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HAL B. TUCKER vice president nuclear production

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October 18, 1982

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

Re: Oconee Nuclear Station Docket No. 50-287

Dear Mr. O'Reilly:

Please find attached Reportable Occurrence Report RO-287/82-10. This report is submitted pursuant to Oconee Nuclear Station Technical Specification 6.6.2.1.a(2) which concerns an operation subject to a limiting condition for operation which was less conservative than the least conservative aspect of the limiting condition for operation established in the Technical Specifications, and describes an incident which is considered to be of no significance with respect to its effect on the health and safety of the public.

Very truly yours,

Hal & Incher /

JCP/php Attachment

cc: Document Control Desk U. S. Nuclear Regulatory Commission Washington, D. C. 20555

> Mr. W. T. Orders NRC Resident Inspector Oconee Nuclear Station

> INPO Records Center Suite 1500 1100 Circle 75 Parkway Atlanta, Georgia 30339

Mr. Philip C. Wagner Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D. C. 20555

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DUKE POWER COMPANY OCONEE NUCLEAR STATION

Report Number: RO-287/82-10

Report Date: October 18, 1982

Occurrence Date: October 4, 1982

Facility: Oconee Unit 3, Seneca, South Carolina

Identification of Occurrence: Unit 3 weekly Borated Water Storage Tank (BWST) boron sample was not taken on the routine scheduled date as was required per Technical Specification 4.1.3.

Conditions Prior to Occurrence: 40% Full Power - Startup

<u>Description of Occurrence</u>: On October 4, 1982 at 1125, it was discovered by a Station Chemist following an independent verification program that the Unit 3 weekly Borated Water Storage Tank (BWST) boron sample was not taken as was required per Technical Specification 4.1.3.

Technical Specification Table 4.1.3, Item 2, requires boron sampling of the BWST on a weekly basis. This weekly sampling requirement may be waived if the unit has been in cold shutdown for more than one week. Per Technical Specification 4.0.3, however, the BWST weekly sampling program must be reinstated prior to heating up above cold shutdown.

The last boron sample of the BWST, prior to the Technical Specification violation, was taken on September 22, 1982 (unit at cold shutdown). Per Technical Specification Table 4.1.3, Item 2, the next sample was due on September 29, 1982. Per Technical Specification 4.0.2, this same sample had to be taken by September 29, 1982 in order to prevent a Technical Specification violation.

Apparent Cause of Occurrence: The primary cause of this occurrence was due to administrative error in that the responsible personnel did not perform the required routine surveillance and take the boron samples. Listed below are other contributing factors to the incident's occurrence:

- There are some instances in which the sample taking requirement may be waived. Some of the chemistry personnel involved misunderstood the exact status of the sample requirement when the unit is "shutdown". This, rlus the fact that there was a reduced, work laden lab staff on the day the sample was due, contributed to the missed surveillance going unnoticed.
- Station Chemistry has a program which independently verifies that Technical Specification samples have been taken per the routine surveillance schedule using an independent check. This check is scheduled to be done on Fridays but was missed October 1, 1982, and instead, was performed on Monday, October 4, 1982. It was at the time the missed boron sample tests were noted.
- 3. Chemistry personnel, who take the boron samples and other samples, were

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> working in a temporary lab which did not include their large acrylic "sample board" which identified all the primary Technical Specification samples, date last taken, and date due. If present, the board would have reduced the chance that the surveillance would have been missed.

Analysis of Occurrence: There was only one make-up to the BWST during the interim between September 22, 1982 and October 4, 1982 BWST boron samples. Both BWST boron sample results indicated boron concentration above the minimum acceptable concentration. Therefore, the BWST boron concentration was never below the minimum acceptable concentration. It is concluded that the health and safety of the public were not compromised.

<u>Corrective Action</u>: Once it was determined that the BWST Technical Specification surveillance period had expired and the unit was under a limiting condition for operation per Technical Specification 3.2.2, operators began to reduce power at 10 percent/hour. After it was determined, via a boron sample, that the Unit 3 BWST boron concentration was greater than the required concentration, the unit shutdown process was terminated.

The Station Chemist and the Chemistry Technicians involved have been counseled. Administrative changes are being implemented within the Chemistry section to make clear the exact status/frequency requirements of the BWST boron sample tests. The primary Chemistry first line supervisor will begin to verify that Technical Specification surveillances are met using the existing sample verification program. The acrylic sample board has been placed in the temporary primary Chemistry lab.