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SUBJECT: Notifies NRC of change in method to be used for testing ECCW sys on Unit 3. Change makes test method for Unit 3 ECCW sys same as testing for Units 1 & 2.

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November 25, 1998

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Subject: Oconee Nuclear Site
Docket Nos. 50-269, -270, -287
Notification of Commitment Change for Emergency
Condenser Circulating Water Testing

Duke Energy Corporation (Duke), stated in a letter dated August 28, 1997, that the Low Pressure Service Water (LPSW) pumps would take suction from the siphon during the Emergency Condenser Circulating Water (ECCW) testing on Oconee Unit 3, but not on Units 1 and 2. The purpose of this letter is to notify the Commission of a change in the method to be used for testing the ECCW System on Unit 3.

Since the LPSW pumps are shared for Units 1 and 2, it is not prudent to cause an operating unit to rely on the ECCW siphon during this test. Since Unit 3 LPSW pumps are not shared, it was believed to be acceptable to align the LPSW pumps to the siphon during the test. This approach was approved by the NRC in a letter dated April 24, 1998. Duke also stated that the Siphon Seal Water (SSW) flow to the CCW pumps would be isolated during this test. 1/0

Recently, during preparation for the Unit 3 test, it was determined that the CCW pumps tend to rotate or "windmill" during siphon flow testing when the LPSW pumps are taking suction from the siphon. The manufacturer of the CCW pumps was consulted, and does not recommend allowing the pumps to windmill at the estimated 10-20 rpm without lubrication. As stated earlier, lubrication will not be available since SSW is isolated during the test. To prevent windmilling the CCW pumps, the ECCW test will be performed without aligning the LPSW pumps to the siphon. 9001

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Therefore, Duke has modified the test method under the 10CFR 50.59 regulation to perform this test in a manner that prevents equipment damage. This change makes the test method for the Unit 3 ECCW System the same as the testing for Units 1 and 2.

The original basis for aligning the LPSW pumps to the siphon for the Unit 3 test was to increase the flow rate through the first siphon. This increased flow rate would have no effect on the air in-leakage rate, but it would potentially increase the rate of degassing of dissolved gases from the water. This degassing effect, which is believed to be small compared with air in-leakage, is already addressed by the test acceptance criterion. This criterion is based on an extrapolation of the degassing effect that would occur at the minimum flow rate allowed during the test as compared to the degassing that would occur at the design basis flow rate. Even without the LPSW pumps taking suction from the siphon, the flow rate will be verified to be greater than the flow rate required by the test acceptance criterion. Therefore, the test will adequately meet its stated purpose.

This commitment change was made in accordance with Duke's Nuclear System Directive NSD-214 and under the 10 CFR 50.59 regulation.

If there are any questions regarding this submittal, please contact Edwin Price Jr. at (864) 885-4388.

Very truly yours,



W. R. McCollum, Jr.
Site Vice President
Oconee Nuclear Site

NRC Document Control Desk
November 25, 1998
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cc: L. A. Reyes, Regional Administrator
Region II

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Oconee Nuclear Site

D. E. LaBarge, Project Manager
NRR