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SUBJECT: Submits revised response to RAI re applicaition for renewed operating licenses for Oconee Nuclear Station,Units 1,2 & 3. Util confirms that response to RAI 2.6.1-1 is correct as written & regardless of terminology used.

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March 18, 1999

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Washington, DC 20555

Subject: License Renewal
Response to Requests for Additional Information
Oconee Nuclear Station
Docket Nos. 50-269, -270, -287

By letter dated July 6, 1998, Duke Energy Corporation submitted an Application for Renewed Operating Licenses for Oconee Nuclear Station, Units 1, 2, and 3 (Application). Exhibit A of the Application contains the technical information required by 10 CFR Part 54. The NRC staff is reviewing the information provided by Duke Energy in the Application and by several letters identified areas where additional information is needed to complete its review.

By letter dated February 17, 1999, Duke Energy provided responses to several requests for additional information (RAIs) including RAIs 2.2-6, 2.6-1, 2.6.1-1, and 2.6.7-1. On March 11, 1999, a meeting was held with staff in which Duke Energy provided additional information on several additional topics identified by the staff concerning the scoping methodology utilized in the integrated plant assessment of Oconee Nuclear Station. During this meeting, Duke Energy committed to provide:

(1) a revised response to RAI 2.2-6 to provide additional clarification per our discussions during the March 11, 1999 meeting,
(2) a partially revised response to RAI 2.6-1 to clarify the electrical scoping description and to indicate how the validation of the electrical results was performed (in addition, a conforming change to RAI 2.6.1-3 is provided that directs the reader to the response to RAI 2.6-1), and
(3) a revised response to RAI 2.6.7-1 to indicate how the validation of structural results was performed.

Attachment 1 provides the revised responses to these RAIs, which supercede the responses previously provided.

In addition to the above, Duke Energy confirms that the response to RAI 2.6.1-1 is correct as written and that regardless of the terminology used to identify functions, there is no impact on the results.

1/1

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In addition to the above, Duke Energy confirms that the response to RAI 2.6.1-1 is correct as written and that regardless of the terminology used to identify functions, there is no impact on the results.

If there are any questions, please contact Bob Gill at 704-382-3339.

Very truly yours,

M. S. Tuckman

M. S. Tuckman

M. S. Tuckman, being duly sworn, states that he is Executive Vice President, Nuclear Generation Department, Duke Energy Corporation, that he is authorized on the part of said Company to sign and file with the U. S. Nuclear Regulatory Commission these responses to NRC requests for additional information concerning the Application to Renew the Facility Operating Licenses of Oconee Nuclear Station submitted by letter dated July 6, 1998; and that all statements and matters set forth herein are true and correct to the best of his knowledge and belief. To the extent that these statements are not based on his personal knowledge, they are based on information provided by Duke employees and/or consultants. Such information has been reviewed in accordance with Duke Energy Corporation practice and is believed to be reliable.

M. S. Tuckman

M. S. Tuckman, Executive Vice president
Duke Energy Corporation

Subscribed and sworn to before me this 18th day of March 1999.

Linda Case Smith
Notary Public

My Commission Expires:

May 6, 2000

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Attachment 1

Oconee Nuclear Station
Application for Renewed Operating Licenses
Revised Responses to NRC Requests for Additional Information

March 18, 1999

RAI 2.2-6 (12/1/98B)

In OLRP-1001, Section 2.2, "Identification of Systems, Structures, and Components Within the Scope of License Renewal," the applicant identifies the methodology used to identify structures and *mechanical* systems at Oconee that are within the scope of license renewal. The methodology used to identify electrical components within the scope of license renewal and subject to aging management review is described in Section 2.6 of OLRP-1001.

In Subsection 2.2.1.1, "Mechanical Systems," the applicant states "Because Oconee was licensed before terms such as 'safety-related' were more precisely defined by the NRC, a list of the Oconee safety-related systems, structures, and components, *in and of itself*, will not meet the intent of 10 CFR 54.4(a)(1). Because the criteria in 10 CFR 54.4(a)(1) are the scoping criteria of many modern-day, regulatory-required programs, Oconee conducted a design study that validated all functions required for the successful mitigation of Oconee design basis events and identified the systems and components relied upon to complete those functions. The individual design basis event mitigation calculations produced as a result of the study contain a list of the system functions required to successfully mitigate each event. Duke determined that the systems that perform these functions are within the scope of license renewal."

