

DUKE POWER COMPANY

POWER BUILDING

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A. C. THIES
SENIOR VICE PRESIDENT
PRODUCTION AND TRANSMISSION

P. O. Box 2178

December 20, 1974

Mr. Norman C. Moseley, Director
Directorate of Regulatory Operations
U. S. Atomic Energy Commission
Region II - Suite 818
230 Peachtree Street, Northwest
Atlanta, Georgia 30303

Re: RO:II:TNE
50-269/74-11

Dear Mr. Moseley:

In response to your letter of November 26, 1974, which transmitted RO Inspection Report 50-269/74-11, the following is our response to Section I.A.

I.A.1.e. Wastewater Collection Basin Effluent pH Limit

A request for a change to Appendix B of the Oconee Nuclear Station Technical Specifications was submitted to AEC/DOL on December 13, 1973, which designated the point of measurement of the pH of the Waste Water Collection Basin effluent to be at the discharge to the Keowee River. My letter of March 11, 1974 provided additional information concerning our plans to add another collection basin to increase the storage capacity and improvements to be made to improve recirculation and mixing of waste water prior to discharge. Non-radiological Environmental Technical Specification 1.2B was revised by the Commission on October 6, 1974 to specify that the pH of water discharged from the plant site be measured at the point of discharge rather than at the collection basin. Since issuance of this revision, the limits of Technical Specification 1.2B have not been exceeded. It should also be noted that the pH was measured at the site discharge for the incidents noted in this inspection report, and in all cases, this effluent was within the limits of the present technical specification.

I.A.2.a Fish Impingement on Station Cooling Water Intake Screens

Oconee Nuclear Station Nonradiological Environmental Technical Specification 1.4A states, in part, that any significant mortalities of fish, and in all cases, any mortalities that involve 100 or more fish, shall

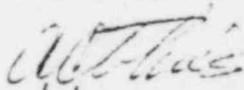
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be reported. During the interval January 29 through June 27, 1974, it was our understanding that the numbers of fish found impinged did not represent significant mortalities and were not reportable. This understanding was based on an August 30, 1973 conversation with Mr. Richard J. Clark, AEC/DOL. In that conversation, it was reported that a total of 277 fish had been counted on the intake screens during an underwater inspection. It was our position that Specification 1.4A referred to instantaneous mortalities or ones that occurred over a relatively short period of time. Accumulations of fish over a long period of time would not represent a reportable incident. Mr. Clark concurred in our understanding of the specification. Consequently, the results of the six inspections during the period January 29 through June 27, 1974 were not considered to be reportable.

We now understand from conversations with both members of your staff and the Directorate of Licensing that such mortalities should be reported. Consequently, mortalities involving more than 100 fish have been reported regardless of the significance of these mortalities. To date, fish impingement at Oconee has had no significant impact on the fisheries resources of Lake Keowee.

Very truly yours,



A. C. Thies

ACT:vr