

DUKE POWER COMPANY

POWER BUILDING

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

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

April 6, 1981

TELEPHONE: AREA 704
373-4083

Mr. James P. O'Reilly, Director
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Re: RII:DMM
50-269/80-36
50-270/80-32
50-287/80-29

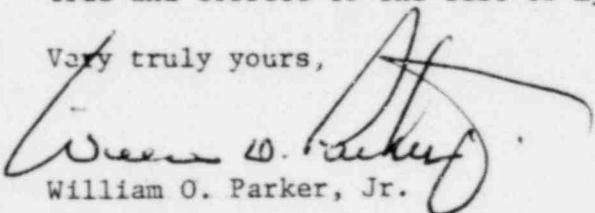
Dear Mr. O'Reilly:

On February 27, 1981, a letter was submitted to your office by Mr. A. C. Thies, Senior Vice President, transmitting the responses to the cited items of non-compliance of the subject inspection report. Mr. D. M. Montgomery of your office requested additional action concerning the response to Violation B, Item 1.

Please find attached a revised response to Violation B of the subject inspection report.

I declare under penalty of perjury that the statements set forth herein are true and correct to the best of my knowledge, executed on April 6, 1981.

Very truly yours,


William O. Parker, Jr.

JLJ:pw
Attachment

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DUKE POWER COMPANY
OCONEE NUCLEAR STATION

Revised Response to IE Inspection Report 50-269/80-36, -270/80-32, -287/80-29
Violation B

Violation

Item B: Technical Specification 6.4.1 requires that the station be operated and maintained in accordance with approved procedures and that written procedures with applicable checkoff lists be maintained for radiation control procedures, operation of radioactive waste management system, and nuclear safety-related periodic test procedures.

Contrary to the above, the station was not operated in accordance with written approved procedures in that (1) during the period of September 10, 1980 to December 10, 1980, the daily performance checks were not performed in the manner specified by Procedure HP/O/B/1000/67; (2) on February 6, 1980 and other occasions, the accuracy performance checks for boron analysis were out of limits and were not repeated as required by Procedure CP/O/B/100/3; and (3) during 1980 some precision control charts for phosphate, boron, and chloride analysis were not dated as required by Procedure CP/O/B/100/3.

This is a Severity Level V Violation (Supplement I.E.).

Response

Item 1: This item resulted from an administrative/procedural deficiency. The calibration procedure HP/O/B/1003/08 had previously had its performance criteria revised. The QA/QC procedure HP/O/B/1000/67, which covers the same operation, had not been similarly revised to include the new criteria. This procedure was revised on December 24, 1980, to provide performance continuity between the two related procedures.

Oconee HP will purchase vendor-supplied standards to be used as daily check sources. Upon receipt of these sources, HP will discontinue use of external standard ratio methods of measuring instrument performance. Though the vendor has not provided a shipping date for these standards, it is anticipated that the standards should be received by August 1, 1981.

Items
2 & 3:

The procedure CP/O/B/100/3 was deficient in that it did not specifically address a method for documenting corrective action taken when an analysis exceeded control limits. While the documentation of the required rechecks was not performed, we are confident that the rechecks were performed as required. In addition, personnel involved did not properly date or check charts in the procedure. All personnel involved have been counseled on their deficiencies, and all appropriate personnel have been trained on proper use of the precision and accuracy control charts. Procedure CP/O/B/100/3 is being revised to assure adequate quality control in its use and associated documentation. Training will be given to all appropriate personnel on the revised procedure. The procedure revision and training will be completed by May 1, 1981.