During a site visit to review the Oconee license renewal scoping and screening process, which was conducted by the NRC staff on October 27 through 30, 1998, at Duke Power Corporate offices in Charlotte, North Carolina, the staff learned that the "*design study*" identified in Subsection 2.2.1.1 and the Oconee Safety-Related Designation Clarification (OSRDC) project were one and the same.

Specifically, in its November 4, 1983, response to Generic Letter (GL) 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events" (July 1983), as supplemented by letters dated January 17, 1984, and June 9, 1987, Duke described the scope of the Oconee operational quality assurance (QA) program for safety-related equipment classification. The NRC staff approved the scope of the Oconee operational QA program via a safety evaluation dated November 4, 1987.

In a supplemental response to GL 83-28, dated April 12, 1995, Duke provided amplifying information on Oconee's QA-1 licensing basis, and on information provided to the NRC Region II staff during a February 6, 1995, meeting. In Attachment 3 to this letter, "Supplemental Response to Subpart 1 of Section 2.2.1 of GL 83-28 General Criteria for Classifying QA-1 SSCs [structures, systems, and components]," Duke stated that the list of additional QA-1 SSCs would be developed through the OSRDC project by July 10, 1995. Also, in Attachment 4, "Oconee Licensing Position on Non QA-1 SSCs which are used to Mitigate Accidents," Duke committed to developing a new QA classification (QA-5) such that these SSCs can be identified "for testing and maintenance under

selected Appendix B [to 10 CFR Part 50] criteria without procuring the SSCs per Appendix B." [OLRP-1001, Section 2.2]

Based on the above, the staff is requesting that Duke provide the following information:

a. Please clarify the extent to which the Oconee license renewal process described in OLRP-1001 relied upon the OSRDC results.

b. Please describe the specific process (and its current status) used by Duke to confirm that the OSRDC project has identified all Oconee structures, systems, and components (including electrical) that perform the functions identified in 10 CFR 54.4(a).

c. Please identify and describe the administrative controls (and associated commitments) currently in place at Oconee to ensure that QA-5 structures, systems and components (identified through the OSRDC project), and subject to aging management review, will be adequately managed during the life of the renewed license. If such controls are not in place, please provide justification.

Revised Response to RAI 2.2-6
As background to the staff's specific requests for information on this topic, additional information is provided regarding the design study referenced in Exhibit A of the Application. The design study refers to one initiative of the Oconee Safety-Related Clarification (OSRDC) project. The following three paragraphs provide an overview of the entire OSRDC project. Please note that only the results of the second initiative provided input into license renewal scoping.

The first initiative of the OSRDC project was to clarify Oconee's QA-1 licensing basis by developing a list of all QA-1 systems, structures, and components at Oconee. This activity was a committed NRC activity in response to GL 83-28. The list was submitted to NRC in letters dated July 10, 1995, and May 6, 1996. Submittal of these letters constitutes the completion of this NRC commitment by Duke Energy. No other portions or activities of the OSRDC project were committed to the NRC at that time or any time hence.

The second initiative of the OSRDC project was to clarify Oconee's licensing basis with respect to design basis event mitigation requirements. The methodology for performing this task was to identify all system functions required to mitigate each design basis event within Oconee's licensing basis. These system functions were mapped onto Oconee flow diagrams. From these mapped system functions required for design basis event mitigation, a list of active components was compiled. The analyses for identifying the system functions and components required to mitigate each design basis event were performed and documented in retrievable Oconee calculations in accordance with Duke Power Engineering Directives. This initiative of the OSRDC project is an internal Duke

activity that does not represent a prior commitment to the NRC. This activity has been completed.

The third initiative involves categorizing the active components identified in the second initiative into QA-1 and non-QA components. The fourth initiative is to implement an augmented QA program for those non-QA systems and components identified in the third initiative. This program is named "QA-5". These initiatives are targeted for completion in 2000. Because the third and fourth initiatives of the OSRDC project focus on active components, they did not provide input into any aspect of the license renewal scoping process.

