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 50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287
 AUTH. NAME: TUCKER, H. B. AUTHOR AFFILIATION: Duke Power Co.
 RECIP. NAME: DENTON, H. R. RECIPIENT AFFILIATION: Office of Nuclear Reactor Regulation, Director (pre-851125)
 STOLZ, J. F. Operating Reactors Branch 4

SUBJECT: Application for amend to License DPR-38, DPR-47 & DPR-55, consisting of scheduler changes to 830318 confirmatory order, affirming commitments on NUREG-0737, Items II.B.3 & II.F.1 re post-accident sampling sys. Fee paid.

DISTRIBUTION CODE: A046D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 11
 TITLE: OR Submittal: TMI Action Plan Rgmt NUREG-0737 & NUREG-0660

NOTES: AEOD/Ornstein: 1cy. 05000269
 OL: 02/06/73
 AEOD/Ornstein: 1cy. 05000270
 OL: 10/06/73
 AEOD/Ornstein: 1cy. 05000287
 OL: 07/19/74

RECIPIENT ID. CODE/NAME	COPIES LTR ENCL	RECIPIENT ID. CODE/NAME	COPIES LTR ENCL
PWR-B PD6 PD 01	5 5		
INTERNAL: ACRS 34	10 10	ADM/LFMB	1 0
ELD/HDS4	1 0	IE/DEPER DIR 33	1 1
IE/DEPER/EPB	3 3	NRR BWR ADTS	1 1
NRR PAULSON, W.	1 1	NRR PWR-A ADTS	1 1
NRR PWR-B ADTS	1 1	NRR/DHFT	1 1
NRR/ORAS 18	3 3	REG. FILE 04	1 1
RGN2	1 1		

EXTERNAL: 24X	1 1	LPDR 03	1 1
NRC PDR 02	1 1	NSIC 05	1 1

NOTES: 1 1

*u/check \$1500
 #18225188*

DUKE POWER COMPANY

P.O. BOX 33189
CHARLOTTE, N.C. 28242

HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

November 14, 1985

TELEPHONE
(704) 373-4531

Mr. Harold R. Denton, Director
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:

By letter dated March 18, 1983, the NRC issued a Confirmatory Order concerning certain Post-TMI actions. This Order requires that Duke implement and maintain certain TMI modifications among which is the Noble Gas Stack High Range Radiation Monitor (NUREG-0737 Item II.F.1(a)).

By letters dated April 16, 1982, November 15, 1982, March 1, 1983 and May 19, 1983, Duke notified the NRC of the erratic behavior of the noble gas stack high range radiation monitors that were installed on each unit. These letters described the problem (moisture contamination of the cable connectors), steps taken to resolve the problem and dates for completing the specific steps. All efforts undertaken thus far, as described in the above letters, failed to correct the problem.

By letter dated September 24, 1984, Duke advised the NRC of additional actions initiated in an effort to restore operability to these monitors. In addition, the September 24, 1984 letter described compensatory measures that will be taken while pursuing final resolution of the problem.

Furthermore, within the September 24, 1984 letter, Duke committed to provide scheduler information in regard to the installation of the replacement monitors. To this end, Duke anticipates installing the replacement monitors and have them operational by the end of Cycle 9 (EOC-9) for Unit 1; and EOC-8 for Unit 2; for Unit 3, the replacement monitor was installed during the EOC-8 refueling outage. Based upon Duke's current operating schedule, EOC-9 for Unit 1 will occur in the first quarter of 1986; and EOC-8 for Unit 2 will occur in the third quarter of 1986.

By a letter dated June 3, 1985, Duke was advised by the NRC that a license amendment to Oconee's Facility Operating Licenses would need to be requested if Duke wishes to amend the March 18, 1983 Confirmatory Order. In response, Duke requests that the letter dated September 24, 1984 be considered a proposed license amendment to Facility Operating Licenses DPR-38, DPR-47 and DPR-55 for Oconee Nuclear Station Units 1, 2 and 3 respectively.

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Mr. Harold R. Denton, Director
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Prior to the events concerning the noble gas stack high range radiation monitors, Duke had requested that the March 18, 1983 Confirmatory Order be amended to reflect a new implementation schedule for other Post-TMI Items. Specifically, Item II.B.3 (Post-Accident Sampling System) and Item II.F.1(3) (Reactor Building High Range Radiation Monitors). The specific request was provided by my letter dated August 26, 1983. Preceding the August 26, 1983 letter, my letters of August 15 and 17, 1983 provided to the NRC information regarding the above two items required by the March 18, 1983 Confirmatory Order.

