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SUBJECT: Forwards Rev 1 to ONS emergency power mod action plan,
 including details discussed in 950329 telcon w/NRC.

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DUKE POWER

April 19, 1995

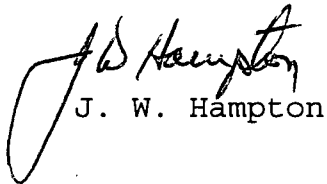
U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

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

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. An action plan for the Oconee Emergency Power modification was submitted to the NRC on March 15, 1995.

Following the NRC review of the action plan, another conference call was held on March 29, 1995 to discuss the details of the action plan. In the conference call, Duke agreed to submit a revised action plan which included the details discussed in the conference call. Please find attached a copy of the revised action plan.

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

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Senior Resident Inspector
Oconee Nuclear Site

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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 May 1, 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.

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

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 Emergency Power Switching Logic 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 performed as described in the proposed Technical Specification change submitted by letter dated February 24, 1994.

Technical Specification Amendments

A Technical Specification change for Part "B" of this modification will be submitted within 90 days following the implementation of this modification. Duke Power commits to impose the proposed Technical Specification restrictions on Oconee prior to placing the modification in service. This will be accomplished by creating an additional Selected Licensee

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Commitment (SLC) that will contain the proposed Technical Specification restrictions and Keowee operating restrictions. Any redundant restrictions will be removed from the SLC following NRC approval of the proposed Technical Specification amendment.

The proposed Technical Specification change will qualitatively address operability restrictions for Keowee commercial generation based on lake conditions and power levels. The proposed Technical Specification change will reference the SLC which contains the Keowee operating restrictions. Commercial operation outside of the acceptable region will be prohibited.

In addition, a periodic surveillance will be added to the Technical Specifications to ensure that the Keowee units remain operable for emergency functions during periods of commercial generation. This surveillance will ensure that the adverse effects of overspeed following a load rejection will be precluded and the appropriate emergency power paths will be aligned. In addition, the speed sensing governor failure logic will be verified during this surveillance. Failure to meet the acceptance criteria will be evaluated in Oconee's corrective action program to determine the impact on operability of the emergency power paths. A refueling frequency will be proposed for this surveillance. The refueling frequency is consistent with a similar surveillance for the Emergency Power Switching Logic.

A periodic surveillance will be added to the Technical Specifications to verify that the Keowee Hydro Units response to the load rejection has not changed. This surveillance will include a maximum load rejection as defined by the operating conditions for the day of the test. The test acceptance criterion for this surveillance will be that the Keowee Hydro units return to 110% speed or less and decreasing within 22 seconds following a load rejection. A dual unit load rejection will be used for this surveillance unless two single unit load rejections are justified during the Technical Specification amendment process. The proposed technical specification will require a load rejection test following a revision to the operating limits. However, if a load rejection test is performed to revise the operating restrictions, then no additional load rejection test will be required until the next surveillance. A refueling frequency will be proposed for this surveillance.

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Critical meter and relay calibrations, such as the Watt/Var meter and frequency relays, will be verified independently as a prerequisite for these surveillance requirements. This requirement will be clarified in the Technical Specification Bases section with a listing of the associated equipment.

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

Load Restrictions

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