



Duke Energy

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Vice President

July 11, 2002

U. S. Nuclear Regulatory Commission
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Subject: Oconee Nuclear Station - Units 1, 2 and 3
Docket Nos. 50-269, 50-270, 50-2887
Unsolicited Response to NRC Preliminary White
Finding

Duke Energy Corporation (Duke) is in receipt of the referenced NRC preliminary white finding letter¹ and SDP Phase III Summary attachment, dated April 8, 2002. The subject letter describes one apparent violation of Technical Specification 5.4.1 concerning the related procedural inadequacy of Abnormal Procedure AP/1,2,3/A/1700/26, Loss of Decay Heat Removal, Revision 10. Specifically, the apparent violation states the above procedure lacked sufficient instructions to ensure that operators would direct closure of the containment emergency hatch door upon a loss of decay heat removal. The purpose of this response is to inform the NRC that the procedure has been revised and to provide additional perspective for consideration.

Duke acknowledges the finding and, as stated in the NRC letter, the procedural deficiency was corrected within one month from the issuance of the inspection report. Also, as stated in the referenced preliminary white finding letter, this finding does not represent a current safety concern.

The finding was based on a procedural inadequacy in regard to a postulated loss of decay heat removal event.

¹ NRC letter to Duke Energy Corporation, (Attn: W. R. McCollum), "Oconee Nuclear Station - NRC Inspection Report 50-269/00-07, 50-270/00-07, 50-269/00-07; Preliminary White Finding" dated April 8, 2002.

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Specifically, AP/1,2,3/A/1700/26, provided direction which could have been interpreted as not requiring containment equipment hatch closure following a loss of decay heat removal. This was reflected in the NRC's white finding letter which stated that discussions with a "number of operators" led the NRC to conclude that the operators would have relied on the temporary hatch cover to satisfy containment closure requirements. It is important to note that Duke's own discussions indicated that most operators, given a loss of decay heat removal situation, would have closed the equipment hatch door. Notwithstanding, Duke agrees that procedure enhancements were warranted to ensure that this action would be performed consistently by all operators. As stated previously, this procedure has been revised to provide clearer guidance.

As stated in the NRC SDP Phase III Summary, the event scenario would be expected to develop rather slowly, in the order of several hours. Within this extended time frame, the Technical Support Center (TSC) would have been activated based on the loss of decay heat removal and would have been monitoring the status of each fission product boundary. Duke is confident that the TSC would have directed actions to ensure containment closure using the emergency hatch door. Although there is apparently no provision within the NRC SDP process to consider this response, this TSC action would have ensured appropriate containment closure prior to any significant radiological release.

In conclusion, Duke does not agree that the emergency hatch door would remain open during an actual event based on the extended time frame available for mitigation and the additional TSC resources.

U. S. Nuclear Regulatory Commission
July 11, 2002 / Page 3

If you have any questions or require additional information, please contact Noel Clarkson, Oconee Regulatory Compliance Group at 864-885-3077.

Very truly yours,



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