

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 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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SUBJECT: Forwards rev to 850909 response to NRC request for addl info
 re open items in Reg guide 1.97. Core flood tank level &
 pressure not key variables for design basis events which
 result in harsh environ.

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 TITLE: OR/Licensing Submittal: Suppl 1 to NUREG-0737(Generic Ltr 82-33)

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February 18, 1986

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

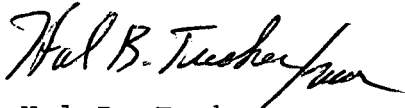
Attention: Mr. J. F. Stolz, Chief
Operating Reactors Branch No. 4

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

Dear Sir:

By letter dated September 9, 1985, Duke Power Company (Duke) submitted a response to a NRC request for additional information concerning five (5) Open Items in regard to Regulatory Guide 1.97. Please find attached a revised response to one of the Open Items.

Very truly yours,



Hal B. Tucker

PFG:slb

Attachment

cc: Dr. J. Nelson Grace, Regional Administrator
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Mr. J. C. Bryant
NRC Resident Inspector
Oconee Nuclear Station

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Attachment
Duke Power Company
Oconee Nuclear Station
Response to Request For Additional Information:
Emergency Response Capability - Regulatory Guide 1.97
NRC Letter Dated July 11, 1985

- (1) Accumulator tank level and pressure-environmental qualification should be addressed in accordance with 10 CFR 50.49 (Section 3.37).

Response

The primary function of this instrumentation is to monitor the pre-accident status of the core flood tanks to assure that this passive safety system is in a ready state to serve its safety function. The only safety function of the core flood tanks is to empty upon rapid, uncontrolled depressurization of the primary system. No operator actions are based on core flood tank level and pressure instrumentation are required in order to mitigate the consequences of design basis events which may cause a harsh environment. The only operator action involving the core flood tanks portion of the Safety Injection system is to isolate the core flood tanks when the primary system pressure is below 1000 psig and primary system conditions indicate that the core flood tank inventory is not needed to makeup lost RCS volume. That action is based on system pressure for which fully qualified instruments are provided (see variable sheet A-1, from the original response to RG 1.97). Therefore, it is Duke's position that for Oconee Nuclear Station the core flood tank level and pressure are not key variables for any design basis events which result in a harsh environment. Providing environmental qualification for the post accident in-containment harsh environment is not required in that the instruments have no post-accident safety function nor provide any required post accident monitoring function.