

DUKE POWER COMPANY

POWER BUILDING

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

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

TELEPHONE: AREA 706
373-4083

June 30, 1977

Mr. Norman C. Moseley, Director
U. S. Nuclear Regulatory Commission
Suite 818
230 Peachtree Street, Northwest
Atlanta, Georgia 30303

Re: IE:II:TNE
50-269/77-7
50-270/77-7
50-287/77-7

Dear Mr. Moseley:

With regard to your letter of June 8, 1977, Duke Power Company does not consider information contained in IE Inspection Report 50-269, -270, -287/77-7 to be proprietary.

Please find attached our response to Items A and B listed in Appendix A of your letter. Additional actions to improve communications among differential organizational groups at Oconee Nuclear Station are also included in this response.

Very truly yours,

William O. Parker Jr. / JLB
William O. Parker, Jr.

LJB:vr
Attachment

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Item A

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

Contrary to the above, flushing of the secondary side of the steam generator 1B was stopped and the steam generator was filled on May 10, 1977, and leak tested on May 11, 1977, although the secondary side contamination levels were not low enough to allow draining to the hotwell as required by procedure OP/O/A/1106/30, and as determined by Enclosure 4 to procedure CP/O/B/100/2.

RESPONSE

Procedure CP/O/B/100/2, "Corrective Action Guidelines" Enclosure 4, included in it a criteria for draining contaminated steam generator water to the hotwell. This criteria was being used by the station chemist as basis for approval of steam generator water for use during a leakage test of the steam generator after a primary-to-secondary leak. Although the station chemist's designate did not intend that this water be used for leakage testing, a communication problem between the shift personnel and the chemistry technician caused it to be used for leakage testing.

When this problem was noted, several actions were taken to prevent recurrence.

1. A procedure change was approved on May 16, 1977 requiring that approval from the Operations Duty Engineer and the Duty Chemist be secured prior to leak testing. This change also specified the criteria to be used for leak testing of the steam generator.
2. In addition, a joint review by Operations, Health Physics, and Chemistry representatives was conducted on June 9, 1977 of all procedures associated with steam generator leaks. Included in this review were OP/O/A/1106/30, "Identification of Failed Steam Generator Tubes," OP/O/A/1106/31, "Control of Secondary Contamination," HP/O/B/1000/62Q, "Environmental Surveillance Following a Primary-to-Secondary Leak," and CP/O/B/100/2, "Corrective Action Guidelines." A potential steam generator leak was followed through the entire process required of each procedure and any necessary changes to improve communication and coordination of section activities were initiated.

As a result of this review, several significant improvements were made:

1. OP/O/A/1106/30 requires that the Chemistry Duty Supervisor and Operations Duty Engineer sign the procedure as an indication of their agreement to leak test the steam generator.
2. CP/O/A/100/2 was revised to clarify the required flushing of the steam generator and the maximum activity levels allowed for testing the steam generator.

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OP/O/A/1106/31 was revised to require that batch releasing of the turbine building sump be initiated after indications of a steam generator leak and that it be continued until the Superintendent of Operations and the Superintendent of Technical Services agree that it may be discontinued.

The Superintendent of Operations and Superintendent of Technical Services are committed to improve communications between the groups. Where deficiencies are identified, action will be taken to resolve them through whatever means is necessary.

Item B

Paragraph 19.11 of 10 CFR 19 requires in part that the licensee post, within 2 working days of receipt or dispatch, copies of any notice of violation involving radiological working conditions, any notice or proposed imposition of civil penalty, and the licensee's response to such notices.

Contrary to the above, as of May 12, 1977, the licensee had not posted copies of: the notice of violation involving radiological working conditions contained in IE Inspection Report No. 50-269/77-3, which was received at the site on April 15, 1977; the notice of proposed imposition of civil penalties dated March 29, 1977; and the licensee's responses to these notices which were dispatched on May 2, 1977 and April 20, 1977, respectively.

RESPONSE

The documents referenced in the Notices of Violation were not posted as required by 10 CFR 19 because of failure to recognize the need for posting. The receipt of the proposed imposition of civil penalty was the first such occurrence at Oconee and the need for posting was overlooked.

Although the civil penalty letter was not posted as required, the contents of the letter were made available to station personnel through station supervision, the station newsletter, and through the local news media.

To prevent these actions from recurring, administrative controls will be established which will require a more formal review of documents which may require posting. Also, a clearer definition will be provided to allow more consistent control over which documents are to be posted and the length of time the items must be posted. This action should be completed by July 15, 1977.