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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

AUTH. NAME AUTHOR AFFILIATION
 LEE, W.S. Duke Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director
 STOLZ, J.F. Operating Reactors Branch 4

SUBJECT: Application for amend to Licenses #DPR-38, DPR-47 & DPR-55,
 granting one-time extension of inoperability of Reactor Bldg
 Cooling Train 3A to 14 days. Proposed Tech Spec change &
 technical justification encl. Fee paid.

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DUKE POWER COMPANY

P. O. Box 33189

CHARLOTTE, N. C. 28242

WILLIAM S. LEE
CHAIRMAN OF THE BOARD &
CHIEF EXECUTIVE OFFICER
(704) 373-4283

DOUGLAS W. BOOTH
PRESIDENT &
CHIEF OPERATING OFFICER
(704) 373-4702

April 11, 1985

Mr. H. R. Denton
Office of Nuclear Reactor Regulation
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:

Pursuant to 10 CFR 50, §50.90, please find attached (Attachment 1) a proposed change to the Oconee Nuclear Station (ONS) Technical Specifications. The proposed change would permit Oconee Unit 3 to continue to operate at full rated power while effecting repair of the "A" Reactor Building Cooling (RBC) train.

Specifically, this amendment request would grant a one-time extension of inoperability for the "3A" RBC train of no longer than 14 days, which includes the 7 days allowed by Specification 3.3.5.C.(2)(b), plus 7 additional days. Duke, at this time, does not anticipate requiring the full 7 additional days to repair and return to service the inoperable RBC train. Currently, Duke projects installation of the replacement fan motor by April 12, 1985 and after completing the Function test, returning the "3A" RBC train to Service by April 13, 1985. This is a very optimistic schedule and assumes that no problems are encountered.

Duke contends that this amendment request is in accordance with the provisions of 10 CFR 50, §50.91 (a)(5), in that an emergency situation exists and, thus, should be processed accordingly. In this particular situation, if the commission fails to act in a timely manner, a shutdown of unit 3 would be required on April 13, 1985 per Specification 3.3.5.c.1(2)(c). The evolution of events comprising this situation are provided in the subsequent paragraphs and explains why this emergency situation occurred and why it could not have been avoided.

On April 6, 1985, a high outer motor bearing temperature "Stat-Alarm" was received by Control Room personnel. Upon investigating, it was discovered that the motor for the "3A" RBC fan had open windings. The "3A" RBC train was declared inoperable at 0933 hours on April 6, 1985. At that time, unit 3 entered the degraded mode specified by Specification 3.3.5.3.(2)(c).

When the RBC train was declared inoperable, a search for a replacement fan motor was initiated. A spare motor was located on Monday (April 8th), but needed to be refurbished. The replacement motor was available to be installed by April 10, 1985.

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In order to return "3A" RBC train to service, the fan motor for the "3A" RBC train required replacement. Most of the components for the RBC system, including the fan motor, are located inside the Reactor Building (RB). The temperature inside the RB at the time of discovery prohibited any long term maintenance activity, as would be required to replace the RBC fan motor. In order to allow for repair, the temperature inside the RB needed to be reduced. To accomplish this task, a temporary modification to provide cool air to the work area, where personnel involved in the fan motor replacement would be, was developed and implemented. This temporary modification, providing additional cooling of the local area, was completed on April 10, 1985. This reduced the local temperature sufficiently to allow access by personnel to replace the RBC fan motor.

Although the local area temperature was reduced, the temperature still remains very high. This results in an environment barely tolerable to personnel in the area, impacting the time required to replace the fan motor. Duke currently projects that the "3A" RBC train will be returned to service by April 13, 1985, assuming all goes well.

Duke has, from the time of discovery, exerted best efforts to effect repairs and, thus, to return "3A" RBC train to service. This included a diligent effort to establish a habitable environment, which would support the activities associated with the replacement of the fan motor. Duke remains committed to installing the replacement fan motor and returning the inoperable RBC train to service prior to the expiration of the time interval allowed by the Limiting Condition for Operation (LCO) applicable to this situation (i.e. Specification 3.5.5.C.(2)(b)).

It should be further noted that prior to the "Stat-Alarm" Annunciation, there were no other symptoms which would have indicated failure of the 3A RBC fan motor. In fact, all signs indicated that there was no problem. Specifically, as required by Specification 4.5.2.1.2.9, a system test was conducted during the recent refueling outage for unit 3 (May 19, 1984), which demonstrated system operability. In addition to this system test, the "A" and "C" RBC trains are operated during normal plant operation.

In sum, the inoperability of the "3A" RBC train was not discovered until April 6, 1985 and could not have been predicted prior to then. Best efforts have been exerted, and continued to be exerted, to return the inoperable RBC train to service. Therefore, this situation could not have been avoided and, thus, Duke did not create the emergency in order to take advantage of the provision set forth in 10 CFR 50, §50.91 (a)(5).

Attachment 2 provides the Technical Justification for the proposed amendment. In addition, as required by 10 CFR 50.91, Duke has performed a No Significant Hazards Consideration evaluation (Attachment 3) in accordance with the standards in 50.92. This analysis has determined that proposed amendment request does represent a No Significant Hazard Consideration. Duke is forwarding a copy of this application to the South Carolina Department of Health and Environmental Control for review and, as appropriate, subsequent consultation with the NRC staff.

To cover the application fee in accordance with 10 CFR 170.12, enclosed in a check in the amount of \$150.00.

Very truly yours,



William S. Lee

cc: Mr. James P. O'Reilly, Regional Administrator
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Ms. Helen Nicolaras
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. J. C. Bryant
NRC Resident Inspector
Oconee Nuclear Station

Mr. Hayward Shealey, Chief
Bureau of Radiological Health
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Mr. Harold R. Denton, Director
April 11, 1985

WILLIAM S. LEE, being duly sworn, states that he is Chairman of the Board and Chief Executive Officer of Duke Power Company; that he is authorized on the part of said Company to sign and file with the Nuclear Regulatory Commission this request for amendment of the Oconee Nuclear Station Technical Specifications, Appendix A to Facility Operating Licenses DPR-38, DPR-47, and DPR-55; and that all statements and matters set forth therein are true and correct to the best of his knowledge.

William S. Lee
William S. Lee, Chairman of the Board
Chief Executive Officer

Subscribed and sworn to before me this 11th day of April, 1985.

Due C. Sherrill
Notary Public

My Commission Expires:

September 20, 1989