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

HAL B. TUCKER

January 11, 1985 A5 JAN 22 P 2: 03

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 Nos. 50-269/84-20 50-270/84-19 50-287/84-21

Dear Sir:

By letter dated December 12, 1984, NRC/Region II requested a Supplemental response relative to the Duke response of October 25, 1984 to the Notice of Violation identified in the subject inspection report issued on September 27, 1984.

Although a technical violation may have occurred, Duke contends that the insignificance of the examples stated in the Notice of Violation did not warrant a violation. An inspector followup item or other open item would have been appropriate and sufficient to initiate corrective actions.

In response to your December 12, 1984 letter, the attached response is provided. The corrective actions needed to eliminate the cited item of non-compliance with 10 CFR 20.203(f) will be taken as noted in the response.

Very truly yours,

Hal B. Tucker

PFG:slb

Attachment

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

VIOLATION 2 10 CFR 20.203(f) requires that each container of licensed material shall bear a durable, clearly visible label identifying the radioactive contents. The label shall also provide sufficient information to permit individuals handling or using the containers, or working in the vicinity thereof, to take precautions to avoid or minimize exposures. As appropriate, the information will include radiation levels, kinds of material, estimate of activity, etc. Contrary to the above, containers of licensed material were not properly labeled in that: a. A metal box in the Unit 3 auxiliary building, level 3, was labeled as being less than two millirem per hour when it in fact had contact radiation levels to 48 millirem per hour on the bottom and 17 millirem per hour on the side of the box. b. A wooden box in the Unit 3 auxiliary building, level 3, containing a radioactive control rod drive mechanism, which had contact radiation levels to 80 millirem per hour on the outside of the box, was not labeled. This is a Severity Level IV violations (Supplement IV). ADDITIONAL RESPONSE 1) Corrective actions taken and results: The cited boxes were surveyed and labeled appropriately. This violation has been reviewed in station staff meetings. 2) Corrective actions to be taken to avoid further violations: (a) The cited examples of inadequate labeling and the importance of compliance with 10 CFR 20.203 requirements will be emphasized in the annual requalification training for radiation workers. This will include adherence to Standing Radiation Work Permits on relocation of radioactive material. (b) The Health Physics Section Manual will be revised to adequately address labeling of containers per 10 CFR 20.203. Date when full compliance will be achieved: (a) The revised training program noted in (2a) above will be effective February 4, 1985 and will continue for one year so that all radiation workers are properly instructed. (b) The changes to the Health Physics Section Manual noted in (2b) above will be incorporated by February 15, 1985.