The following paragraphs specifically address the individual questions of the RAI. For convenience, the RAIs are repeated prior to each response.

a. Please clarify the extent to which the Oconee license renewal process described in OLRP-1001 relied upon the OSRDC results.

Response to Part (a) – Mechanical Scoping Process

Because Oconee was licensed before terms such as "safety-related" were more precisely defined by the NRC, a list of the Oconee safety-related systems, structures, and components, in and of itself, will not meet the intent of §54.4(a)(1). The criteria in §54.4(a)(1) was first used by the NRC in §50.49. These criteria have been used as the scoping definition for many modern-day, regulatory-required programs since then. For this reason, Oconee conducted the second initiative of the OSRDC project so that the results of the project could be used as input into scoping future regulatory-required programs. The initiative validated all functions required for the successful mitigation of Oconee design basis events and identified the systems and components relied upon to complete those functions. The first task of the process was to identify the list of events that constitute design basis events for Oconee. Design basis events within Oconee's licensing basis are defined in Chapter 15 of the Oconee Updated Final Safety Analysis Report. Then, for each design basis event, system functions needed for mitigation were identified methodically, using a standard list of critical safety functions[1] to ensure completeness. Satisfying these critical safety functions assures that the event mitigation criteria, as described in 10 CFR 54.4(a)(1)(i), (ii), and (iii) will be met. All main process system functions and all supporting system functions that are necessary for the main process systems to perform were identified.

As an additional conservatism, because Duke realized that Oconee's definition of design basis event may be more narrow than the standard industry definition of more modern plants, a list of additional "scoping events" was generated for Oconee. In practice, these scoping events should be considered for inclusion when identifying the scope of SSCs subject to the regulations that refer to the NRC definition of "design basis event," first defined in §50.49. Automatic inclusion is not considered a regulatory requirement, but inclusion of these scoping events is based on a risk-informed decision-making process.

These scoping events include the emergency feedwater system design scenarios (e.g. loss of main feedwater), the SSF turbine building flood scenario, and natural phenomena (e.g. tornado, seismic, external floods and groundwater, and snow and ice criteria). License renewal scoping includes the systems and components that satisfy the licensing basis criteria of these additional events.

The mapped Oconee flow diagrams generated from the second initiative of the OSRDC project were used as the starting point for license renewal scoping. These mapped system functions comprise the first step of mechanical license renewal scoping as described in Section 2.2.1.1(a) of Exhibit A of the Application. From that point, three more steps were performed that added more systems and components to the scope of license renewal. These three steps are described in Sections 2.2.1.1(b), (c), and (d) of Exhibit A of the Application. As mentioned above, Oconee's design and licensing basis does not lend itself to the capability of following the rote, sequential steps of §§54.4(a)(1) and (2) as a scoping methodology. In other words, it was not feasible to perform one step to identify those components required to meet §54.4(a)(1), then perform a second step to identify those components required to meet §54.4(a)(2). For this reason, the criteria of §§54.4(a)(1) and (2) were combined, and the four scoping steps described in Section 2.2.1.1(a) through (d) of Exhibit A of the Application were performed to meet the combined criteria of §§54.4(a)(1) and (2). Although the mechanical scoping process does not contain one step for satisfying §54.4(a)(1) and a separate step for satisfying §54.4(a)(2), completion of the four steps described in Sections 2.2.1.1(a) through (d) ensures that the mechanical systems and components required to meet entire criteria of §§54.4(a)(1) and (2) were identified and included within the scope of license renewal.

