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       50-287 Oconee Nuclear Station, Unit 3, Duke Power Co.      05000287  
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 RECIP. NAME      RECIPIENT AFFILIATION  
 EISENHUT, D.G.      Division of Licensing  
 DENTON, H.R.      Office of Nuclear Reactor Regulation

SUBJECT: Forwards response to NRC 800507 ltr re addl requirements from TMI Action Plan. Response contains implementation schedule & summary stating util commitments re requirements.

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DUKE POWER COMPANY

POWER BUILDING

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WILLIAM O. PARKER, JR.  
VICE PRESIDENT  
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June 13, 1980

TELEPHONE: AREA 704  
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Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Mr. D. G. Eisenhut, Director  
Division of Licensing

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

Dear Sir:

Your letter of May 7, 1980 to all Operating Reactor Licensees requested commitments to meet the five additional TMI-2 related requirements contained therein. My letter of June 2, 1980 requested additional information on several of those requirements. The Staff provided a response to this request by letter dated June 10, 1980. In response to your request, attached please find our response for Oconee Nuclear Station to the requirements listed in Enclosure 1 of your letter.

For Item II.K.3.5, further interaction with the Staff appears to be necessary to establish an acceptable schedule for completion of this item, thus a commitment is not provided.

For Item II.K.3.17, based on the information provided by the Staff and a review of Oconee Technical Specifications, substantial outage times of ECC system are not permitted. Further clarification of the basis of this item is requested prior to conducting the requested review. Absent further guidance from the NRC, no additional action will be taken on this item.

For Item II.K.3.30, the Staff has not identified any specific areas where changes are necessary to the existing model. Therefore, it is not apparent that a revised model needs to be submitted for Staff approval. Action will be taken as described in the attached.

Very truly yours,

*William O. Parker, Jr.*  
William O. Parker, Jr. *By [Signature]*

RLG:scs  
Attachment

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DUKE POWER COMPANY  
OCONEE NUCLEAR STATION

Response to Enclosure 1,  
Implementation Schedule and Summary  
NRC Letter of May 7, 1980

- I.A.1.3 Shift Manning - The May 7, 1980 letter states that the requirements for implementation of this item will be provided shortly through separate correspondence. Duke will provide a response to this item 30 days from receipt of the above referenced information.
- I.A.3.1 Revise Scope and Criteria for Licensing Examinations - Duke has discussed implementation of the requirements contained in NRC letter of March 28, 1980 with the Staff. As a result of such discussions, it is considered that the Duke program as implemented meets the intent of the requirements in this letter.
- I.C.5 Procedures for Feedback of Operating Experience to Plant Staff - Duke will implement procedures for feedback of operating experience to plant staff by January 1, 1981. A description of this program will be available for NRC review by January 1, 1981.
- II.K.3.1 Install automatic PORV Isolation System and Perform Operational Test - If determined necessary by II.K.3.2 below, a proposed design will be provided by July 1, 1981. The modification will be installed and tested the first refueling outage following six months after NRC Staff approval of the design.
- II.K.3.2 Report on Overall Safety Effect of PORV Isolation System - A report in response to this item will be prepared and submitted by January 1, 1981.
- II.K.3.3 Report Safety and Relief Valve Failures Promptly and Challenges Annually - Reactor Coolant System safety and relief valve failures will be reported pursuant to Oconee Nuclear Station Technical Specification 6.6.2.1. Reactor Coolant System relief and safety valve challenges for each year will be reported annually, commencing with those challenges occurring in 1980.
- II.K.3.5 Continue to Study Need for C.1.4.c and Need for Automatic Trip of RCP's then Modify Procedures or Designs as Appropriate - Completion of the evaluation in this area is closely tied with tests being run at the LOFT Facility. In particular, the Staff desires that test predictions be performed on L3-6 which is currently scheduled for December 1980. A meeting was held with industry representatives and the NRC Staff on May 22, 1980 to discuss the concern. In consideration of the above, the January 1, 1981 date for evaluation completion does not appear to be achievable. Further interaction with the Staff appears to be necessary to resolve this issue. A revision of the scheduled date is requested.

- II.K.3.9 Not applicable to Oconee.
- II.K.3.10 Not applicable to Oconee.
- II.K.3.12 Not applicable to Oconee.  
thru  
II.K.3.16
- II.K.3.17 Report on Outage of ECC Systems - Licensee Report and Proposed Technical Specification Changes - The purpose of this item is not clear. For Oconee, the permitted outage times for components of ECC systems are not substantial. The Oconee Technical Specifications are consistent with, and in some cases more restrictive than, the B&W Standard Technical Specifications. In no cases have cumulative outages occurred nor are they allowed. Therefore, based on the information provided in the May 7, 1980 letter and the above, no further action is considered necessary and no commitment is provided in response to this item.
- II.K.3.18 Not applicable to Oconee.  
thru  
II.K.3.22
- II.K.3.24 Not applicable to Oconee.  
thru  
II.K.3.29
- II.K.3.30 Revised Small Break LOCA Methods to Show Compliance with 10CFR 50 Appendix K - The currently used small break ECCS evaluation model has previously been revised and approved by the Staff and conforms to the requirements of 10CFR 50, Appendix K. The Staff has not identified any specific areas where changes are necessary to the existing model. Following completion of the LOFT small break tests, we would examine the need for revisions to the current evaluation model. If changes are deemed necessary, appropriate model changes would be submitted for Staff review.
- II.K.3.31 Plant Specific Calculations to Show Compliance with 10CFR 50.46 - Based on the results of the efforts in II.K.3.30, appropriate small break analysis will be performed. If changes in the small break evaluation model occur as a result of the effort in Item II.K.3.30, plant small break ECCS analysis will be provided one year after Staff approval of the revised model.
- II.K.3.44 Not applicable to Oconee.  
thru  
II.K.3.46
- II.K.3.57 Not applicable to Oconee.
- III.D.3.4 Control Room Habitability - A review of the Oconee control room design with respect to habitability and utilizing appropriate criteria will be completed by January 1, 1981. Any modifications determined necessary by this review, will be completed by January 1, 1983.