

DUKE POWER COMPANY

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HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

TELEPHONE
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97 JUL 27 AIO: OJ
July 20, 1984

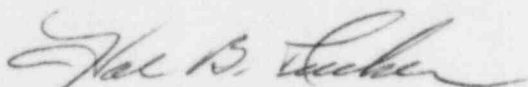
Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Subject: Oconee Nuclear Station
IE Inspection Report
50-269/84-12
270/84-12
287/84-14

Dear Sir:

In response to your letter dated June 22, 1984 which transmitted the subject Inspection Report, the attached responses to the cited items of non-compliance are provided. I declare under penalty of perjury that the statements set forth herein are true and correct to the best of my knowledge on July 20, 1984.

Very truly yours,



Hal B. Tucker

JCP/rhs

Attachment

cc: Mr. J. C. Bryant
NRC Resident Inspector
Oconee Nuclear Station

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PDR ADOCK 05000265
Q PDR

Violation

10 CFR 71.87(g) requires that prior to each shipment of licensed material, the licensee shall ensure that the package with its contents satisfies the applicable requirements of this part and of the license. The licensee shall determine that, for fissile material, any moderator or neutron absorber, if required, is present and in proper condition.

NRC Certificate of Compliance number 9010 for the NLI 1/2 fuel shipping cask requires that the neutron shielding tank be filled with a mixture of water and ethylene glycol.

Contrary to the above, the moderator for the NLI 1/2 cask was not determined to be present and in proper condition prior to using the cask to ship sixteen irradiated fuel pins, a Fissile Class III shipment, to the Babcock and Wilcox Lynchburg Research Center on February 3, 1984, under shipment control number 84-19.

This is a Severity Level IV Violation (Supplement V).

Response

1. Admission or denial of the alleged violation:

This violation is correct. In the specific instance cited, moderator condition was checked in January, 1984, prior to shipment of the cask from B & W to Oconee but was not checked at Oconee immediately prior to shipment back to B & W in February. However, the annual Periodic Maintenance performed on the cask in June, 1984, verified that the moderator tank was full of the proper mixture.

2. Reasons for the violation:

The station procedure for Spent Fuel Shipment (OP/O/A/1510/10) did not address checking the neutron shield tank prior to each shipment.

3. Corrective actions taken and results:

A revision to procedure OP/O/A/1510/10 has been written to require a neutron shield tank level check prior to off-site shipments via the NLI-1 or 2 casks.

4. Corrective actions to be taken to avoid further violations:

No further corrective actions are considered necessary.

5. Date when full compliance will be achieved:

The procedure revision noted in (3) above will be approved by July 31, 1984.

Violation

10 CFR 20.201(b) requires each licensee to make or cause to be made such surveys as may be necessary for the licensee to comply with the regulations and are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present.

Contrary to the above, surveys to evaluate the extent of neutron radiation hazards that may have been present were not performed in that:

- a. No neutron radiation surveys were performed during the loading and prior to shipping the NLI 1/2 fuel shipping cask containing sixteen irradiated fuel pins to the Babcock and Wilcox Lynchburg Research Center on February 3, 1984, under shipment number 84-19.
- b. During the period April 5, 1984 to June 5, 1984, eleven fuel transfers were performed between the Units 1 and 2 and Unit 3 spent fuel pools using the NAC fuel cask. No neutron radiation surveys were performed until the sixth transfer on May 21, 1984.

This is a Severity Level V violation (Supplement IV).

Response

1. Admission or denial of the alleged violation:

This violation is correct as stated.

2. Reasons for the violation:

Both examples of this violation occurred due to personnel error. In (a), the need for a neutron survey was not addressed by appropriate personnel during preparation of the applicable Radiation Work Permit (RWP) and Standing Radiation Work Permit. In (b), the survey requirement in the RWP was not properly followed by the HP technician covering the fuel transfers.

3. Corrective actions taken and results:

HP technicians assigned to cover fuel handling have been made aware of the applicable RWP requirements and the importance of adhering to them.

4. Corrective actions to be taken to avoid further violations:

Appropriate HP personnel will review this violation, 10CFR20.201(b), and the station procedure for Issuance, Revision, and Termination of Radiation Work Permits and Standing Radiation Permits. The need to evaluate all radiological conditions with respect to the task being performed will be emphasized, particularly the need for neutron or other special surveys when working with spent fuel or related components. The SRWP for Shipment of Radioactive Materials will be revised to note the need for special surveys when required.

Appropriate portions of these actions will also be incorporated into the site-specific training program for vendor HP technicians.

5. Date when full compliance will be achieved:

All corrective actions noted above will be completed by August 15, 1984.