Duke Energy

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W. R. McCollum, Jr.
Vice President

July 1, 2002

U. S. Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555-0001

SUBJECT: Duke Energy Corporation
Oconee Nuclear Station Unit 1
Docket No. 50-269
Response to NRC Position Discussed in NRC Inspection Report 50-269, 270, 287/01-05 Regarding Emergency Feedwater Pump Availability

Duke is in receipt of NRC Inspection Report 50-269, 270, 287/01-05, dated April 29, 2002, which discussed the testing of the Oconee Unit 1B motor-driven emergency feedwater pump (1B MDEFW) on April 25, 2001. Elevated outboard bearing temperatures were observed during that test. This inspection report presented a position that the associated engineering analysis did not provide an adequate basis to demonstrate that the 1B MDEFW pump was functional while in this degraded condition. Consequently, the inspection report stated that the hours back to the previous surveillance should be added as unavailable time for the associated Oconee Unit 1 Performance Indicators. The performance deficiency for this finding was assessed using the Significance Determination Process; a licensee identified violation of very low safety significance (i.e. green) was discussed in NRC Inspection Report 50-269, 270, 287/01-02, dated July 30, 2001.

Duke respectfully disagrees with the conclusions presented in the NRC Inspection Report 01-05. The 1B MDEFW pump test was conservatively terminated upon discovery of the elevated bearing temperature and a subsequent operability evaluation was conducted in accordance with the provisions of Generic Letter 91-18. Engineering judgment was a necessary element of the evaluation since the surveillance test was terminated prior to establishing an equilibrium bearing temperature. However, extensive engineering evaluation of the available data concluded that although the motor bearing was degraded, it would have performed its specified safety function. This conclusion was validated via an independent assessment conducted by an industry bearing expert. Therefore, the Oconee Performance Indicator data for unavailable hours remains correct to the best of

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Duke's knowledge. However, in the interest of reflecting the NRC's views on this issue, the Oconee Performance Indicator data will contain a footnote to indicate the position taken by the NRC as reflected in Inspection Report 01-05.

Inquiries on this matter should be directed to Larry E. Nicholson at (864) 885-3292.

Very Truly Yours,

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xc:

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