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 50-269 Oconee Nuclear Station, Unit 1, Duke Power Co. 05000269
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SUBJECT: Responds to NRC 870819 inquiry re practice of B&W plant owners of utilizing planned reactor trips to affect once through steam generator cleaning. Practice used only once at TMI-1 under controlled conditions.

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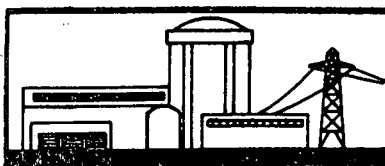
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Bethesda, Maryland 20814
(301) 951-3344

September 4, 1987

Mr. Frank Miraglia
Associate Director for Projects
Office of Nuclear Reactor Regulation
Nuclear Regulatory Commission
Washington, DC

Dear Mr. Miraglia:

Subject: B&W Owners Group Review of Planned Plant
Trips

This is in response to your letter of August 19, 1987 to the B&W Owners Group. In that letter, you questioned the practice of some B&W plant owners utilizing planned reactor trips to affect Once Through Steam Generator (OTSG) performance. You state several owners are performing such practices; that it is perceived by you as the means selected by the owners for the "cleaning" of the OTSGs for the life of plant; and that such practices appear contrary to the B&W Owners Group SPIP objectives.

During a recent meeting of the B&W Owners Group, we did review the questions which you have raised. The practice referred to has been performed by one of the B&W owners (GPU Nuclear, TMI-1) and performed one time. As an Owners Group, we believe there may be some misconceptions on the part of the NRC Staff. First, none of the owners, including GPU Nuclear, believe that any of the current practices used to affect crude deposition and steam generator performance are viewed as long term solutions to the basic problem. The long term solution is unanimously viewed as infrequent but periodic chemical cleaning of the steam generators. Individual owners, working both independently and with other

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industry groups, are pursuing the final chemical cleaning approach. The first B&W unit (Duke, Oconee) will be chemically cleaned this Fall and other owners have joined with EPRI in final process qualification for alternate chemical cleaning techniques. Depending upon the individual status of each owner in preparing for cleaning, current plant schedules for refueling, and other considerations, all owners are not in a position to immediately chemically clean but probably most will be by the early 1990s.

During what is expected to be a limited interval between now and when a fully qualified chemical cleaning process is available, the owners that have experienced steam generator power limitations have available two principal techniques for interim relief. One of these techniques is referred to as "water slap," involving pulsed nitrogen injection into the secondary side of the generator, while the plant is shut down, to dislodge and clear the metal oxides affecting blockage. This technique has been used at the Oconee, Crystal River and Arkansas Unit 1 plants. The other approach was the one planned trip of the plant performed by GPU Nuclear at TMI. Each of these approaches has met with variable degrees of success and neither, as mentioned earlier, is viewed as a long term or life of plant process. A number of other approaches have been tried without success.

We have briefly reviewed the trip selection process as performed by GPU Nuclear. That process involved a review of the alternatives, the performance of a detailed safety assessment, specific training, and the performance of the trip under controlled conditions, with plant procedures, and with extra operating and technical staff support present. The trip itself, in many respects, is very similar to planned trips or tests conducted routinely during startup of new plants. Such a planned sequence of events is not viewed by the Owners Group as contradictory to the SPIP program which addresses the reduction of post trip complexity and unplanned trips. Unplanned trips generally stem from operator or maintenance error, or equipment failure, and are circumstantially not the same as a carefully controlled plant evolution.

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In summary, long term actions are underway to chemically clean steam generators, and in the interim, efficient operation of the OTSGs is important to overall plant performance. We, as the Owners Group, do not plan to use reactor trip as the methodology to short term cleanliness of the OTSG. In fact, most of our group do not employ the method. Interim steps have been used to deal with generator fouling on a temporary basis including the water slap process and the single occasion of a reactor trip and they have only been applied after careful consideration of alternatives, under controlled conditions and after specific safety reviews. The decision making process seems appropriate. We trust this letter provides you with the information requested.

Very truly yours,



Walter S. Wilgus
Chairman
B&W Owners Group

WSW/lmh

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