Central files

NOV 17 1977

MEMORANDUM FOR: K. Goller, Assistant Director for Operating Reactors. DOR

FROM:

B. Grimes, Chief, Environmental Evaluation Branch, DOR

SUBJECT:

OCONEE - TECHNICAL SPECIFICATION AMENDMENT TO CONTROL

SECONDARY-SIDE RADIOACTIVITY

PLANT NAME: Oconee Nuclear Station, Units Nos. 1, 2 and 3

DOCKET NOS .: 50-269, -270, -287

RESPONSIBLE BRANCH: ORB #1
PROJECT MANAGER: D. Neighbors
REVIEW STATUS: EEB - Complete

In response to EEB recommendations (July 7, 1977 letter from B. Grimes to K. Goller), an NRC letter dated August 4, 1977 was sent to Duke Power Company requesting the licensee to propose revisions to the Oconee Technical Specifications. We have completed our review of this matter and have prepared a safety evaluation which is enclosed.

Our recommended revisions consisted of:

- inclusion of an operational requirement on the installed turbine building sump monitor with an alarm in the control room.
- addition of a composite water sampler at the outfall of the oil collection basin with weekly gamma spectra analysis and quarterly Sr-89 and Sr-90 analysis, and
- 3) addition of a requirement for two independent checks on valve alignment for discharge of radioactive spent resin from the secondary water clean-up system to the receiving tanks to prevent an inadvertent release of highly contaminated resins to the waste water collection basin following steam generator leaks.

We concluded that these additional monitoring and administrative controls were required at the Oconee facility to keep radioactive releases "as low as reasonably achievable" in accordance with Appendix I to 10 CFR Part 50. Additionally, these revisions were determined to be necessary in maintaining adequate control of secondary-side radioactivity, which was the subject of DOR Information Memorandum No. 5. Duke Power Company replied by letter

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dated September 27, 1977, and amended by letter dated October 14, 1977. stating their intention to conduct the above action on a voluntary basis but did not consider a revision to the Technical Specifications necessary. Duke also took exception to the recommendation of routine analysis of the oil collection basin outfall for Sr-89 and Sr-90. They considered this analysis necessary only in the event of an inadvertent release. We have evaluated Duke's letters of commitment and discussed the issue with Region II (A. Kowelczuk, Oconee radwaste inspector, and A. Gibson, Section Chief. FFMS Branch). We have determined that the monthly strontium analysis is needed and that Technical Specifications on these items are necessary to assure that I&E has the tools to enforce the objectives of the recommended revisions.

In addition, we have evaluated the Duke Power Company letters of December 2, 1976 and August 4, 177 which address the Oconee procedure for controlling very low level radianted resins from the secondary water clean-up system.
The Duke procedure ts of discharge of these resins to the waste water - dure specifies a maximum inventory of radiocollection basins. activity for the bas it the consequences of any potential release of radioactivity from this pathway to a fraction of the Appendix I design objective doses. While the Oconee method of control of very low level radioactive spent resins is acceptable, a revision to the Technical Specifications incorporating the Oconee procedures and maximum radioactivity limits for the discharge of the resins is necessary. Also, a surveillance requirement for an annual sample and radioactive analysis of the waste water basin bottoms is needed to verify the total quantity of radioactivity in the basins. These revisions to the Oconee Technical Specifications will assure adequate processing of radioactive spent resins and adequate control of radioactivity in the waste water collection basins.

As requested by the ORPM, D. Neighbors, a Safety Evaluation is enclosed to support a license amendment incorporating the recommended revisions in the Oconee Technical Specifications.

The appropriate wording and location of the revisions will be worked out between Duke Power and the NRC (D. Neighbors, ORB #1 and J. S. Bland, EEB). Additional discussion on the technical basis of the Technical Specification revision is also provided in the Safety Evaluation.

> Original Signed by Brian K. Grimes

Brian K. Grimes, Chief Environmental Evaluation Branch

Enclosure:

cc	: V. Stello D. Eisenhut R. Vollmen	L. Higgenbotham A. Gibson, Region	Centr	IBUTION al files dg	BGrimes JGuibert RCudlin
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