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SUBJECT: Clarifies commitment to resolve Unresolved Item 94-31-06 re high spent fuel pool radiation levels during standby shutdown facility event.

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DUKE POWER

December 20, 1995

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

Subject: Oconee Nuclear Site
Docket Nos. 50-269, -270, -287
Inspection Report 50-269, -270, -287/94-31
Unresolved Item 94-31-06

Dear Sir:

By letter dated March 9, 1995, Duke Power responded to Unresolved Item (URI) 94-31-06 regarding high spent fuel pool (SFP) radiation levels during a Standby Shutdown Facility (SSF) event. In the response to this URI, Duke committed to implement a modification, including appropriate procedure and calculation revisions, by December 31, 1995. Although the URI resulted from a review of the Unit 1 and 2 SFP inventory calculation, Duke was not unit-specific in committing to perform the SFP makeup modification, procedure revisions, and calculation upgrades. Therefore, the purpose of this letter is to clarify the commitment to resolve NRC URI 94-31-06.

During an SSF event, the SFP is the source of makeup water to the Reactor Coolant System (RCS) via the SSF Reactor Coolant (RC) Makeup System. In addition, the SFP Cooling System is unavailable to remove decay heat from the SFP during an SSF event. Therefore, the SFP inventory decreases and the SFP heats up during an SSF event. The inventory decreases slowly until the SFP water reaches the boiling point. Once the SFP reaches the boiling point, additional complications regarding SFP makeup action arise. The first concern is accessability due to airborne contamination due to pool boil-off. In addition, the SFP level will drop more rapidly due to boiling, thus increasing SFP area radiation levels and reducing the amount of time to take mitigatory action before radiation levels become preclusive to SFP access.

The revised calculations continue to indicate that the time to reach the boiling point based on SSF event assumptions is much more limiting for the Unit 1 and 2 SFP than for the Unit 3 SFP. Time to boil for the Unit 1 and 2 SFP was calculated to be approximately 9

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hours, whereas the Unit 3 SFP time to boil was determined to be about 25 hours. Therefore, more time exists for implementing contingency plans to make up to the Unit 3 SFP.

In order to meet the intent of this commitment, Duke intends to implement the SFP makeup modification on the Unit 1 and 2 SFP, along with the appropriate procedure revisions, by December 31, 1995. The modification installs a pipe with hose connections so that operators can make up to the SFP, using external water sources, without being exposed to high radiation levels. The associated procedural upgrades provide guidance on when and how to perform makeup to the SFP using the equipment which is installed by the modification.

Due to the more restrictive conditions, Duke's commitment in the March 9, 1995, letter focused on resolving this issue for the Units 1 and 2 SFP. However, Duke is also committed to resolving this issue for the Unit 3 SFP. As a result, Duke intends to complete the same modification and associated procedure revisions for the Unit 3 SFP by July 1, 1996.

If there are any further questions about this item, please contact David Nix at (803) 885-3634.

Very truly yours,

Joe M Davis
for
J. W. Hampton

cc: Mr. S. D. Ebneter, Regional Administrator
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