

DUKE POWER COMPANY

POWER BUILDING

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

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

February 11, 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:CMH
50-269/80-31
50-270/80-27
50-287/80-24

Dear Sir:

With regard to James P. O'Reilly's letter of January 20, 1981 which transmitted the subject inspection report, Duke Power Company does not consider the information contained therein to be proprietary.

Please find the attached response to the cited items of noncompliance and significant findings.

Very truly yours,

William O. Parker, Jr.
by *JLS*

William O. Parker, Jr.

JLJ:pw
Attachment

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DUKE POWER COMPANY
OCONEE NUCLEAR STATION

Response to IE Inspection Reports 50-269/80-31, -270/80-27, -287/80-24

Significant Finding A

The instrumentation used for contamination monitoring of personnel does not have the necessary sensitivity to assure that personnel exiting the radiation controlled area are not contaminated above the station limit. The minimum detectable contamination level for the RM-14 with pencil probe used for contamination monitoring was approximately twice the station limit.

Response

This finding resulted from the use of "pencil probes" on the RM-14 friskers which were not sufficiently sensitive. Station personnel had already replaced some pencil probes with the limited available number of more sensitive HP-210 "pancake" probes prior to the inspection. At the inspector's suggestion these more sensitive instruments were placed at high-volume personnel traffic RCA exits. An order for HP-210 probes and holders for the remaining RM-14 monitors was expedited. The new probes were received and installed on monitors at all normally utilized RCA exits.

Significant Finding B

The safety evaluation performed to determine if the operation of the contaminated auxiliary boiler was acceptable (i.e., does not involve an unreviewed safety question or a change to Technical Specifications) did not include the following elements specified by IE Bulletin 80-10: (1) consideration of levels of contamination, (2) an assessment of potential releases of radioactivity to the environment, or (3) comparison of such releases with the radioactive effluent limits of 10CFR20 and the facility's Technical Specifications.

Response

A revised safety evaluation on operation of the contaminated auxiliary boiler has been performed and includes the following:

1. Activity of the water in the boiler was $Cs^{134} = 1.1E^{-7}$ and $Cs^{137} = 5.5E^{-7}$, which is less than 10CFR20 Appendix B, Table II limits. Based on 4000 gallons of water in the boiler, a dose of $1.08E^{-5}$ mRem would result when released at a flow rate of 100 gpm with normal hydro dilution flow. This would present no hazard to individuals in the environment.
2. Activity of contamination in the boiler mud drum was determined from samples of both loose contamination and fixed contamination scraped from the inner surfaces. Dose calculations indicate that if an individual was standing at the site boundary downwind of the smokestack simultaneously with a boiler tube rupture, that person would receive a maximum whole body dose of 0.2 mRem. This dose would not be hazardous.

Violation A

As required by 10CFR50.59, the holder of a license authorizing operation of a production or utilization facility may make changes in the facility as described in the safety analysis report, without prior Commission approval, unless the proposed change involves a change in the technical specifications incorporated in the license or an unreviewed safety question. The licensee shall maintain records of changes in the facility which shall include a written safety evaluation which provides the basis for the determination that the change does not involve an unreviewed safety question.

Contrary to the above, on September 11, 1980, lead shielding was observed on Unit 1, pressurizer spray line near RC-1. The shielding had been installed without performing a safety evaluation to determine that the installation did not involve an unreviewed safety question.

This is an infraction.

Response

The lead shielding cited was removed immediately after discovery by the inspector. The shielding should have been removed at the end of a previous outage but had been overlooked during a building tour intended to remove temporary shielding. After the cited shielding was discovered, HP personnel inspected the reactor building to assure no other temporary shielding had inadvertently been left in place.

There has been no procedure or directive available at the station which addresses the static and dynamic loading of shielding on safety related equipment, criteria for use of temporary shielding, and surveillance and removal of temporary shielding. A station directive on shielding has been written to include these items. This directive was approved for use on January 27, 1981.

Violation B

As required by Technical Specification 6.4, the station shall be operated and maintained in accordance with approved procedures. Station Procedure HP/O/B/1000/09, Procedure for Removal of Items From Radiation Control Zones (RCZ) or From Radiation Control Areas (RCA) requires that all potentially radioactive tools, equipment, and waste is to be wrapped and/or bagged and tagged when removed from the work area.

Contrary to the above, on September 14, 1980, an inspector observed six used liquid filters laying on the floor near the door to Room 118 (Units 1 and 2 LPI/HPI Hatch Area) which were not wrapped, bagged or tagged. The filter was highly contaminated (approximately 10 mR/Hr each).

This is an infraction.

Response

This item resulted from inadequate communications between HP and Maintenance personnel. The filters had originally been bagged when first removed from the HPI room. Since the filters were still wet, the HP technician involved instructed the Maintenance mechanics to return the filters to the HPI room, remove the bags, and let the filters dry out prior to re-bagging and disposal.

The mechanics misunderstood these instructions and left the un-bagged filters outside the HPI room to dry. The filters were properly disposed of subsequent to discovery by the inspector.

The mechanics and technician involved have been cautioned about the importance of maintaining proper control of radioactive material. In addition, a letter dated February 4, 1981 on proper controls of radioactive materials removed from Radiation Control Zones Or Areas was written to the management of all groups involved with this type work at the station. This information will be reviewed by all appropriate personnel.