

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9202250355 DOC.DATE: 92/02/18 NOTARIZED: NO DOCKET #  
 FACIL:50-269 Oconee Nuclear Station, Unit 1, Duke Power Co. 05000269  
 50-270 Oconee Nuclear Station, Unit 2, Duke Power Co. 05000270  
 50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287

AUTH.NAME AUTHOR AFFILIATION  
 HAMPTON,J.W. Duke Power Co.  
 RECIP.NAME RECIPIENT AFFILIATION  
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 911213 ltr re violations noted in insp rept  
 50-269/91-31,50-270/91-31 & 50-287/91-31.Corrctive actions:  
 Radiation Protection Section Manual will be updated.

DISTRIBUTION CODE: IE01D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 3  
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

## NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD2-3 PD	1 1	WIENS,L	1 1
INTERNAL:	ACRS	2 2	AEOD	1 1
	AEOD/DEIIB	1 1	AEOD/DSP/TPAB	1 1
	DEDRO	1 1	NRR HARBUCK,C.	1 1
	NRR MORISSEAU,D	1 1	NRR/DLPQ/LHFBPT	1 1
	NRR/DLPQ/LPEB10	1 1	NRR/DOEA/OEAB	1 1
	NRR/DREP/PEPB9H	1 1	NRR/DST/DIR 8E2	1 1
	NRR/PMAS/ILRB12	1 1	NUDOCS-ABSTRACT	1 1
	OE DIR	1 1	OGC/HDS2	1 1
	REG <del>FILE</del> 02	1 1	RGN2 FILE 01	1 1
EXTERNAL:	EG&G/BRYCE,J.H.	1 1	NRC PDR	1 1
	NSIC	1 1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,  
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION  
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 24 ENCL 24

Duke Power Company  
Oconee Nuclear Generation Department  
P.O. Box 1439  
Seneca, SC 29679

J.W. HAMPTON  
Vice President  
(803)885-3499 Office  
(704)373-5222 FAX



**DUKE POWER**

February 18, 1992

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

Subject: Oconee Nuclear Station  
Docket Nos. 50-269, -270, -287  
Inspection Report 50-269, -270, -287/91-31  
Reply to Notice of Violation

Dear Sir:

By letter dated December 13, 1991, the NRC issued Inspection Report No. 50-269/91-31, 50-270/91-31, and 50-287/91-31 with a Notice of Violation. Pursuant to the provision of 10 CFR 2.201, a written response to the violations identified in the above Inspection Report was submitted on January 10, 1992. Based on a January 16, 1992 discussion between the Senior Resident and the Regulatory Compliance Manager, and NRC correspondence dated January 23, 1992, I am submitting a revised response to violation 269,270,287/91-31-02 clarifying the corrective steps to avoid further violations.

Very truly yours,

*Joe M. Davis*  
for J. W. Hampton

cc: Mr. S. D. Ebnetter, Regional Administrator  
U. S. Nuclear Regulatory Commission, Region II  
101 Marietta Street, NW Suite 2900  
Atlanta, GA 30323

Mr. L. A. Wiens, Project Manager  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
One White Flint North, Mail Stop 9H3  
Washington, DC 20555

P. E. Harmon, Senior Resident Inspector  
Oconee Nuclear Station

9202250355 920218  
PDR ADOCK 05000269  
Q PDR

*JED*

Violation 269,270,287/91-31-02

Technical Specification 6.4.1 requires that the station be operated and maintained in accordance with approved procedures.

Station Directive 3.3.2, Section 3.4.4, requires all radioactive materials removed/transported from the Restricted Area, to be surveyed by the Radiation Protection (RP) group and labeled as radioactive material.

Station Directive 3.3.2, Section 3.4.6, requires scrap material to be surveyed for contamination prior to removal from the restricted area.

Contrary to the above, radioactive/contaminated material was removed from the Restricted Area without adequate surveying and labeling.

RESPONSE:

1. The reason for the violation, or, if contested, the basis for disputing the violation:

This violation occurred because adequate controls were not in place to prevent the removal of unsurveyed radioactive asphalt from the Protected Area.

2. The corrective steps that have been taken and the results achieved:

The asphalt which was removed from the Protected Area was surveyed and that asphalt found to be contaminated was returned to the Protected Area for proper disposal.

The remaining contaminated asphalt at the job site, within the Protected Area, was containerized for proper disposal.

3. The corrective steps that will be taken to avoid further violations:

- a) Contaminated asphalt located in high traffic areas within the Protected Area of the plant will be removed and disposed of. All other locations will be roped and posted, providing warning to workers to notify RP before removing materials from these areas.

- b) The Protected Area Vehicle Log will be revised to require all vehicle drivers to acknowledge, for entry into the Protected Area, a requirement to notify RP prior to loading and removing contaminated or potentially contaminated materials from the Protected Area.

3. The corrective steps that will be taken to avoid further violations: (continued)
  - c) Station Directive 3.3.2, Radioactive Material Control, will be revised to better define the Station's responsibility to notify and plan with Radiation Protection those work activities that will involve the removal of contaminated or potentially contaminated material from the Protected Area.
  - d) The Radiation Protection Section Manual will be updated to include maps showing those ground locations within the Protected Area that are potential sources of radioactive material.
  - e) This incident will be covered in the Oconee Nuclear Site Staff Notes.
  - f) This incident will be presented in the Annual General Employee Training for a duration of one (1) year.
4. The date when full compliance will be achieved:

Items a and b will be completed by September 1, 1992.

Items c, d and e will be completed by March 1, 1992.

Item f will be included in the Annual General Employee Training by March 1, 1992. This supplemental training material will be used for a duration of (1) year.