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 50-287 Oconee Nuclear Station, Unit 3, Duke Power Co.

DOCKET #  
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AUTH.NAME AUTHOR AFFILIATION  
 PARKER,W.O. Duke Power Co.  
 RECIP.NAME RECIPIENT AFFILIATION  
 DENTON,H.R. Office of Nuclear Reactor Regulation, Director  
 REID,R.W. Operating Reactors Branch 4

SUBJECT: Summarizes actions undertaken by util re inadequate core cooling NRC review of previously submitted operator guidelines should be completed prior to util committing to install new instrumentation.

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# DUKE POWER COMPANY

POWER BUILDING

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WILLIAM O. PARKER, JR.  
VICE PRESIDENT  
STEAM PRODUCTION

June 27, 1980

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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. R. W. Reid, Chief  
Operating Reactors Branch No. 4

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

Dear Sir:

The concern of Inadequate Core Cooling has been the subject of discussions recently between the Staff and industry. The purpose of this letter is to summarize the actions that were undertaken by Duke Power with regard to this subject for Oconee Nuclear Station.

Inadequate Core Cooling guidelines for operator actions and identification of new instrumentation were initially addressed in July 1979 by NUREG-0578. Subsequently, IE Bulletin 79-05C issued in July 1979 required, among other things, the development and implementation of guidelines and procedures related to Inadequate Core Cooling. Duke Power, as a member of the B&W Owners Group, initiated a generic effort in this area and met with the NRC Staff on September 13, 1979 to discuss our proposed course of action for Inadequate Core Cooling considerations. As a result of this meeting, additional analysis efforts were undertaken at the Staff's request. The following paragraphs summarize our submittals pertaining to Inadequate Core Cooling.

In a letter dated November 9, 1979, we submitted a document entitled "Analysis Summary in Support of Inadequate Core Cooling Guidelines for a Loss of RCS Inventory." Staff review of this generic B&W document was expected concurrent with procedure development and operator training. To date, no Staff response to this submittal has been received. Our review of these guidelines and of available additional instrumentation continued as documented in our letters of October 18, 1979, November 21, 1979, January 2, 1980 and January 31, 1980.

Through this time period, we concluded that the operator guidelines that were provided for Staff review did not identify the need for any additional instrumentation and that the currently available systems for use as Reactor Vessel level instrumentation were unacceptable and did not meet all the Staff requirements contained in NUREG-0578 and the clarification letter of October 31, 1979.

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Mr. Harold R. Denton, Director  
June 27, 1980  
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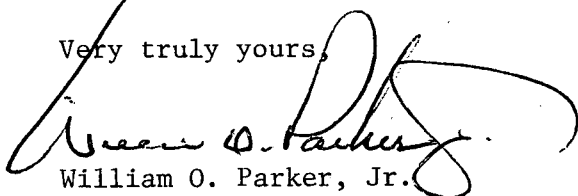
This conclusion was submitted to the Staff by letter dated January 31, 1980. Item 2.1.3.b of NUREG-0578 which requires installation of additional instrumentation also requires Staff review and approval prior to implementation. As stated above, our conclusion in January was that no additional instrumentation was required. As of yet, there has been no Staff response to this conclusion.

Furthermore, in a letter dated January 23, 1980, additional proposed operator guidelines covering operating conditions requested by the Staff in September 1979 was submitted for Staff review. This submittal continues to support the conclusion that no additional instrumentation for the detection of Inadequate Core Cooling is required. As in the previous submittals, there has been no Staff response to this document.

It is our position that the Staff should complete its review of the previously submitted operator guidelines prior to Duke committing to install any new instrumentation to aid the operator in preventing Inadequate Core Cooling (e.g. RV level indication). Once this review is completed, the need for instrumenting additional parameters or functions can be identified, and, then viable designs pursued. However, until the operator guidelines are reviewed and approved by the Staff, the extent of the additional instrumentation cannot be finalized. It is requested that the Staff complete its review of these guidelines in a timely manner.

Concurrent with the Staff's review, Duke will continue to review available instrumentation that could be utilized in a system to detect Inadequate Core Cooling. However, because such a design is not readily available, and Staff approval of such design when available needs to be obtained, the January 1, 1981 implementation schedule is not achievable.

Very truly yours,

A handwritten signature in dark ink, appearing to read "William O. Parker, Jr.", is written over the typed name. The signature is fluid and cursive, with a large, sweeping "P" and "K".

William O. Parker, Jr.

RLG:scs