Responds to NRC 881024 ltr re violations noted in Insp Repts 50-269/88-31,50-270/88-31 & 50-287/88-31.

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DUKE POWER

November 23, 1988

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Inspection Report 50-269, -270, -287/88-31

Gentlemen:

Please find attached a response to the subject Notice of Violation dated October 24, 1988 concerning main condenser off gas sampling.

Very truly yours,

Hal B. Tucker

PJN/431/mmf

xc: M.L. Ernst
Acting Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta Street, NW, Suite 2900
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Duke Power Company
Oconee Nuclear Station
REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS. 50-269, -270, -287/88-31

Technical Specification 6.4.1 states that written procedures with appropriate check-off lists and instructions shall be provided for: (1) actions taken to correct specific and foreseen potential malfunctions of systems or components involving radiation levels; (2) preventive or corrective maintenance which could affect radiation exposure to personnel; and (3) personnel radiation protection procedures.

10CFR20.201(b) states that each licensee shall make or cause to be made such surveys as are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present.

Contrary to the above, as of the time of the inspection, there were no written instructions for the operation of valves which allowed sampling of the off gas from the main condensers of Units 1, 2, and 3. The improper set up of the Unit 1 sampling system, attributed to the lack of procedures, resulted in at least two release of radioactive gases into a sampling work station occupied by plant personnel, and their subsequent unmonitored release from the Unit 1 Turbine Building to the outside environment. Such radiation protection surveys as were made failed to identify the associated potential radiation hazards.

RESPONSE:

1. Admission or denial of the alleged violation:

   Duke denies a violation of NRC requirements occurred due to the insignificant safety hazard.

   The inspector indicated that the sampling train was exhausted to the work area which he later defined as a 10 x 10 x 10 foot area, when in fact it was exhausted to a 16 x 20 foot open shaft which runs from the basement to the top floor of the turbine building. Additionally, the open floor space next to the shaft where the sample train was located is approximately 30 x 20 x 20 feet.

   The turbine building has a forced ventilation system. Air movement measurements were taken in the work area and are conservatively estimated to be 60 ft/min away from the work area. A 10 x 10 x 10 foot area would be purged once every 10 seconds.

   A charcoal filter and filter paper were in line at all times when samples were taken as defined in procedure HP/O/B/1000/57. No nuclides other than noble gasses were released at any time. It should also be noted that the sample duration was only long enough to purge the 4400 cc gas marinelli (approximately 5 minutes).

   Based on these facts, 78% of the Maximum Permissible Concentration of radionuclides in the work area atmosphere is an overly conservative estimate of the actual concentration that workers were exposed to. A more realistic estimate of the concentration is 3% of the Maximum Permissible Concentration.

2. Reason for violation.

The violation is denied.

3. The corrective steps which have been taken and the results achieved:

Although this type of sampling does not exceed the qualification of the Health Physics Technicians who performed the sampling, procedure HP/O/B/1000/57 was modified while the inspector was still on site to include the specific task of sampling main condenser off gas. The sample off gas is now vented back into the sample header, and the task is performed in a consistent manner.

4. Corrective steps which will be taken to avoid further violations:

No further steps will be taken.

5. Date of full compliance:

Full compliance has been achieved.