DUKE POWER COMPANY
P.O. BOX 33189
CHARLOTTE, N.C. 28242

HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

TELEPHONE
(704) 373-4531

February 15, 1985

Dr. J. Nelson Grace, 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
50-269/84-30
50-270/84-29
50-287/84-32

Dear Sir:

In response to your letter dated January 16, 1985 which transmitted the subject Inspection Report, the attached response to the cited item of non-compliance is provided. I declare under penalty of perjury that the statements set forth herein are true and correct to the best of my knowledge on February 15, 1985.

Very truly yours,

H.B. Tucker BY

Hal B. Tucker

SGG:slb

Attachment

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

Violation 1

10 CFR 20.201(b) requires the licensee to perform such surveys as (1) are necessary to demonstrate compliance with 10 CFR 20.106 which limits the release of radioactivity to unrestricted areas and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present.

Technical Specification 6.4.1 requires the station to be operated and maintained in accordance with approved procedures. Written procedures with appropriate checkoff lists are required for operation of the waste management systems.

Contrary to the above, procedures for analysis of tritium in liquid effluent samples and calibration of Ge-Li detectors for the analysis of gaseous effluents did not provide for adequate analysis in conformance with 10 CFR 20.201(b) survey requirements in that:

(a) HP/0/1000/62/0 "Procedure for Sampling and Analyzing the Discharge from the Chemical Treatment Pond #3", Rev. 3, 1984 did not detail methodology to remove other potential radionuclide contaminants in liquid samples prior to tritium analysis. Failure to remove other radionuclides would result in inaccurate tritium measurements.

(b) HP/0/1003/09 "Procedure for 6600 Calibration of Ge-Li Detectors on the Nuclear Data System: Rev. 4, 3/16/84, did not provide sufficient detail for gamma spectroscopy annual calibrations. The failure to properly review and verify all annual calibration data resulted in inaccurate gaseous effluent measurements.

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

Response

(1) Admission or denial of the alleged violation:

This violation is correct as stated.

(2) Reasons for the violation:

The violation was the result of procedural deficiencies.

(3) Corrective actions taken and results:

The procedures noted have been reviewed and corrective actions are being taken. For Procedure HP/0/B/1003/09, previous calibration data for affected geometries was found to be within tolerance (less than one year old). This data was restored and the erroneous data was destroyed.

(4) Corrective actions to be taken to avoid further violations:

a) Procedure HP/0/B/1000/62/0 will be revised to delete references to airborne tritium sample preparation, and to add reference to the Chemistry procedures for ion exchange and distillation sample preparation. Vendor lab services will be notified to ensure distillation or equivalent is performed prior to analysis of tritium samples.

b) Procedure HP/0/B/1003/09 will be revised to require review of all calibration data relative to previous calibrations and specify action when problems are detected. All technicians responsible for implementing this procedure will be instructed as to routinely encountered problems with gas calibrations.

(5) Date when full compliance will be achieved:

The corrective actions noted in (4)(a) above will be completed by March 1, 1985.

The corrective actions noted in (4)(b) above will be completed by March 15, 1985.

Violation 2

Technical Specification Table 4.1-3 requires the analysis of Xe-138 in gaseous waste samples at a Lower Limit of Detection (LLD) of 1E-4 microcuries per cc.

Contrary to the above, during the period from January through December 1984, there were numerous examples of failure to achieve the required LLD for Xe-138 due to the excessive decay time between sampling and analysis.

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:

The violation was the result of procedural deficiencies. The procedure for sampling and analysis of the waste gas decay tank prior to release did not require calculation of maximum time lapse between sampling and analysis.

(3) Corrective actions taken and results:

A review of standard operating methods revealed that LLD's were missed only during operation in a degraded mode where number of samples was greatly increased. The Health Physic Shift Supervisors have been re-instructed on the selection of priority analyses.

Review has also revealed that the sampling and analysis procedures for the Reactor Building Purge and the Unit Vent systems did not require calculation of maximum time lapse between sampling and analysis.

(4) Corrective actions to be taken to avoid further violations:

Procedures HP/0/B/1000/60A (Waste Gas Decay Tank), HP/0/B/1000/60B (RB Purge), and HP/0/B/1000/60D (Unit Vent) will be revised to reflect maximum time lapse between sampling and analysis.

(5) Date when full compliance will be achieved:

The procedures noted in (4) above will be revised by March 15, 1985.