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ACCESSION NBR: 8209200115 DOC. DATE: 82/09/13 NOTARIZED: NO DOCKET #
 FACIL: 50-269 Oconee Nuclear Station, Unit 1, Duke Power Co. 05000269
 50-270 Oconee Nuclear Station, Unit 2, Duke Power Co. 05000270
 50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287
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 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director
 STOLZ, J.F. Operating Reactors Branch 4

SUBJECT: Forwards status of purge valve/sys review. Design change necessary to meet Requirements A & B re operation of reactor bldg purge sys currently being evaluated.

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 TITLE: Containment Purging

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September 13, 1982

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. John F. Stolz, Chief
Operating Reactors Branch No. 4

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287

Dear Sir:

By letters dated July 7 and July 17, 1981, the NRC requested certain actions of Duke Power in order to complete the review of the operation of the Reactor Building Purge System. Duke letters dated September 25 and November 6, 1981 provided status statements associated with our review of this issue. The purpose of this letter is to provide the current Duke position on this matter.

Attached please find a tabulation of the various NRC requirements associated with this issue and the current Oconee status. As noted in the table, Duke is currently evaluating the design changes necessary to meet Requirements A and B. Included in these evaluations is a cost-benefit analysis, which weighs the costs associated with the changes necessary to meet the requirements versus the benefits to be derived upon implementation of such changes. The benefit derived is the allowance for purging when the reactor coolant system is above cold shutdown. Currently there is no assurance that purging would be allowed above cold shutdown if substantial modifications were to be made to the system to meet the identified requirements. Further, there is no assurance that limited purging would be allowed if certain limited purge system modifications were made. This evaluation is attempting to take into account this uncertainty. It is requested that the Staff provide a statement advising whether or not limited purging above cold shutdown, on the order of 200 hours per reactor per year, is a viable option if certain limited modifications have been implemented.

Upon completion of this evaluation, Duke will advise the Staff of our decision with regard to modifications and purge operation. In the interim, Duke will continue to maintain the purge valves at Oconee closed except when in cold shutdown mode.

Concurrent with the above system and valve evaluations, Duke is preparing draft Technical Specifications. Of necessity, these must await final decisions associated with system and valve modifications, and thus cannot be proposed until such decisions have been made.

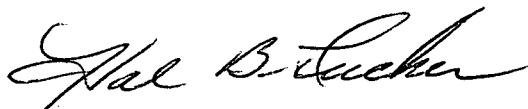
Duke will advise the NRC when a decision has been reached regarding any modifications to these systems. NRC response to the above request would expedite reaching a final decision.

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Mr. Harold R. Denton, Director
September 13, 1982
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Very truly yours,

A handwritten signature in cursive script, appearing to read "Hal B. Tucker".

Hal B. Tucker

RLG/php
Attachment

Oconee Nuclear Station
Status of Purge Valve/System Review

<u>Requirement</u>	<u>Status</u>
A. Meet the requirements of BTP CSB 6-4 (Rev. 1) ^{1,2}	Draft evaluation complete and under review.
B. Meet the valve operability guidelines (NRC letter of 09/27/79) ¹	Review by Pratt in-house and under review.
C. Safety actuation signal override ¹	Complete ^{1,3} with exception of radiation closure signal. (See Item E, Position 7 below.)
D. Containment leakage due to seal deterioration ¹	Draft Technical Specifications in preparation.
E. Action Plan Item II.E.4.2 Position 1 - Design shall meet SRP 6.2.4 Position 2 - Designation of essential/non-essential systems Position 3 - Automatic isolation of non-essential systems Position 4 - Safety signal override Position 5 - Pressure setpoint Position 6 - Verify valves closed Position 7 - Auto-valve closure on radiation signal	Complete ³ Complete ³ Complete ³ Complete ³ Complete ⁴ Implemented ⁵ Response Provided ⁵
F. System LCO Technical Specifications ²	Draft Technical Specifications in preparation
G. Reduced diameter purge system ²	Evaluation in progress

References

1. NRC letter of July 7, 1981
2. NRC letter of July 17, 1981
3. NUREG-0737, NRC letter of October 31, 1980
4. NRC letter of July 15, 1981
5. WOP letter of January 2, 1981