



UNITED STATES  
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Region II, Directorate of Regulatory Operations

REVISION OF THE REPORTING REQUIREMENTS OF APPENDIX B TECHNICAL SPECIFICATIONS  
FOR OCONEE NUCLEAR STATION, UNITS 1 AND 2 (DOCKET NOS. 50-269 AND 50-270,  
LICENSE NOS. DPR-38 AND DPR-47)

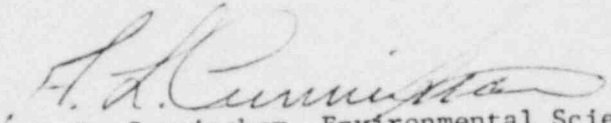
The Oconee Non-Radiological Environmental Technical Specifications have no reporting requirements for violations involving limiting conditions for operations or incidents of major environmental impact other than the semi-annual report as defined in Section 1.0. In preparation for the non-radiological environmental inspection conducted November 27-30, 1973, a detailed review of the Oconee Semi-Annual Report for the period ending June 30, 1973, was conducted. This review revealed twenty-five separate occurrences in which the pH limits defined under Chemical Discharge Limits in Section 1.2(B) were exceeded. Other occurrences of less import were identified; however, none of these were reported prior to issuance of the subject Semi-Annual Report.

Until such time that these specifications are revised to include nonroutine reporting requirements (e.g., those defined in Section 5.6.2(c) of Draft Guide For The Preparation of Environmental Technical Specifications For Nuclear Power Plants, October 1973) and the necessary administrative controls assuring that all specifications are implemented as defined, it is obvious that meaningful inspections cannot be conducted. Further, the technical specifications involved cannot be effectively enforced.

The licensee states in the February 19, 1973, final response to Item 1.A.2 - Reporting Requirements, contained in RO Report No. 50-269/73-13 that the current reporting practice is in compliance with Section 1.0 of Appendix B Technical Specifications, but holds that they have informally advised the AEC principal inspector for Oconee of any unusual conditions involving the non-radiological environmental technical specifications. I have discussed this problem with the Environmental Project Manager for Oconee (Environmental Projects, Branch No. 3, Directorate of Licensing)

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on many occasions prior to the inspection summarized in the above referenced report. Resolution of the problem is promptly required if the technical specifications are to be routinely enforced.



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