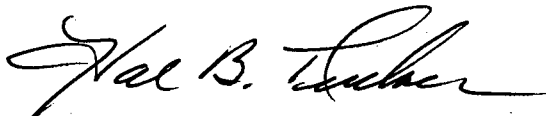
These two NUREG-0737 Items (II.B.3 and II.F.1(3)) have been fully implemented by Duke at Oconee and are currently operable. However, the actual implementation dates for these items were after the specified dates in the March 18, 1983 Confirmatory Order. Therefore, the Confirmatory Order needs to be revised to reflect the actual implementation date.

As was previously requested, Duke requests that the August 26, 1983 letter be considered a proposed license amendment to Facility Operating Licenses DPR-38, DPR-47 and DPR-55 for Oconee Units 1, 2 and 3 respectively. In support of the proposed license amendment, as requested in the August 26th letter, the information provided in my letters dated August 15, 1983 and August 17, 1983 is offered.

Attachment 1 contains the proposed amendment to the March 18, 1983 Confirmatory Order for Post-TMI related actions. Attachment 2 discusses the justification in support of the proposed amendment. Attachment 3 provides an analysis performed in accordance with the standards contained in 10 CFR 50.92 as required by 10 CFR 50.91. This analysis concludes that the proposed amendments do not adversely impact safety or the environment. By copy of this letter, Duke is forwarding a copy of this application to the South Carolina Department of Health and Environmental Control.

As required by 10 CFR 170.12, a check in the amount of \$150.00 is enclosed since this request involves one application for amendment to Oconee's Operating License.

Very truly yours,



Hal B. Tucker

PFG:slb

Attachments

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

Mr. Harold R. Denton, Director
November 14, 1985
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cc: Dr. J. Nelson Grace, 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

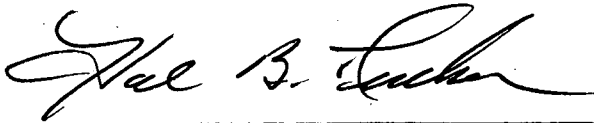
Mr. Heyward Shealy, Chief
Bureau of Radiological Health and Environmental Control
2600 Bull Street
Columbus, South Carolina 29201

Mr. Harold R. Denton, Director

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HAL B. TUCKER, being duly sworn, states that he is Vice President 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 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.



Hal B. Tucker, Vice President

Subscribed and sworn to before me this 14th day of November, 1985.



Notary Public

My Commission Expires:

September 20, 1985

Attachment 1
Duke Power Company
Oconee Nuclear Station

Proposed Facility Operating License Amendment

Order Confirming Licensee Commitments
On Post-TMI Related Issues
(Dated March 18, 1983)

LICENSEE'S COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS FROM GENERIC LETTER 82-05

Attachment 1 Pg. 1

Item	Title	NUREG-0737 Schedule	Requirement	Licensee's Completion Schedule (or status)*
I.A.3.1	Simulator Exams	10/1/81	Include simulator exams in licensing examinations	Complete-All Units
II.B.2	Plant Shielding	1/1/82	Modify facility to provide access to vital areas under accident conditions	Complete-All Units
II.B.3	Post-Accident Sampling	1/1/82	Install upgrade post-accident sampling capability	Unit 1 - Refueling outage (10/84) Unit 2 - Refueling outage (2/85) Unit 3 - Refueling outage (3/84)
II.B.4	Training for Mitigating Core Damage	10/1/81	Complete training program	Complete-All Units
II.E.1.2	Aux. Feedwater Initiation & Flow Indication	7/1/81	Modify instrumentation to level of safety grade	Complete-All Units
II.E.4.2	Containment Isolation Dependability	7/1/81	Part 5 - lower containment pressure setpoint to level compatible w/normal operation	Complete-All Units
		7/1/81	Part 7-isolate purge & vent valves on radiation signal	Complete-All Units

Item	Title	NUREG-0737 Schedule	Requirement	Licensee's Completion Schedule (or status)*
II.F.1	Accident Monitoring	1/1/82	(1) Install noble gas effluent monitors	Unit 1 - Refueling outage (4/86) Unit 2 - Refueling outage (8/86) Unit 3 - Refueling outage (9/85)
		1/1/82	(2) Provide capability for effluent monitoring of iodine	Complete-All Units
		1/1/82	(3) Install containment radiation high-range monitors	Unit 1 - Refueling outage (10/84) Unit 2 - Refueling outage (9/83) Unit 3 - Refueling outage (3/84)
		1/1/82	(4) Provide continuous indication of containment pressure	Complete-All Units
		1/1/82	(5) Provide continuous indication of containment water level	Complete-All Units
		1/1/82	(6) Provide continuous indication of hydrogen concentration in containment	Complete-All Units
II.K.2.10	Safety Grade Trips	7/1/81	Install anticipatory reactor trips	Complete-All Units

*Where completion date refers to a refueling outage (the estimated date when the outage begins), the item will be completed prior to the restart of the facility.

