

DUKE POWER COMPANY

P.O. BOX 33189

CHARLOTTE, N.C. 28242

HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

TELEPHONE
(704) 373-4531

85 OCT 1 AIO: 18
September 27, 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
50-269/85-20
50-270/85-20
50-287/85-20

Dear Sir:

In response to your letter dated August 28, 1985 which transmitted the subject Inspection Report, the attached response to the cited items of non-compliance is provided.

Very truly yours,

H. B. Tucker / HB

Hal B. Tucker

SGG:slb

Attachment

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

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Violation 1

Technical Specifications (TS) 3.5.5-1 and 3.5.5-2 require the Licensee to maintain a minimum number of liquid and gaseous effluent monitors in an operable condition or to take compensatory samples. The TS also require best efforts to be made to return the instruments to operable status within 30 days and, if unsuccessful, to explain in the next Semiannual Radioactive Effluent Report why the inoperability was not corrected in a timely manner.

Contrary to these requirements, the monitors, listed below were out of service for the periods shown but were not addressed in the Semiannual Radioactive Effluent Report for the period of July 1 - December 31, 1984. Compensatory sampling was performed as required.

(a) Low Pressure Service Water (LPSW) monitors

- i. 1RIA-35 inoperable beginning 11/9/84 through 7/1/85.
- ii. 3RIA-35 inoperable beginning 11/25/84 through 7/1/85.

(b) Gaseous Waste Decay Tank monitors

A minimum of one of either RIA-37 or RIA-38 is required operable during gas releases. RIA-37 is always inoperable during a release because the instrument always goes offscale and is overridden. Therefore when RIA-38 is inoperable the minimum is not met and compensatory actions are required. 1RIA-38 has been inoperable since 10/12/84.

This is a Severity Level V violation (Supplement 1).

Response

1) Admission or denial of the alleged violation:

This violation is correct as stated. It has been reported to NRC as Licensee Event Report 269/85-09 dated August 12, 1985.

2) Reasons for the violation:

This violation was the result of a Management/Quality Assurance Deficiency, since there was no definitive program to ensure that full compensatory actions (including reporting) pursuant to Technical Specification 3.5.5 were completed in the event that any applicable RIA's became inoperable.

3) Corrective steps which have been taken and the results achieved:

An investigation has been performed to determine the causes for extended inoperability of the RIA's cited as examples. RIA-35 for all units will require modifications to operate properly. 1RIA-38 will be considered fully operable when enough gas releases are made to properly correlate the monitor.

Temporary administrative measures have been established to identify problems with RIA's, expedite repairs, and meet reporting requirements. A more detailed program is being developed to assure proper station responsibility assignments for surveillance, maintenance, and reporting associated with effluent monitoring instrumentation.

4) Corrective steps which will be taken to avoid further violations:

Implementation of the detailed, permanent administrative program to assure proper station responsibility assignments, should preclude further violations.

5) Date when full compliance will be achieved:

The program noted in (3) and (4) above will be implemented by January 1, 1986.

Violation 2

10 CFR 50.71 (4) requires that revisions to the FSAR shall be filed no less frequently than annually and shall reflect all changes up to a maximum of six months prior to the date of filing.

Contrary to the above requirement, changes to the Oconee FSAR for the period ending December 31, 1984 were not filed by July 1, 1985, nor was a request for extension filed or an extension granted as of July 1, 1985.

This is a Severity Level V violation (Supplement 1).

Response

- (1) Admission or denial of the alleged violation:

This violation is admitted.

- (2) Reasons for the Violation:

This violation resulted from Personnel Error. The personnel involved in the preparation, review and submittal of the revisions to the FSAR failed to recognize that an exemption request was required in order to obtain an extension in submitting the required revisions to the FSAR.

- (3) Corrective actions taken and results:

By a letter dated July 1, 1985, Duke advised the NRC of the delay in the submittal of the revisions to the Oconee Nuclear Station FSAR. By a Duke Power letter dated August 15, 1985, the revisions to the Oconee Nuclear Station FSAR were submitted. This incident is considered to be an isolated case and of minor significance.

The personnel involved in this incident have been counseled concerning the regulatory requirements for the preparation and submittal of future FSAR revisions.

- (4) Corrective action taken to avoid further violations:

No additional corrective actions are necessary.

- (5) Date when full compliance will be achieved:

Not applicable.

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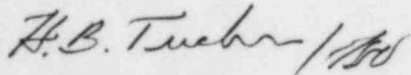
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This is a Severity Level V violation (Supplement 1).

Response

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2) Reasons for the violation:

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3) Corrective steps which have been taken and the results achieved

An investigation has been performed to determine the cause of the inoperability of the RIA's cited as examples. RIA-35 for all units will require modifications to operate properly. 1RIA-38 will be considered fully operable when enough gas releases are made to properly correlate the monitor.

Temporary administrative measures have been established to identify problems with RIA's, expedite repairs, and meet reporting requirements. A more detailed program is being developed to assure proper station responsibility assignments for surveillance, maintenance, and reporting associated with effluent monitoring instrumentation.

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5) Date when full compliance will be achieved:

The program noted in (3) and (4) above will be implemented by January 1, 1986.

Violation 2

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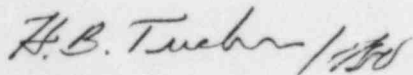
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