

ENCLOSURE 1

NOTICE OF DEVIATION

Duke Power Company  
Oconee 1, 2, and 3

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

During an NRC inspection conducted on July 31 - August 27, 1994, deviations from written commitments were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action," 10 CFR Part 2, Appendix C, the deviations are listed below:

- A. Final Safety Analysis Report, Section 6.2.4.2, "Continuous Leakage Monitoring", states in part that all penetrations except the following are grouped within or vented to the penetration room. Any leakage that might occur from these penetrations will be collected and discharged through high efficiency particulate air (HEPA) filters and charcoal filters to the unit vent. In this manner, leakage which might occur from these penetrations will be isolated from leakage which might occur through the reactor building (RB) itself.

Safety Analysis Report, page 14-63, states in part that it is assumed that 50 percent of the RB leakage will go into the penetration rooms which will be maintained at a negative pressure as described in 6.5. The atmosphere in these rooms is discharged through charcoal filters to the unit vent. The charcoal filters are assumed to be 90 percent efficient for iodine removal. The remaining 50 percent of the RB leakage is assumed to escape directly to the atmosphere. By this method a maximum of 55 percent of the iodine released from the RB is ultimately released to the atmosphere.

Contrary to the above, testing conducted during 1992 revealed that the Penetration Room Ventilation System could not maintain a negative pressure relative to the surrounding auxiliary building, with certain auxiliary building ventilation system (ABVS) fans and/or air handling units out of service. Therefore, there was no assurance that all leakage into the penetration rooms would be filtered prior to release to the atmosphere, without reliance on the nonsafety-related ABVS.

- B. Final Safety Analysis Report, Section 3.2.2.1, "System Classifications", states in part that those portions of the Engineered Safeguards Systems which may see recirculated reactor building sump water following a Loss of Coolant Accident are required to be Class II (Duke Class "B").

Contrary to the above, the portions of the high pressure injection system downstream of the high pressure injection mini-flow recirculation manual isolation valves are classified as Class III (Duke Class "C"), even though this piping may see recirculated reactor building sump water following a Loss of Coolant Accident.

Please provide to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, in writing within 30 days of the date of this Notice, the reason for the deviation, the

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corrective steps that have been taken and the results achieved, the corrective steps which will be taken to avoid further deviations, and the date when your corrective action will be completed. Where good cause is shown, consideration will be given to extending the response time.

Dated at Atlanta, Georgia  
this 21st day of September 1994