Response to Part (a) – Structural Scoping Process

The structural scoping process described in Section 2.2 of Exhibit A of the Application did not rely on any OSRDC results. The OSRDC project was not designed to identify structures. Subsequently, the OSRDC project results were used in a license renewal study to validate that all structures, which contain electrical components that satisfy the criteria contained in §§54.4(a)(1) and (a)(2), were identified. The review verified that all structures that contain electrical components that satisfy the criteria contained in §§54.4(a)(1) and (a)(2) of the Rule have been identified. In addition, a review was performed to ensure that the structures that contain mechanical components that satisfy the criteria contained in §§54.4(a)(1) and (a)(2) were identified. The mechanical components and their location were identified in the on-site mechanical screening documentation. The review verified that all structures that contain mechanical components that satisfy the criteria contained in §§54.4(a)(1) and (a)(2) of the Rule have been identified. (See also the revised response to RAI 2.6.7-1)

Response to Part (a) – Electrical Screening and Scoping Process
The electrical screening and scoping process described in Section 2.6 of Exhibit A of the Application did not rely on any OSRDC results. Subsequently, as noted above, a review of the OSRDC results was performed to validate that the four selected groups of electrical components that are scoped out are not required to meet the criteria in §§54.4(a)(1) or (a)(2). (See also the revised response to RAI 2.6-1)

b. Please describe the specific process (and its current status) used by Duke to confirm that the OSRDC project has identified all Oconee structures, systems, and components (including electrical) that perform the functions identified in 10 CFR 54.4(a).

Response to Part (b) – Mechanical Scoping Process
The response to part (a) of this RAI, above, and Section 2.2.1.1 of Exhibit A of the Application provide a description of the process employed to confirm that all mechanical systems and components that perform functions identified in §§54.4(a)(1) and (2) are included within the scope of license renewal. From this description, it is seen that the OSRDC project did not identify all Oconee structures, systems, and components that perform the functions identified in §54.4(a). The OSRDC project was not designed to identify any structures. The OSRDC project results were used as the starting point for mechanical system §54.4(a)(1) and (a)(2) scoping, then several other scoping steps were performed in order to identify all mechanical systems and components that perform the functions identified in §§54.4(a)(1) and (2). Scoping of mechanical systems for §54.4(a)(3) did not rely on OSRDC project results at all. The process used to identify the mechanical systems and components that meet the criteria of §54.4(a)(3) is described in Section 2.2.2 of Exhibit A of the Application. The mechanical system scoping process for license renewal is complete.

Response to Part (b) – Structural Scoping Process
Structural scoping was performed differently than mechanical scoping. As stated above in the response to Part (a), the structural scoping process did not rely on OSRDC results. The OSRDC results were subsequently used to validate that that all structures, which contain electrical components that satisfy the criteria contained in §§54.4(a)(1) and (a)(2), were identified. OSRDC results were not used in any way for §54.4(a)(3) scoping. Sections 2.2.1.2 and 2.2.2 of Exhibit A of the Application provides a discussion of the methodology for scoping structures. See also the revised response to RAI 2.6.7-1. The implementation of the methodology described ensures that the structural scoping process for license renewal is complete.

Response to Part (b) – Electrical Screening and Scoping Process
Electrical scoping was performed differently than mechanical scoping. As stated above in the response to Part (a), the electrical scoping process did not rely on OSRDC results. The OSRDC results were subsequently used to validate that the four selected groups of

electrical components that are scoped out are not required to meet the criteria in §§54.4(a)(1) or (a)(2). OSRDC results were not used in any way for §54.4(a)(3) scoping. The revised response to RAI 2.6-1 provides a discussion of the methodology for scoping electrical components. The implementation of the methodology described ensures that the structural scoping process for license renewal is complete.

Finally, calculations performed for the OSRDC project and used as input for license renewal scoping are QA-1 calculations. These calculations are performed in accordance with the Duke Energy Corporation Quality Assurance Program with guidance provided by Duke Power Engineering Directives. The Quality Assurance Program assures that Duke Energy Corporation's nuclear power plants are designed, constructed, tested, and operated in conformance with good engineering practices and to the criteria established in Appendix B of 10CFR 50, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants", and to approved industry standards, such as ANSI N45.2-1971 and ANSI N18.7-1976. The Duke Energy Corporation Quality Assurance Program provides for the independent assurance of activities associated with items and tasks critical to the safety and integrity of the station. When such a task is being performed, Duke Power Engineering Directives provide guidance for these activities, such as requiring independent verification and approval for the completion of a QA-1 calculation. By complying with these established governing standards, Duke has confidence that the process for performing QA-1 analyses assures accuracy and completeness of the OSRDC results.

c. Please identify and describe the administrative controls (and associated commitments) currently in place at Oconee to ensure that QA-5 structures, systems and components (identified through the OSRDC project), and subject to aging management review, will be adequately managed during the life of the renewed license. If such controls are not in place, please provide justification.

