

DUKE POWER COMPANY

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HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

TELEPHONE
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34 OCT 31 08:42
October 25, 1984

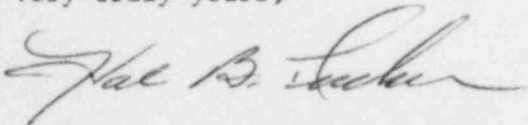
Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Subject: Oconee Nuclear Station
IE Inspection Report
50-269/84-20
50-270/84-19
50-287/84-21

Dear Sir:

In response to your letter dated September 27, 1984 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 October 25, 1984.

Very truly yours,



Hal B. Tucker

SGG:slb

Attachment

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

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VIOLATION '1

10CFR 71.5 requires that each licensee who transports licensed material outside of the confines of its plant or other place of use, or who delivers licensed material to a carrier for transport, shall comply with the applicable requirements of the regulations appropriate to the mode of transport of DOT in 49 CFR Parts 170 through 189.

49 CFR 171.2 requires that no person may offer a hazardous material for transportation within the United States unless that material is properly classed.

49 CFR 172.101 defines radioactive material as a hazardous material.

Contrary to the above, the low specific activity (LSA) classification of a radioactive material shipment on August 23, 1984, of two boxes containing control rod drive mechanisms, under control number ONS-84-120, was not properly determined prior to the shipment.

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

RESPONSE

1) Admission or denial of the alleged violation:

This violation is correct as stated.

2) Reasons for the violation:

This violation resulted from personnel error, and procedural deficiency. The person responsible for classification of the cited shipment did not perform an alpha contamination evaluation as required by Standing Radiation Work Permit. In addition, the present station radioactive material shipping procedure does not offer sufficient guidance on radionuclide identification for non-waste shipments.

3) Corrective actions taken and results:

All non-waste shipments are now being evaluated by appropriate personnel for special nuclide identification, with special emphasis on sampling and component location within plant systems. The person involved in this incident has been counseled.

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

New procedures will be prepared containing proper guidance and effective evaluation methods for identification of radionuclides. Appropriate personnel will receive training in implementation of these procedures as well as in adherence to SRWP requirements.

5) Date when full compliance will be achieved:

All actions described in (4) above will be completed by February 1, 1985.

VIOLATION 2

10CFR 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 violation (Supplement IV).

RESPONSE

- 1) Admission or denial of the alleged violation:

This violation is denied for the reasons noted below:

Duke Power Company considers that the intent of 10 CFR 20.203 is to provide caution signs, labels, signals and controls appropriate in aiding individuals to minimize exposure to radiation or to radioactive material. 10 CFR 20.201 requires surveys to be performed which may be necessary for the licensee to comply with the regulations in this part, and are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present.

The metal box in Example (a) was labeled with a dose rate which was accurate at the time of the associated survey. Although the arrangement of the box contents was subsequently changed, which also changed the dose rate, the increase in dose rate was not significant (assuming that there is negligible exposure from the bottom of a box ~ 7.75 inches above the floor). The next scheduled survey of the area would have provided the information necessary to revise the labeling. The survey frequency in the area is considered adequate and reasonable under the circumstances. Since the box was in a room which is part of a Radiation Control Area, and the labeled dose rate was not significantly less than the actual dose rate, there was adequate information and access control to aid individuals in minimizing their exposure.

The wooden box in Example (b) was stacked on top of a similar labeled box inside a roped-off Radiation Control Zone which was within a Radiation Control Area. The labeled box, as noted in the report details, had radiation levels up to 600 millirem/hour at contact, while the unlabeled box read up to 80 millirems/hour. Although both boxes were initially surveyed and labeled, the label for the cited box apparently became detached during the subsequent period of movement and storage. Based on the labeling of the "hotter" box and the location within a plainly delineated RCZ, there again was sufficient information and access control to aid individuals in minimizing their exposure.

In summary, Duke Power Company considers that the present program of radiation surveys and labeling is sufficient to meet the intent of 10 CFR 20.201 and 10 CFR 20.203, especially when the areas in question are within the station Radiation Control Area. Access to this area is given only to trained individuals who know the potential for exposure in a radiation area, and are given sufficient information to keep their exposure as low as reasonably achievable.

2) Reasons for the violation:

This section is not applicable; see (1) above.

3) Corrective actions taken and results:

The boxes cited were labeled to reflect the radiation levels found by the inspector.

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

This section is not applicable; see (1) above.

5) Date when full compliance will be achieved:

This section is not applicable; see (1) above.