Attachment 2

Duke Power Company
Oconee Nuclear Station

Technical Justification

Technical Justification

The proposed amendment to the facility operating licenses for Oconee Nuclear Station consists of only a schedular change to an Order confirming licensee commitments on Post-TMI related items which was issued by a March 18, 1983 NRC letter. The three specific items of concern which requires a schedular revision to the Confirmatory Order are:

- a) Item II.B.3 - Post Accident Sampling System
- b) Item II.F.1(1) - Noble Gas Effluent Monitor
- c) Item II.F.1(3) - Reactor Building High Range Radiation Monitor

Items II.B.3 and II.F.1(3) have been fully implemented by Duke and are currently operable. However, the actual implementation dates for these items were after the specified dates in the March 18, 1983 Confirmatory Order. Additional discussion of the situation related to these items and the plan to resolve; and effectively implement these items are provided by Duke letters dated August 15, 17 and 26, 1983.

The evolution in regard to the installation and operation of Noble Gas Effluent Monitors (Item II.F.1(1)) have been documented by Duke letters dated April 16, 1982; July 28, 1982; November 15, 1982; and March 1, 1983. Subsequent to the issuance of the Confirmatory Order the NRC had been notified by Duke in letters dated May 19, 1983 and September 24, 1984 of the continued unreliability of these monitors.

In summary, the monitors had been installed on all units prior to January 1, 1982; however, due to their erratic behavior, the monitors have proved to be unreliable. Duke's efforts in trying to resolve the problem were unsuccessful. Additional actions, as stated in the September 24, 1984 letter, were initiated in order to restore operability to these monitors. The compensatory measures which have been implemented, as discussed in the September 24th letter, are adequate to assure that the capability to detect and measure concentrations of noble gas effluents released during and following an accident are met. The corrective actions currently being pursued by Duke on resolving the unreliability of these monitors has reasonable assurance of success, inasmuch as the replacement monitors are currently installed and operating at Duke's McGuire and Catawba Nuclear Stations.

In conclusion, the proposed amendment to Oconee's facility operating licenses concerns a revision to the March 18, 1983 Confirmatory Order and have only to do with schedules for implementation. Duke has taken appropriate corrective actions regarding the delays, in resolving the problems encountered and has made a responsible effort to implement these three Post-TMI action items (Items II.B.3, II.F.1(1), and II.F.1(3)). Furthermore, appropriate interim compensatory measures were provided. In this regard, the amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated, nor a significant reduction in a margin of safety and will not create the possibility of a new or different kind of accident from any previously evaluated accident.

Attachment 3

Duke Power Company
Oconee Nuclear Station

No Significant Hazards Consideration Evaluation

No Significant Hazards Consideration Evaluation

Pursuant to 10 CFR §50.91, Duke Power Company (Duke) has performed an analysis using the standards promulgated in §50.92 and has made the determination that this amendment request involves a no significant hazards consideration. This ensures that operation of the facility in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

The proposed amendment to the facility operating licensees DPR-38, DPR-47 and DPR-55 consists of only a schedular revision to a Confirmatory Order on the implementation of certain Post-TMI related items, which was issued March 18, 1983. The specific items of concern are:

- (a) Item II.B.3 - Post Accident Sampling System
- (b) Item II.F.1(1) - Noble Gas Effluent Monitor
- (c) Item II.F.1(3) - Reactor Building High Range Radiation Monitor

A discussion of each of the above Items is provided in the Technical Justification (Attachment 2). The Technical Justification, in conjunction with the identified Duke letters, provides a discussion of the situation, the compensatory measures taken, and a plan, including schedule, by which Duke intends to resolve problems encountered during initial implementation.

In summary, the proposed facility operating licensees amendment has only to do with schedules for implementation. As such, Duke concludes that: 1) appropriate corrective actions to resolve the problems regarding the delay have been taken; 2) that there was good cause for the delays encountered during initial implementation; and 3) appropriate interim compensatory measures were taken. In this regard, the proposed license amendment herein does not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

Based upon the preceding, Duke Power Company concludes that the proposed amendments do not involve a significant hazard consideration.