Response to Part (c)

The third and fourth initiatives of the OSRDC project, the identification and implementation of an augmented QA program ("QA-5") for important non-safety related systems and components, were not used for any part of Oconee license renewal scoping. These components and the quality controls associated with QA-5 will be independent of license renewal.

Footnote:

[1] A standard list of critical safety functions is adapted from *The Critical Safety Functions and Plant Operation*, by W R Corcoran, N J Porter, J F Church, & M T Cross (Combustion Engineering, Inc) and by W M Guinn (INPO), presented Oct 20-24, 1980, in Stockholm at the IAEA International Conference on Current Nuclear Power Plant Safety Issues

Response to RAI 2.6-1 (Partially Revised)
Replace the existing response to RAI 2.6-1 starting at "Column 3 of RAI Response Table 2.6-1," on Page 9 of Attachment 3 of Duke letter dated February 17, 1999 with the following:

Column 3 of RAI Response Table 2.6-1 — Application of §54.4(a) Criteria
Column 3 provides the results of the application of the criteria of §54.4(a) to the electrical components that meet the criteria of §54.21(a)(1)(i).

Information provided in this section is intended to also address aspects of RAI 2.6-2, RAI 2.6.1-1, RAI 2.6.1-2, RAI 2.6.1-3, RAI 2.6.7-1, and RAI 2.6.7-2.

For scoping purposes, all plant electrical components are grouped into one of three categories: QA Condition 1 components are scoped in, some components are scoped out using §54.4(a) criteria, and the remaining plant electrical components are included in the scope of review as part of an encompassing group. An encompassing group of components is a defined group that includes both electrical components that meet the §54.4(a) criteria and electrical components that may or may not meet the §54.4(a) criteria. The three electrical component scoping categories are:

Category 1 - Electrical components that are designated as QA Condition 1 and are scoped in - These components meet the criteria of §54.4(a) and are included in the scope of the aging management review.

Category 2 - Selected groups of electrical components that are demonstrated *not* to meet the criteria of §54.4(a) and are scoped out - Electrical components demonstrated not to meet the criteria of §54.4(a) are those associated with the (A) 525 kV Switchyard, (B) Jocassee, Calhoun, Oconee, and Dacus 230 kV transmissions lines, (C) Radwaste Facility, and (D) Oconee Retail substation. As presented later in this section, these electrical components do not meet the criteria of §54.4(a) and are not included in the aging management review.

Category 3 - All remaining electrical components that are not in Category 1 or Category 2 are included in the scope of review - These electrical components may or may not meet the criteria of §54.4(a) but are included in the scope of review as part of an encompassing group.

It can be seen that using this scoping method results in all electrical components at Oconee falling within the scope of license renewal, except the groups of electrical components identified in Category 2. These groups are eliminated from scope because they do not meet the criteria of §54.4(a). The basis for the determination that the groups of electrical components identified in Category 2 above do not meet the criteria of

§54.4(a) is provided below. Many other electrical components that do not meet the criteria of §54.4(a) are included in the scope of review as part of an encompassing group.. Following the scoping of these selected groups of electrical components, there are scoping discussions for the electrical component commodity groups that meet the criteria of §54.21(a)(1)(i).

The Oconee Safety-Related Designation Clarification (OSRDC) project clarified the Oconee QA Condition 1 licensing basis and clarified the Oconee licensing basis with respect to design basis event mitigation requirements. Further details of the OSRDC project are contained in the Response to RAI 2.2-6. The OSRDC project identified all active electrical components required to meet the criteria contained in §§54.4(a)(1) and (a)(2). This list of electrical components was used to validate the structural and electrical scoping results. For details for the structural scoping validation, see the response to RAI 2.6.7-1. For electrical scoping validation, a license renewal study was performed that (1) identified the location of all electrical components in the list, and then (2) verified that none of those locations are associated the 525 kV Switchyard, the Jocassee, Calhoun, Oconee, and Dacus 230 kV transmissions lines, the Radwaste Facility, or the Oconee Retail substation. The results of the study validate that the four selected groups of electrical components that are scoped out are not required to meet the criteria in §§54.4(a)(1) or (a)(2).

