

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

August 8, 1974

Mr. Norman C. Moseley, Director
Directorate of Regulatory Operations
U. S. Atomic Energy Commission
Region II-Suite 818
230 Peachtree Street, N. W.
Atlanta, Georgia 30303

Re: RO:II:FJ
50-270/74-4

Dear Mr. Moseley:

Please find attached our response to Items I.A.1.a and I.A.2.a & b contained in RO Inspection Report 50-270/74-4.

Duke Power Company does not consider any information contained in RO Inspection Report 50-270/74-4 to be proprietary.

Very truly yours,

Paul H. Barton
A. C. Thies *For A.C.T.*

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DUKE POWER COMPANY
OCONEE UNIT 2
RESPONSE TO RO INSPECTION REPORT 50-270/74-4

I.A.1.a MODIFICATIONS IMPLEMENTED WITHOUT REVIEW BY NUCLEAR SAFETY REVIEW COMMITTEE

During a June 4-5, 1974 meeting, the Nuclear Safety Review Committee discussed with Mr. Frank Jape, AEC/RO:II, the committee's review of modifications involving an unreviewed safety question. As a result of that meeting the committee concluded that modifications or changes that involve an unreviewed question should be reviewed by the committee; however, the NSRC should not be the agency which makes the determination that a proposed modification or change does or does not constitute an unreviewed safety question. While the NSRC did not agree with Mr. Jape's interpretation of Technical Specification 6.1.2.2, it did recommend that the wording of the specification be changed to better reflect their understanding of its intent. On June 19, 1974, a proposed change to Technical Specification 6.1.2.2 was transmitted to AEC/DOL for approval. Simultaneously, ongoing discussions were held with company management to consider what methods might be appropriate for the NSRC to review specifications and changes until the technical specification change was approved. On July 19, 1974, AEC/DOL issued the revised technical specification.

Consequently, Technical Specification 6.1.2.2.i.2 requires the committee to review "proposed changes in equipment or systems which constitute an unreviewed safety question . . . or which are referred by the operating organization". Under the present administrative controls only changes and modifications which are deemed to constitute an unreviewed safety question by the station superintendent or items which the superintendent may wish to submit are being reviewed by the NSRC. The NSRC, however, will selectively and periodically audit station modifications to assure that the determination by the station superintendent is accurate.

I.A.2.a TRANSFER OF BYPRODUCT MATERIAL

To assure full compliance with 10CFR30.41 (c), prior to any shipment of non-exempt quantities of radioactive material, station personnel will verify that the type, form, and quantity of material can be received by the transferee, using the verification methods listed in Paragraph (d) of 10CFR30.41.

I.A.2.b ACTIVITY IN THE COMPONENT COOLING SYSTEM

Technical Specification 6.2.1 requires, in part, that abnormal occurrences, as defined in Section 1.0 of the technical specifications, be reported to the AEC. Paragraph f. of Section 1.8 of the technical specifications defines abnormal occurrence as the occurrence of any plant condition that results in abnormal degradation of one of the several boundaries designed to contain radioactive materials resulting from the fission process. In this instance, abnormal degradation would involve a boundary between the Reactor Coolant System and the Component Cooling System. Thus far, there is no evidence that this is the case. No

correlation can be made between the activity in the Component Cooling System and reactor power or Reactor Coolant System activity. Nor can any correlation be made between the operation of a particular cooler which interfaces the Component Cooling System and the Reactor Coolant System.

It appears that the source of this activity is the liquid waste disposal header, which has a piping tie to the Component Cooling System drain tank. Valve leakage would allow waterborne activity from the waste disposal header to enter the Component Cooling System. Preparations are being made to isolate this piping tie between the tank and header to determine if this is the source of activity in the Component Cooling System.