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50-269/270/287

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TO:

Mr. Edson G. Case

FROM:

Duke Power Company
Charlotte, North Carolina
William O. Parker, Jr.

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DESCRIPTION

ENCLOSURE

Att. 1) Proposed Overpressure Protection
System Modification-

Att. 2) Electrical Diagrams-

(2-P)

(2-P)+(12-P)

PLANT NAME: Oconee Units 1-2-3
RJL 1/11/78Dist. Per S. Sheppard 1-11-78
Note: LTR ONLY UNLESS NOTED 1 CY ENCL Rec'd

SAFETY

FOR ACTION/INFORMATION

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DUKE POWER COMPANY

POWER BUILDING

422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28242

REGULATORY DOCKET FILE COPY

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

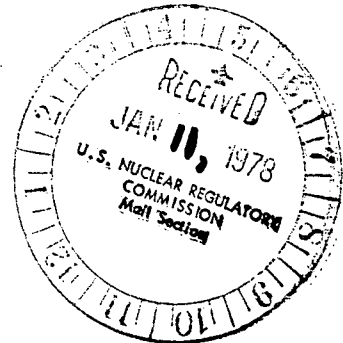
January 4, 1978

TELEPHONE: AREA 704
373-4083

Mr. Edson G. Case, Acting Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. A. Schwencer, Chief
Operating Reactors Branch #1

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



Dear Mr. Case:

Your letter dated November 10, 1977 stated that the overpressure protection system for Oconee Nuclear Station does not meet all the criteria established by the NRC. You requested that we propose system modifications that will provide overpressure protection in full conformance with NRC criteria, and that we provide a value-impact assessment on schedule and cost to make all necessary hardware changes.

In my earlier submittals, the analysis of the overpressure transient caused by the initiation of high pressure injection did not include letdown flow. This flow reduces the total mass addition rate into the reactor coolant system by approximately 60 gpm and increases the time until operator action is required to terminate the overpressurization transient. With an initial system pressure of 100 psig, the time until overpressurization would occur is approximately nine minutes; with an initial pressure of 225 psig, the time is approximately five minutes. While these new times do not meet the arbitrary NRC criteria which does not allow credit for operator intervention for ten minutes, we feel that there is sufficient time for operators to take timely and appropriate action.

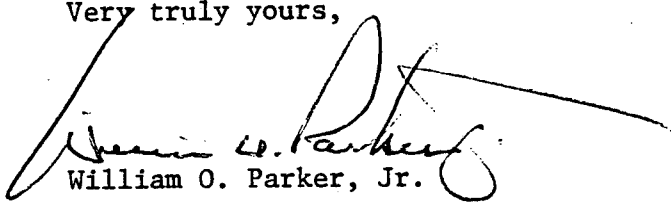
However, in compliance with your request, a proposed overpressure protection system modification, including a cost estimate and implementation schedule is provided in Attachment 1. The letter also requested electrical circuit and logic diagrams which are provided in Attachment 2.

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Mr. Edson G. Case, Acting Director
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January 4, 1978

It continues to be our conclusion that the design and operation of the Oconee Nuclear Station are adequate to mitigate the consequences of a postulated reactor vessel overpressurization incident. In addition, the requirements related to the maintenance of the power operated relief valve and the testing of the high pressure injection valve are more appropriately included in station maintenance procedures than in the Technical Specifications. As such, no proposed Technical Specifications are being submitted.

Very truly yours,



William O. Parker, Jr.

RLG:ge

Attachment