Scoping discussions for the selected groups of electrical components are provided below.

Continue with the response to RAI 2.6-1 previously provided on Page 10 of Attachment 3 of Duke letter dated February 17, 1999.

Response to RAI 2.6.1-3 (Revised)

NOTE: *This RAI stems from staff review of a document that is not part of the Application. In addition to reviewing the responses to this RAI, the reviewer is encouraged to read the Response to RAI 2.6-1.*

Subsection 3.2.1 of the Oconee electrical component integrated plant assessment basis document is the section pertaining to the application of §54.21(a)(1)(i) criteria (screening) to electrical components. Subsection 3.2.2 of the basis document is the section pertaining to the application of §54.4(a) criteria (scoping) to electrical components. Statements made regarding §54.4(a) scoping do not pertain to and are not in addition to statements made regarding §54.21(a)(1)(i) screening. These are two separate and distinct steps in the electrical component integrated plant assessment.

a. As noted in this RAI, the §54.21(a)(1)(i) determination should be performed using "component-level" intended functions. The process used to make §54.21(a)(1)(i) determinations for electrical components is provided in the last sentence of the paragraph of Subsection 3.2.1 quoted in the RAI which states that the §54.21(a)(1)(i) determination is made based on the way the component performs its intended function. This determination deals only with the component-level intended function. This is consistent with the guidance in NEI 95-10 Rev. 0 and the requirements of the license renewal rule.

b. Subsection 3.2.1 of the Oconee electrical component integrated plant assessment basis document pertains to the application of §54.21(a)(1)(i) criteria (screening) to electrical components and does not pertain to §54.4(a) scoping. Oconee Safety-Related Designation Clarification (OSRDC) project results are used to validate that the four selected groups of electrical components that are scoped out are not required to meet the criteria in §§54.4(a)(1) or (a)(2). Refer to the discussion in the Response to RAI 2.6-1 under the section titled, **Column 3 of RAI Response Table 2.6-1 — Application of §54.4(a) Criteria** for details on this scoping validation.

Response to RAI 2.6.7-1 (Revised)

NOTE: *This RAI stems from staff review of a document that is not part of the Application. In addition to reviewing the responses to this RAI, the reviewer is encouraged to read the Response to RAI 2.6-1.*

a. The OSRDC results are not used to determine that structures associated with Transformer CT5 and the 100 kV transmission line are Class 3. Oconee UFSAR Section 3.2.1.1 identifies all Class 1 and 2 structures, and no structures associated with Transformer CT5 and the 100 kV transmission line are identified. Therefore, structures associated with Transformer CT5 and the 100 kV transmission line are classified as Class 3. This is the Oconee current licensing basis (CLB). A study was conducted which reviewed the information generated by the Oconee Safety-Related Designation Clarification (OSRDC) project. This study confirmed that Transformer CT5 and the 100 kV Fant Black transmission line are not required during or following any design basis event. Although these systems are required by Oconee Technical Specifications and Emergency Operating Procedures, those items are not within the scoping criteria of §54.4.

b. Electrical components are not identified during the scoping process of Oconee structures. As discussed in the Response to RAI 2.6-1, Duke is opting for a more conservative approach that no longer eliminates electrical components from the aging management review based on their being supported by a specific class of structure.

c. The OSRDC project results were used in a study to validate that all structures, which contain electrical components that satisfy the criteria contained in §§54.4(a)(1) and (a)(2), were identified. The review verified that all structures that contain electrical components that satisfy the criteria contained in §§54.4(a)(1) and (a)(2) of the Rule have been identified. In addition, a review was performed to ensure that the structures that contain mechanical components that satisfy the criteria contained in §§54.4(a)(1) and (a)(2) were identified. The mechanical components and their location are identified in the on-site mechanical screening documentation. The review verified that all structures that contain mechanical components that satisfy the criteria contained in §§54.4(a)(1) and (a)(2) of the Rule have been identified.