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ACCESSION NBR: 9309080166 DOC. DATE: 93/08/31 NOTARIZED: NO DOCKET #
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 50-270 Oconee Nuclear Station, Unit 2, Duke Power Co. 05000270
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SUBJECT: Provides info re upcoming replacement of 1C LPSW pump motor in units 1 & 2 LPSW sys.

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DUKE POWER

August 31, 1993

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269,-270
"1C" LPSW Pump Motor Replacement

The following information is provided to describe the upcoming replacement of the "1C" Low Pressure Service Water (LPSW) pump motor in the shared Unit 1 and 2 LPSW system. The "1C" pump motor is currently operating with stator temperatures higher than the nameplate specification, but below the alarm and shutdown temperatures. Replacement of this motor is currently scheduled for September 13, 1993. Note that the "1B" and "3A" pump motors were replaced in May of 1993 and June of 1993 respectively. Experience from these motor replacements indicates that the replacement can be performed within 24 hours, however, unforeseen circumstances such as difficulty in performing the alignment could extend this schedule. The acceptability of continued operation of Units 1 and 2 for up to a total of 72 hours with one LPSW pump inoperable is addressed below.

Technical Specification 3.3.7 "Low Pressure Service Water (LPSW)" currently allows Unit 1 or 2 to have an RCS temperature $\geq 250^{\circ}\text{F}$ or RCS pressure ≥ 350 psig with only two LPSW pumps operable. TS 3.3.7.a(2) permits 24 hours for one of the two required LPSW pumps to be inoperable (e.g., two of the three pumps inoperable) for 24 hours. LER 269/92-12 and NRC unresolved item (URI) 269, 270, 287/92-24-05 describe the discovery of the need to maintain all three LPSW pumps operable in the shared Unit 1 and 2 LPSW system in order to meet the single failure criterion. On September 4, 1992 as a result of this discovery an interpretation of TS 3.3.7 was approved which required all three LPSW pumps for the shared Unit 1 and 2 LPSW system to be operable. Thus, the interpretation established an administrative control to ensure that the LPSW system met the single failure criterion. The interpretation specifies that the provisions of TS 3.3.7.a(2) would apply in the event one of the three LPSW pumps is inoperable. The interpretation permitted 24 hours for one of the three LPSW pumps to be inoperable, and required that TS 3.0 be entered in the event two of the three LPSW pumps are inoperable.

An amendment to the technical specifications was proposed on May 3, 1993 to correct the inadequacies of the currently approved LPSW technical specifications and to permit one of the three LPSW pumps to be inoperable for 72 hours, however at this time there are no requirements within the Oconee licensing basis limiting the allowable outage time for the third LPSW pump. Specifically, the Oconee facility operating license, FSAR and regulations do not currently provide restrictions on length of time the third LPSW pump may be inoperable. The restriction on the allowable outage time is provided via an administrative control (e.g., the Technical Specification Interpretation). The FSAR and original SER recognize that three LPSW pumps are required in order to meet the single failure criterion, however these documents do not establish a limit on the length of time the third pump may be inoperable.

A 72 hour time period for the third LPSW pump to be inoperable is reasonable based on the capabilities afforded by the operable LPSW pumps and the low probability of a design basis accident occurring during this period. This time period is consistent with the provisions of NUREG 1430, Standard Technical

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August 31, 1993
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Specifications for B&W Plants. Further, replacement of the "1C" LPSW pump motor will result in increased LPSW system reliability.

Very Truly Yours,

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