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AUTH. NAME AUTHOR AFFILIATION
HAMPTON, J.W. Duke Power Co.
RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Provides proposed action plan, outlining activities that will be performed in conjunction w/mod, as discussed during 950202 telcon.

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Duke Power Company
Oconee Nuclear Site
P.O. Box 1439
Seneca, SC 29679

J. W. HAMPTON
Vice President
(803)885-3499 Office
(803)885-3564 Fax



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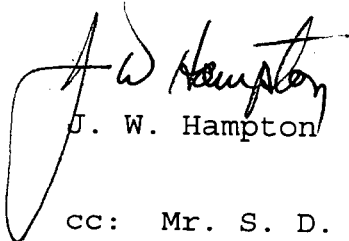
March 15, 1995

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Response to NRC questions on the proposed Emergency
Power Modification

During a conference call on February 2, 1995, Duke and the NRC discussed the planned testing, periodic surveillances, and technical specification changes for the proposed Oconee Emergency Power modification which is currently under review by the NRC. This letter provides the proposed action plan which outlines the activities that will be performed in conjunction with the modification.

Very truly yours,


J. W. Hampton

cc: Mr. S. D. Ebnetter, Regional Administrator
U. S. Nuclear Regulatory Commission, Region II

Mr. L. A. Wiens, Project Manager
Office of Nuclear Reactor Regulation

Mr. P. E. Harmon
Senior Resident Inspector
Oconee Nuclear Site

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OCONEE NUCLEAR STATION
NSM ON-52966
ACTION PLAN

Pre-modification Testing

Eleven load rejection tests were performed at Keowee Hydro on Thursday February 23, 1995. The tests included both single and dual unit load rejections of loads ranging from 60 to 90 MW. These tests measured and recorded data pertinent to the speed response of the Keowee units. The parameters recorded were operating unit power level, lake level conditions, unit wicket gate position, unit rpm, governor oil pressure and level.

The test data will be used as input for calculation KC-UNIT1-2-0106. This analysis will document the response of the Keowee units following a load rejection under varying initial conditions. Operating curves restricting the operation of Keowee will be developed from this analysis. The effects of measurement uncertainty on the operating curves will be addressed in the analysis.

This calculation file will be submitted to the NRC by April 14, 1995.

Post Modification Testing

As with all modifications at Oconee and Keowee, a post modification test (PMT) will be performed. The post modification test will include an installation test (i.e. wired correctly, continuity check) as well as a functional test. The functional test verifies that the modified system functions as designed. Breakers, relays, indicating lights, and alarms are all verified to ensure they perform their design function. The functional PMT will include a maximum load rejection based on operating conditions on that day. A dual unit load rejection will be performed unless two single unit load rejections are justified. Instrumentation installed by this modification or used by this modification, such as the frequency relays, magnetic pickup speed switches and Watt/Var meter, will be checked to ensure they are properly calibrated.

The functional test for Part "A" (zone overlap portion) of this modification is described in Duke's response to an earlier request for additional information from the NRC. This response was submitted on April 19, 1994.

Following successful completion of the post modification tests, both Keowee units can periodically generate to the system grid in accordance with administrative restrictions.

**OCONEE NUCLEAR STATION
NSM ON-52966
ACTION PLAN**

Periodic Surveillance

Periodic testing and instrument surveillance will be performed for the equipment associated with NSM ON-52966. Where applicable, existing surveillance test procedures will be revised to include steps for testing portions of the new logic added by this NSM. For example, the SK breaker close permissive logic test will be added to an Oconee unit's EPSL functional test which is performed on a refueling cycle frequency. For new logic that can be tested more effectively with a new procedure rather than revising an existing one, new test procedures will be developed. The magnetic pickup speed switch logic and latching relay logic are possible examples for this case. Load rejection tests will be performed periodically to ensure the Keowee unit's response to a load rejection has not changed beyond the expected uncertainty. These tests will also allow us to expand the range of initial conditions (i.e. lake levels) used to benchmark the calculation model which determines the operating restrictions. The results of these test will be reviewed against existing operating restrictions. Based on a comparison of the load rejection test results and the calculation model, the operating restrictions could be revised, as appropriate. Instrument/meter and relay calibrations will be periodically performed. These calibrations will be controlled under the Keowee PM program.

Periodic surveillance for Part "A" (i.e. zone overlap portion) of this modification will be preformed as described in the proposed Technical Specification change submitted by letter dated February 24, 1994.

Technical Specification Amendments

A Technical Specification (TS) change for Part "B" of this modification will be submitted within 90 days following the implementation of this modification. The proposed Technical Specification change will qualitatively address operability restrictions for Keowee commercial generation based on lake conditions and power levels. In addition, periodic surveillances to ensure the Keowee units remain operable for emergency functions during periods of commercial generation will be added to TS. Critical meter calibrations such as the Watt/Var meter will be verified independently as a prerequisite for this surveillance requirement.

A Technical Specification change request for part "A" of this modification was submitted by letter on February 24, 1994.

OCONEE NUCLEAR STATION
NSM ON-52966
ACTION PLAN

Load Restrictions

The Keowee operating load restriction curves resulting from calculation KC-UNIT1-2-0106 will be administratively controlled in the Keowee Modes of Operating Procedure and the Oconee Selected Licensee Commitment (SLC) manual. These administrative controls will be in place prior to placing the modification in service.