

DUKE POWER COMPANY

POWER BUILDING

422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28242

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

August 15, 1977

TELEPHONE: AREA 704
373-4083

Mr. James O'Reilly, Director
U. S. Nuclear Regulatory Commission
Suite 818
230 Peachtree Street, Northwest
Atlanta, Georgia 30303

RE: RII:ALC
50-269/77-11
50-270/77-11
50-287/77-11

Dear Mr. O'Reilly:

With regard to your letter of July 22, 1977, Duke Power Company does not consider information contained in IE Inspection Report 50-269, -270, -287/77-11 to be proprietary.

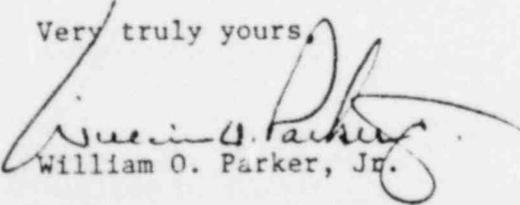
Please find attached our response to the notice of apparent violation identified in Appendix A.

A review of the conditions which resulted in the misunderstanding with regard to commitments made as a result of the pH violations has revealed several corrective actions which should be taken in order to prevent recurrence. It is requested that the NRC inspector fully identify his understanding of any commitments made during the inspection at the exit interview. These commitments will be recorded in the exit interview minutes and will be placed on the Duke Power Company commitment control program. This will assure the correct understanding of all commitments.

Additionally, the administrative controls for modifications will be revised to incorporate better identification of those modifications which result from commitments. Inherent in these administrative controls is a requirement that a revision to a modification be reviewed by the originator in order to assure that the intent of NRC commitments has not been altered.

As discussed in the July 15, 1977 meeting, a study is in progress to determine which of the control room status alarms should incorporate reflash capability.

Very truly yours,


William O. Parker, Jr.

MST:ge
Attachment

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Infraction

Appendix B Technical Specification 1.2 requires that the pH of water released from the Waste Water Treatment System shall not exceed the range limits of 6.0-9.0 defined in Table 1.2-1.

Contrary to the above, the maximum pH limit of 9.0 was exceeded as indicated below:

- a. On April 18, 1977, the Waste Water Treatment System discharge pH was as high as 9.7. pH of the discharge exceeded the 9.0 limit for approximately 2.5 hours.
- b. On May 1, 1977, the Waste Water Treatment System discharge exceeded the 9.0 pH limit for approximately 1.74 hours. The maximum pH recorded during this period was 9.2.

RESPONSE

The circumstances which led to the incidents on April 18 and May 1, 1977 which were identified in this inspection report were previously reported in our letter of April 25, 1977 and May 9, 1977 respectively to Mr. N. C. Moseley, NRC/OIE. As stated in these letters, the waste water collection basins were unavailable for normal service during the period when the two incidents occurred. The waste water collection basins were isolated to provide holdup capability and to permit removal of radioactivity which had been released to the basins in January, 1977. It was considered desirable to minimize the release of radioactivity to the environment even though the potential for exceeding the pH limits of the environmental technical specifications existed. With the waste water collection basins isolated, they could not be used to receive all water which may be present in the waste water treatment room. Water was only pumped to the waste water collection basin during regeneration of a demineralizer or during acid or caustic additions to the waste water collection basins. Therefore, it was not possible to operate the waste water collection basins as had been discussed in correspondence in early 1976.

Since the two incidents identified above, the upper waste water collection basin has been processed and is now functional and in use for pH control. The lower waste water collection basin is being processed presently and should be available for service in approximately 1 month. This will significantly reduce the likelihood of exceeding pH limitations in the future.

In order to prevent recurrence of similar incidents, the flow path identified in both of these incidents has been plugged to prevent chemicals in the water treatment room from entering the oil collection basin directly. This plug will remain in place until a more permanent correction action can be taken. Also, the chemical unloading area storm drain will be plugged each time a truck delivery of chemicals is made to the water treatment room.

The system of pH detectors and annunciators will be modified by August 31, 1977 to provide annunciators with high/low level alarms in the control room. Administrative controls have already been established to provide written guidance in the areas of pH probe calibration, cleaning, alarm setpoints and corrective action which should be taken upon receipt of alarms.

In order to assure that all potentials for exceeding the pH release limit have been considered, two independent comprehensive reviews of the chemicals present at Oconee Nuclear Station and the procedures for controlling water treatment room have been conducted. Recommendations from these reviews are being evaluated and will be implemented as appropriate.

It is considered that the implementation of these corrective actions and those discussed in the cover letter of this report will assure compliance with effluent release pH limits.