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SUBJECT: Submits update on progress of resolution to USI A-46 & confirm revised submittal date as discussed in conference call on 950905, response to Suppl 1 to GL 87-02. O

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DUKE POWER

October 3, 1995

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, 50-270, 50-287
Response to Supplement 1 to Generic Letter 87-02 on SQUG Resolution of USI A-46

This letter is to update the Staff on the progress of the resolution to USI A-46 and confirm the revised submittal date as discussed in our conference call on September 5, 1995.

On May 22, 1992, the Staff issued Generic Letter 87-02, Supplement 1, transmitting its review of the Generic Implementation Procedure (GIP). Adherence to the GIP would provide seismic verification of nuclear plant equipment for the resolution of USI A-46. The transmittal of Supplemental Safety Evaluation Report No. 2 (SSER No. 2) on the GIP to the Seismic Qualification Utility Group (SQUG) included the request that all utilities provide to the NRC, within 120 days, a schedule for the implementation of the GIP. In a letter dated September 21, 1992, Duke Power Company stated that the GIP would be implemented at Oconee Nuclear Station by December 31, 1995. By letter dated April 5, 1993, the Staff responded to Duke Power Company accepting the proposed program and schedule for the resolution of USI A-46.

At Oconee, the implementation of the GIP in resolution of USI A-46 has been combined with the efforts for the Individual Plant Examination for External Events (IPEEE, Reference Generic Letter 88-20, Supplement 4). In combining these two programs, several benefits have been confirmed. Many of these issues were discussed with P. Y. Chen in his recent visit to Oconee Nuclear Station while auditing the in-progress work of these programs. Two major benefits of the combined programs are: 1) the minimized marginal cost for the additional IPEEE walkdown effort with respect to the A-46 walkdown, and 2) the consistent status or conclusion for issues common to both programs. This letter only addresses the rescheduling of the SQUG submittal. The December 31, 1995 submittal date for the Oconee Nuclear Station IPEEE remains unchanged.

The current implementation status of the GIP is that over 95% of the more than 1750 Safe Shutdown Equipment List (SSEL) items have been walked down. These walkdowns have not identified any safety significant issues which would challenge the current licensing basis. These walkdown locations or items represent over 7500 pieces of individual equipment important to meeting the GIP safe shutdown needs. A large portion of the equipment on the list is contained

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within individual walkdown locations consistent with the "rule of the box" criteria found in the GIP.

In addition to the walkdowns, an evaluation of the relays which support the mechanical SSEL equipment identified over 5600 relays and contact devices which require a relay chatter review per the GIP. The two factors contributing to the large number of relays are: 1) the large number of items in the mechanical SSEL, and 2) the individual circuit configurations. The review of the relays is about 55 % complete and has not identified any safety significant issues which would challenge the current licensing basis. During this review, some low ruggedness relays have been found and detailed circuit analyses are in progress.

In the development of the initial schedule for the implementation of the GIP, a large number of relays were expected to be screened on the capacity verses demand consideration. However, existing in-structure response spectra (median centered) for the Turbine Building relay capacity verses demand screening were found to be very conservative and penalizing. Many of the relays have been preliminarily labeled as outliers awaiting more detailed reviews. Additional refinement efforts of screening in accordance with the GIP will reduce the number of premature GIP outliers, control excessive program implementation cost, and reduce the subsequent modifications to meet the USI A-46 program. Establishment of a true GIP outlier status is needed to determine our course of outlier resolution. These reviews will further evaluate such issues as: contact position, energized states, circuit analysis, existing documentation evaluations, and specific generic equipment response spectra (GERS) verses demand comparisons.

As part of the efforts to reduce the number of premature GIP outliers, we intend to re-evaluate our late 1960's vintage Turbine Building in-structure response spectra (IRS) for early vintage modeling and analysis issues. This evaluation should generate more representative values using the originally committed FSAR specifics. This represents the most cost-effective approach to resolving some of the relay and equipment issues. It is our expectation that this evaluation will not result in the reclassification of the IRS to the "conservative" classification which is contained in the GIP. The new IRS would in turn more accurately assess the relays for chatter considerations. This letter will serve as notification of our intent to possibly revise the Turbine Building IRS for the USI A-46 effort in accordance with the direction provided in Sections 1.3 and 2.2.1 of the GIP. The updated IRS constitutes a revision of the previously submitted information which was requested by the Staff and is not considered a significant or programmatic deviation from the GIP.

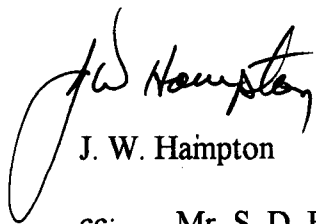
As noted by the Staff's June 15, 1995 letter to Duke Power Company, our direct employees have a familiarity with the Oconee power plant and equipment. The implementation of this program has continued to develop that strong asset. To date, the actual USI A-46 program cost has been significantly higher than originally anticipated due to outside assistance on some of our unrepresented GIP items. Duke would like to keep the relay review internal to the company for cost consideration, long term retention, and investment knowledge. This provides the most cost effective implementation of the GIP to resolve USI A-46. Rescheduling allows us to submit SQUG GIP results more in accordance with the program expectations in spite of our increased scope of equipment/relays, unrepresented GIP items, and equipment uniqueness.

The response to Generic Letter 88-20, Supplement 4, or IPEEE, will be submitted by December 31, 1995. The Oconee IPEEE submittal will include seismic event sequences and their impact on the overall core damage frequency. These analyses will provide an overall perspective of the seismic ruggedness of equipment necessary to safely shut down the plant. It is our expectation that the core damage frequency for seismic events, which will be reported in the IPEEE submittal, will not be significantly affected by the remaining relay analysis.

Duke Power Company has determined that the best long-term solution is to reschedule the submittal date for USI A-46. By rescheduling the completion date, Duke will be able to evaluate the current Turbine Building IRS and possibly generate more representative IRS. The more representative IRS should reduce the number of premature GIP outliers, control excessive program implementation cost, and reduce the number of modifications that are required to meet the USI A-46 program. In addition, rescheduling the completion date will allow Duke to implement the GIP without excessive use of outside contractors. This provides Duke with the benefit of an employee base which is familiar with the GIP program. Another benefit is that the SQUG GIP submittal results will be more in accordance with the program expectations in spite of our increased scope of equipment/relays, unrepresented GIP items, and equipment uniqueness. Since the field walkdowns have essentially been completed, which is where most of the urgent seismic issues were expected to be found, it is our expectation that the current licensing basis will not be challenged by any safety significant issues during the remaining portion of the GIP implementation. Based on the justification provided in this letter, Duke intends to issue the Oconee A-46 submittal by December 31, 1996.

I declare under penalty of perjury that these statements are true to the best of my knowledge.

Very truly yours,



J. W. Hampton

cc: Mr. S. D. Ebnetter
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