

OCT 05 1984

Duke Power Company
ATTN: Mr. H. B. Tucker, Vice President
Nuclear Production Department
422 South Church Street
Charlotte, NC 28242

Gentlemen:

SUBJECT: REPORT NOS. 50-369/84-07 AND 50-370/84-07

Thank you for your response of August 2, 1984, to our Notice of Violation issued on July 3, 1984, concerning activities conducted at your McGuire facility. We have evaluated your response and found that it meets the requirements of 10 CFR 2.201. We will examine the implementation of your corrective actions for Violation Nos. 2, 3, and 4 during future inspections.

After careful consideration of the basis for your denial of the first Violation, we have concluded that the violation occurred as stated in the Notice of Violation, except that example C of this violation is withdrawn due to its interdependence with example B. Your stated reason for denial was that your Post Accident Sampling System (PASS) design was almost complete before NUREG-0737 was published. However, the Unit 2 license condition 2.C.10 required your PASS to be operable, e.g., capable of providing data for the parameters stated in NUREG-0737, Item II.B.3.

Although you denied the violation, your letter stated that modifications of the PASS were being made which would ensure that the system could accurately analyze for chlorides and dissolved hydrogen.

Based on a telephone conversation on September 14, 1984, between Mr. H. C. Dance of this office and Mr. R. L. Gill of your staff, and subsequent conversations between the NRC Region II and Duke Power Company staffs, it is our understanding that the following actions will be accomplished by November 1, 1984, for Unit 1:

1. PASS modifications will be completed such that the system will be capable of obtaining a representative sample of reactor coolant so that the following analyses will be possible within the accuracy specified:
 - a. Gross activity (gamma spectrum of the fission product gases or fission products in the coolant measured to estimate core damage): These analyses shall be accurate within a factor of two over the range of coolant activity 1 μ Ci/gm - 10Ci/gm.
 - b. Boron: This analysis shall be accurate within $\pm 10\%$ of the measured value. The $\pm 10\%$ accuracy for this analysis accounts for inaccuracies in sample dilution and laboratory analysis technique. For concentrations below 500 ppm, the tolerance band should remain at ± 50 ppm.

8410230382 841005
PDR ADOCK 05000369
Q PDR

IE06 11

- c. Chlorides: For concentrations between 0.5 and 20.0 ppm chloride, the analysis shall be accurate within $\pm 10\%$ of the measured value. At concentrations below 0.5 ppm, the tolerance band remains at ± 0.05 ppm.
 - d. Hydrogen: For concentrations less than or equal to 50 cc/kg, the analysis shall be accurate within ± 15 cc/kg. For concentrations between 50 cc/kg and 2000 cc/kg, the analysis shall be accurate within ± 20 percent.
 - e. Oxygen: The smallest concentration measurable should be at least ppb. Concentrations above 250 ppb should be accurate within ± 10 percent. Analysis for dissolved oxygen is recommended by NUREG-0737 but is not a requirement.
 - f. pH: Between a pH of 5 to 9, the reading shall be accurate within ± 0.3 pH units. For all other ranges, ± 0.5 pH units is acceptable.
2. Operability tests of the installed system will be conducted to ensure that the NUREG-0737, Item II.B.3 parameters can be measured with the accuracy and sensitivity stated in action (1) above. When parameters such as oxygen or chlorides are not present in the undiluted sample, an evaluation shall be performed to ensure the indicated accuracy could be met for the diluted sample.

Please submit to this office within 30 days of the date of this letter a report describing the status of the units 1 and 2 PASS modifications and providing estimated completion dates for incomplete actions.

If your understanding of these actions is different from that stated above, please inform this office immediately.

The response directed by this letter is not subject to the clearance procedures of the Office of Management and Budget issued under the Paperwork Reduction Act of 1980, PL 96-511.

Sincerely,

James P. O'Reilly
Regional Administrator

cc: M .C. McIntosh, Plant Manager
C. F. York, Division Manager

bcc: Senior Resident Inspector
Document Control Desk
State of North Carolina

RII	RII	RII	RII	RII	RII		
<i>RH Albright</i>	<i>SRJ</i>	<i>eme</i>	<i>R</i>	<i>VB</i>	<i>HD</i>		
RA Albright:km	G Jenkins	DCollin	JPStohr	MPuckett	VBrownlee	HDance	RC Lewis
09/2/84	10/2/84	10/2/84	10/4/84	9/3/84	9/4/84	9/4/84	10/5/84
10				10	10		10/5