

DUKE POWER COMPANY

POWER BUILDING

422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28201

A. C. THIES

SENIOR VICE PRESIDENT
PRODUCTION AND TRANSMISSION

P. O. Box 2178

February 19, 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

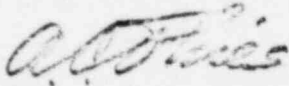
Re: RO:11:FJ
50-269/73-13

Dear Mr. Moseley:

Please find attached our response to Items I.A.1 and I.A.2 contained in RO Inspection Report 50-269/73-13. This supersedes our letter of January 25, 1974.

Duke Power Company does not consider any information contained in this inspection report to be proprietary.

Very truly yours,



A. C. Thies

ACT:vr

Attachment

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DUKE POWER COMPANY
OCONEE NUCLEAR STATION - UNIT 1
RESPONSE TO RO INSPECTION REPORT 50-269/73-13

I.A.1.a Chemical Discharge Limits

The maximum possible concentration of boric acid resulting in the Keowee River as specified in Section 1.2 of the Oconee Non-Radiological Environment Technical Specifications is 8.8×10^{-4} ppm, a factor of 10 less than the naturally occurring concentration of boron in the river. This specification, as written, cannot be successfully implemented. A request for a change of this technical specification limit was forwarded to the Directorate of Licensing on December 13, 1973. We have been informed by the Directorate of Licensing that the proposed change has been reviewed and approved and should be issued very soon.

I.A.1.b Waste Water Collection Basin Effluent pH

Technical Specification 1.2B of Appendix B now states that all water discharged from the waste water collection basin shall have a pH between 6.0 and 8.5. The pH of the effluent from the basin is not always representative of the actual discharge to the Keowee River because of the influence of other local drainage waste streams. Although the specification has not been met on many occasions when measuring pH at the basin discharge, the pH of effluent entering the Keowee River has been between 6.0 and 8.5 except for two instances. Since we believe the specification should apply to the actual effluent entering the river, we have proposed to the Directorate of Licensing that the specification be revised such that the actual discharge to the Keowee River shall have a pH between 6.0 and 8.5. If the revision is approved, the pH would be determined daily, when discharges are made from the waste water collection basin, from a representative sample collected from the combined effluent stream before it discharges to the river.

In addition to this request for a change to the technical specification, a work order has been issued for an additional waste water handling and collection facility to double present capacity. The two basins will provide separated capability for collection and discharge, plus increased capability for recirculation to allow an eight-hour turnover of volume. This will permit better control of chemistry prior to discharge.

I.A.1.c pH and Specific Conductance Monitoring

The waste water collection basin effluent pH and specific conductance was not recorded for a total of 25 days during the period July 10 through November 14, 1973. On these days, we believe the waste water collection basin was either drained or there was no discharge. It is now required that an appropriate entry be made on the daily chemistry report to reflect the status of the collection basin.

I.A.1.d Dissolved Oxygen Measurements

Although the operating license for Oconee 1 was issued on February 6, 1973, the environmental monitoring program required by that license was not completely implemented until June, 1973. The environmental technical specifications were not finalized until approximately two months before license issue; consequently,

sufficient manpower could be employed, trained and allocated until June, 1973. The Directorate of Licensing environmental projects staff was advised of this delay in implementation and did not express concern. Consequently, weekly dissolved oxygen measurements were made at the three specified locations after the monitoring program was initiated on June 8, 1973, except during the weeks of July 1, July 8, July 29, August 19, and September 9, 1973 when they were inadvertently not made. Results of the weekly monitoring program for the month of June 1973 have been reported in Table 1.3.1-10A of the Oconee Nuclear Station Semi-Annual Report for the period ending June 30, 1973.

Arrangements have been made for operation of Keowee Hydroelectric Station as required to facilitate the proper sampling of the Keowee tailrace.

To assist in the administration and execution of non-radiological environmental monitoring and surveillance procedures, another person, a trained environmentalist, will be added to the Oconee Nuclear Station staff. This individual will join the station staff on or before April 15, 1974.

1.A.1.e Fish Impingement Inspection

Although the operating license for Oconee 1 was issued on February 6, 1973, the environmental monitoring program required by that license was not completely implemented until June, 1973. The environmental technical specifications were not finalized until approximately two months before license time; consequently, sufficient manpower could not be employed, trained and allocated until June, 1973. The Directorate of Licensing environmental projector staff was advised of this delay in implementation and did not express concern. Consequently, the fish impingement inspection program was implemented on June 8, 1973. After implementation of the program, one weekly inspection was overlooked. This occurred during the first week of July, 1973. To insure that the weekly inspection of the intake screens and all other requirements of the non-radiological environmental technical specifications are met, our procedures are being set up to automatically remind personnel of dates of inspections. The addition of an environmentalist will help.

1.A.2 Reporting Requirements

Section 1.0 of the Oconee Non-Radiological Environmental Technical Specifications states, in part, that the data obtained from the programs defined in the non-radiological environmental specifications shall be analyzed and compared with analytical predictions and preoperational data. A report of the results of these programs shall be forwarded to the Directorate of Licensing at the end of each six-month period or fraction thereof, terminating on June 30 and December 31. A report summarizing the results of the overall environmental surveillance and study programs shall be submitted 60 days following the third anniversary of the date that the last unit of the Oconee Nuclear Station is licensed to operate. We believe that these reports are the only reporting mechanisms provided for in the non-radiological environmental technical specifications. As was done in the semi-annual operating report for the period ending June 30, 1973, we would report any incident in which we were not in full compliance in the Semi-Annual Report covering the period in which the incident occurred. We have also informally advised the Oconee RO inspector of any unusual condition involving the non-radiological environmental technical specifications.

Ltr to Duke Power Company fm N. C. Moseley
dtd MAR 7 1974

Ltr to N. C. Moseley fm A. C. Thies, Duke Power Company
dtd January 15, 1974, January 25, 1974, and February 19, 1974

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