

ENCLOSURE 1

NOTICE OF VIOLATIONS

Duke Power Company
McGuire 1 and 2

Docket Nos. 50-369 and 370
License Nos. NPF-9 and NPF-17

The following violations were identified during an inspection conducted on April 2-6, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. License condition 2.C.10, NUREG-0737 conditions, for Unit 2 requires that a high-radiation sampling system for obtaining reactor coolant samples under degraded core accident conditions shall be operable prior to exceeding 5% power. The facility Technical Specification 1.18 defines a system, subsystem, train, component or device to be operable when it is capable of performing its specified functions.

NUREG-0737, Item II.B.3, specifies that the reactor coolant post accident sampling system shall be capable of analyzing reactor coolant samples for chlorides, dissolved hydrogen, certain radionuclides (e.g., noble gases), and boron.

Contrary to the above, the reactor coolant post accident sampling system was not operable prior to Unit 2 exceeding 5% power during May 1983 in that:

- a. The system is unable to provide a representative reactor coolant sample for the purpose of measuring chlorides in the coolant. All reactor coolant samples drawn from the system are contaminated with chlorides during sampling.
- b. The Unit 2 system has not demonstrated the ability to reliably provide a reactor coolant gas sample for the purpose of measuring dissolved hydrogen. Only one monthly test, March 1984, indicated an acceptable result.
- c. On April 5, 1984, a Unit 2 reactor coolant noble gas sample was not demonstrated to be representative of dissolved noble gases in the reactor coolant. The ^{135}Xe concentration determined from this test was a factor of 20 below the actual concentration in the coolant.

This is a Severity Level IV violation (Supplement I)
(Applicable to Unit 2 only)

2. 10 CFR 20.201(b) requires that each licensee shall make or cause to be made such surveys as may be necessary for the licensee to comply with the regulations in this part. A "survey" is defined in 10 CFR 20.201(b) as evaluation of the radiation hazards incident to the production, use,

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release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of circumstances. 10 CFR 20.202 requires each licensee to provide individuals with personnel monitoring devices under specified conditions to provide information used as part of such surveys.

Contrary to the above, the requirement to perform an evaluation was not met in that during August 1983, a thermoluminescent dosimeter (TLD) reader malfunctioned and the TLD reader operator assigned the individual the pocket dosimeter (PD) totals from the computer record. No determination as to the accuracy or completeness of the computer record was made prior to assigning the exposure.

This is a Severity Level IV violation (Supplement IV).
(Applicable to Units 1 and 2)

3. Technical Specification 6.11 requires that procedures for radiation protection be prepared consistent with the requirements of 10 CFR 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

Health Physics Manual Section 2.2, step 2.2.5 requires personnel to turn in dose cards on days when they enter the Radiation Control Area.

Health Physics Procedure HP/O/B/1000/03, Investigation of Potential Over-exposure, requires that when an exposure investigation is performed, the individual's dose card will be retained until the exposure investigation is complete so that the exposure will be entered on the card.

Contrary to the above, the requirement to have procedures for personnel radiation protection and to adhere to such procedures was not met in that:

- a. Dosimetry procedure DL/O/B/1100/01 step 4.6.8 permits the pocket dosimeter totals on the computer to be assigned as an individual's exposure when the TLD result is not available although the computer pocket dosimeter total is known not to be reliable. This procedure does not adequately implement 10 CFR 20 requirements.
- b. During March 1984, the doses determined by investigations for two individuals who lost their pocket dosimeter (PD) and/or TLD were not added to the individual's dose cards or computer exposure records as required by procedure HP/O/B/1000/03.
- c. Licensee records for TLD/PD correlations for 1983 indicated that all personnel who enter the radiation control zone do not turn in dose cards as required by Health Physics Manual Section 2.2.

This is a Severity Level IV Violation (Supplement IV).
(Applicable to Units 1 and 2)

4. Technical Specification 6.12.2 requires that high radiation areas greater than 1000 mr/hr which are within large areas such as PWR containment, where no enclosure exists for purposes of locking shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device.

Contrary to the above, during February-March 1984 the requirement to mark high radiation areas greater than 1000 mr/hr with a flashing light when the area is not readily locked was not met in that during work on steam generators B, C, and D for Unit 1 the manways were not marked with a flashing light. The radiation dose rate at the steam generator manways and inside the steam generator were greater than 1000 mr/hr.

This is a Severity Level IV Violation (Supplement IV).
(Applicable to Units 1 and 2)

Pursuant to 10 CFR 2.201, you are required to submit to this office within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved.

Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

Date: JUL 03 1984