



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

JAN 20 1981

In Reply Refer To:
RII:CMH
50-269/80-31
50-270/80-27
50-287/80-24

Duke Power Company
ATTN: W. O. Parker, Jr.
Vice President, Steam Production
P. O. Box 2178
Charlotte, NC 28242

Gentlemen:

Subject: Health Physics Appraisal

During the period of September 8-19, 1980, NRC conducted a special appraisal of the health physics program at the Oconee facility. This appraisal was performed in lieu of certain routine inspections normally conducted in the area of health physics. Areas examined during this appraisal are described in the enclosed report (50-269/80-31, 50-270/80-27, and 50-287/80-24). Within the areas, the appraisal team reviewed selected procedures and representative records, observed work practices, and interviewed personnel. It is recommended that you carefully review the findings of this report for consideration in improving your health physics program.

The appraisal conducted at the Oconee facility was part of the NRC's general program to strengthen the health physics program at nuclear power plants. As a first step in this effort, the Office of Inspection and Enforcement is conducting these special appraisals of the health physics programs at all operating power reactor sites. These appraisals were previously identified to you in a letter dated January 22, 1980, from Mr. Victor Stello, Jr., Director, NRC Office of Inspection and Enforcement. One of the objectives of the health physics appraisals is to evaluate the overall adequacy and effectiveness of the total health physics program at each site and to identify areas of weakness that need to be strengthened. We also intend to use the findings from these appraisals as a basis for improving NRC requirements and guidance. Consequently, our appraisal encompassed certain areas which may not be explicitly addressed by current NRC requirements. The next step that is planned in this overall effort will be the imposition of a requirement by the Office of Nuclear Reactor Regulation (NRR) that all licensees develop, submit to the NRC for approval, and implement a Radiation Protection Plan. Each licensee will be expected to include in the Radiation Protection Plan sufficient measures to provide lasting corrective action for any significant weaknesses identified during the special appraisals of the current health physics program. Guidance for the development of this plan will incorporate pertinent findings from the special appraisals and will be issued for public comment prior to the end of this calendar year.

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The findings of this appraisal at the Oconee facility indicate that, although your overall health physics program is adequate for present operations, significant weaknesses exist. These include the following:

- a. instrumentation used to monitor personnel for contamination does not have the sensitivity necessary to assure that personnel are not exiting the radiation control area contaminated above the station limit; and
- b. the safety evaluation performed to determine if the operation of the contaminated auxiliary boiler was acceptable did not include an assessment of the consequences of potential release of radioactivity to the environment nor did it include a comparison of such releases with the radioactive effluent limits of 10 CFR 20 and the facility's Technical Specifications.

These findings are discussed in more detail in Appendix A, "Notice of Significant Appraisal Findings". We recognize that regulatory requirements pertaining to the significant weaknesses identified in Appendix A may not currently exist. However, to assist us in determining whether adequate protection will be provided for the health and safety of workers and the public, you are requested to submit a written statement within twenty (20) days of your receipt of this letter describing your corrective action for the significant weaknesses identified in Appendix A, including: (1) steps which have been taken; (2) steps which will be taken; and (3) a schedule for completion of action. This request is made pursuant to Section 50.54(f) of Part 50, Title 10, Code of Federal Regulations.

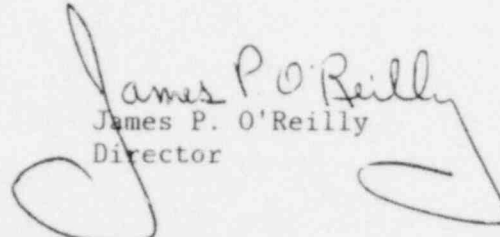
The findings of this appraisal also indicate certain activities which apparently were not conducted in full compliance with NRC requirements as set forth in the Notice of Violation enclosed herewith as Appendix B. The items of noncompliance in Appendix B have been categorized into the levels of severity as described in our Criteria For Enforcement Action dated December 1, 1974. Section 2.201 of Part 2, Title 10, Code of Federal Regulations, requires you to submit to this office, within twenty (20) days of your receipt of this notice, a written statement or explanation in reply including: (1) corrective steps which have been taken by you and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance; and (3) the date when full compliance will be achieved.

In accordance with Section 2.790 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosures will be placed in the NRC's Public Document Room. If this material contains any information that you believe to be proprietary, it is necessary that you make a written application within 20 days to this office to withhold such information from public disclosure. Any such application must be accompanied by an affidavit executed by the owner of the information, which identifies the document or part sought to be withheld, and which contains a statement of reasons which addresses with specificity the items which will be considered by the Commission as listed in Subparagraph (b)(4) of Section 2.790. The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified period, this letter and the enclosures will be placed in the Public Document Room.

JAN 20 1981

Should you have any questions concerning this appraisal, we will be pleased to discuss them with you.

Sincerely,


James P. O'Reilly
Director

Enclosures:

1. Appendix A, Notice of Significant Findings
2. Appendix B, Notice of Violation
3. Office of Inspection and Enforcement
Inspection Report Nos. 50-269/80-31,
50-270/80-27, and 50-287/80-24

cc w/encl:

J. E. Smith, Station Manager

APPENDIX A

NOTICE OF SIGNIFICANT FINDINGS

Duke Power Company
Oconee Facility

License Nos. DPR-38, DPR-47
and DPR-55

Based on the Health Physics Appraisal conducted September 8-19, 1980, the following items appear to require corrective action:

- 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.
- 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 10 CFR 20 and the facility's Technical Specifications.