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 50-270 Oconee Nuclear Station, Unit 2, Duke Power Co.      05000270  
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SUBJECT: Submits supplemental response to GL 96-06, "Assurance of Equipment Operability & Containment During Design Basis Conditions." Results of util review of piping support loads, discussed.

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W. R. McCollum, Jr.  
Vice President

March 23, 1999

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

Subject: Oconee Nuclear Station  
Docket Nos. 50-269, 50-270, 50-287  
Supplemental Response to Generic Letter 96-06:  
Assurance of Equipment Operability and Containment  
Integrity During Design-Basis Conditions

Generic Letter (GL) 96-06, "Assurance of Equipment Operability and Containment Integrity During Design Basis Conditions", was issued on September 30, 1996. GL 96-06 requested licensees to determine if containment air cooler cooling water systems are susceptible to either waterhammer or two-phase flow conditions during postulated accident conditions and to determine if piping systems that penetrate containment are susceptible to thermal expansion of fluid that could lead to overpressurization of piping. Duke Energy Corporation (Duke) responded to GL 96-06 in submittals to the NRC dated October 29, 1996, January 28, 1997, April 15, 1997, June 30, 1997, August 1, 1997, May 28, 1998, September 22, 1998, and December 17, 1998.

In the August 1, 1997, submittal, Duke included a schedule for implementation of modifications, if necessary, to piping supports in the Low Pressure Service Water (LPSW) System. The implementation dates were predicted based on outage schedules as follows: 1EOC18, 3/99; 2EOC17, 10/99; and 3EOC18, 3/2000 (Action Items 14, 15, & 16 respectively).

In July of 1998, Duke, along with other licensees, joined a collaborative effort with EPRI and NEI to publish a Technical Basis Report (TBR) for waterhammers postulated by GL 96-06. The intent of the TBR is to respond to issues raised by the staff in Requests for Additional Information (RAIs) and provide the licensees an overall framework in which to address waterhammers postulated by the GL. The projected completion date for the TBR is July 15, 1999.

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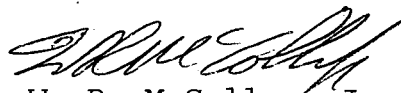
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Duke has completed the review of piping and piping support loads based on force time histories with all Reactor Building Auxiliary Coolers (RBAC) valved in and all RBAC fans on for the three Oconee Units per our commitments outlined in our letter of September 22, 1998. Using conservative analysis techniques, the review confirmed that the LPSW system, while exceeding certain code allowables, remains operable for waterhammers postulated by the GL.

Duke believes it is prudent at this time to delay any modifications to the LPSW piping system until the TBR is published and reviewed. Duke believes the TBR will provide alternative analysis techniques that will more accurately portray waterhammer pressure waves, and piping system structural responses than the conservative analyses previously completed. Duke proposes to submit a long-term resolution plan to the staff five months after the TBR is published to allow for application of the alternative techniques to the LPSW piping system. Based on the projected TBR completion date of 7/15/99, Duke proposes to submit our plan to the staff by 12/15/99. Duke believes this delay is prudent given the complexities of the analysis and is commensurate with the safety benefits gained.

Please address any questions to Ed Burchfield at 864-885-3292.

Very truly yours,

  
W. R. McCollum, Jr.  
Site Vice President

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March 23, 1999  
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