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SUBJECT: Advises that Util currently preparing alternative Tech Specs based on practical approach from operational & maint limitation point of view. Tech Specs will be submitted by 870515.

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March 9, 1987

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

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

Gentlemen:

By letter dated July 26, 1986 Duke Power Company (Duke) submitted a proposed amendment to the Oconee Facility Operating License and revision to the Oconee Technical Specifications. This proposal consisted of several changes to assure the operability of the Oconee Standby Shutdown Facility (SSF). The proposed Technical Specifications were submitted in response to the NRC letter dated April 28, 1983.

Duke's proposed Technical Specifications for SSF required an inoperable SSF component to be restored to operable status within 7 days or provide compensatory action and return the SSF component to operable status within 60 days or be in hot shutdown within the next 12 hours and cold shutdown within the following 48 hours.

By letter dated January 23, 1987 the NRC concluded, based on seismic consideration of Emergency Feedwater (EFW) system and a review of the Oconee Probabilistic Risk Assessment, that the proposed limiting condition for operation of 60 days when an SSF component is declared inoperable to be unacceptable. The NRC requested that Duke adopt an allowable outage time of no longer than seven days rather than the proposed 60 days or propose an alternative LCO if adequate justification can be provided.

The SSF Auxiliary Service Water (ASW) as an assured source of water is not the only means for decay heat removal for all three Oconee units following a seismic event and loss of EFW system. As indicated in the NRC's Safety Evaluation Report (SER) on seismic qualification of the EFW system dated January 14, 1987, the High Pressure Injection (HPI) system and Low Pressure Injection (LPI) system pumps located in Auxiliary Building and protected from flooding will provide an adequate alternative to the EFW system for decay heat removal in the feed-and-bleed mode. In addition, modifications to improve the seismic capability of the EFW system, improved operating procedures, Operator training and the Turbine Building Flood Drain Pipe will further assure the availability of the EFW system following a seismic or flooding event.

Duke is currently preparing alternative Technical Specifications based on a practical approach from an operational and maintenance limitation point of view. New proposed Technical Specifications for SSF with appropriate justification will be submitted by May 15, 1987. The following is a preliminary summary of Duke's approach in preparing and determining alternative LCOs for SSF components.

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Inoperability periods of 45 days will be allowed for such equipment as the SSF Diesel Generator (D/G), SSF Auxiliary Service Water (ASW) Pump and SSF RC Makeup pump. Currently, preventive maintenance of D/G and SSF ASW pump require at least 7 days around the clock work. The preventive maintenance of this equipment, however, can be scheduled to coincide with Unit 2 refueling outages and unwatering of Unit 2 Condenser Cooling Water (CCW) inlet piping (which takes approximately four weeks) to minimize the frequency of 45 days outages. Furthermore, realistic times for various forced outages of the D/G can range from five to twenty days for activities such as oil change or replacing all lower bearings, respectively.

Therefore, from a realistic approach, the 45 days LCO does not appear to be excessive. The proposed technical specifications, however, will require that the 45 days LCO due to inoperability of certain SSF equipment not to exceed once per year without prior NRC approval. The current proposed technical specifications in Duke's letter of July 26, 1986 do not impose this requirement. For all other SSF Instrumentation and SSF Power Systems (Breakers, etc...) Duke intends to propose a seven days LCO which is consistent with the NRC position.

Finally, Duke understands that the NRC intends to issue a Generic Letter in the future for resolution of unresolved issue A-46 concerning the seismic qualification of equipment in operating plants (NUREG-1211). In light of this future Generic Letter, Duke may wish to revisit the Oconee seismic induced flooding concern of the Oconee Turbine Building and adequacy of the seismic capability of plant systems.

If further discussions or questions regarding this issue is desired, please feel free to contact us through the normal Licensing channels.

Very truly yours,

H. B. Tucker /BSJ

Hal B. Tucker

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