



RONALD A JONES
Vice President
Oconee Nuclear Site

Duke Power
ON01VP / 7800 Rochester Hwy.
Seneca, SC 29672

864 885 3158
864 885 3564 fax

September 15, 2005

U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Document Control Desk

Subject: RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
REGARDING LICENSE AMENDMENT REQUEST ASSOCIATED
WITH NEW REACTOR BUILDING EMERGENCY SUMP (RBES)
STRAINERS
Oconee Nuclear Station Units 1,2,&3
Docket Numbers 50-269, 270, and 287

By letter dated August 18, 2005, Duke Energy Corporation submitted a License Amendment Request proposing to amend Appendix A, Technical Specifications (TS), for Renewed Facility Operating Licenses DPR-38, DPR-47, and DPR-55 for Oconee Nuclear Station (ONS) Units 1,2, and 3. The proposed change to Technical Specification Surveillance Requirement (SR) 3.5.2.6 and SR 3.5.3.6 is needed to reflect the replacement of Reactor Building Emergency Sump (RBES) suction inlet trash racks and screens with strainers in response to Generic Letter 2004-02.

On September 9, 2005, ONS received a Request for Additional Information by electronic mail. The RAI consists of three questions related to the TS Change Request. The response to those questions is included as Attachment 1 to this letter.

If you have further questions or need additional information, please contact Russ Oakley at (864) 885-3829.

Very truly yours,

R. A. Jones, Vice President
Oconee Nuclear Site

A001

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xc w/Attachment:

W. D. Travers
U. S. Nuclear Regulatory Commission
Regional Administrator, Region II
Atlanta Federal Center
61 Forsyth St., SW, Suite 23T85
Atlanta, GA 30303

L. N. Olshan (Addressee Only)
NRC Senior Project Manager (ONS)
U. S. Nuclear Regulatory Commission
Mail Stop O-8 H12
Washington, DC 20555-0001

M. E. Shannon
Senior Resident Inspector (ONS)
U. S. Nuclear Regulatory Commission
Oconee Nuclear Site

Henry Porter
Division of Radioactive Waster Management
South Carolina Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

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bxc w/Attachment:

R. L. Gill - NAID
L. A. Keller - CNS
C. J. Thomas - MNS
B. G. Davenport
R. L. Oakley
R. J. Freudenberger
S. D. Capps
L. J. Azzarello
Lisa F. Vaughn
Paul M. Stovall
David B. Coyle
T. P. Gillespie
Robert L. Medlin
NSRB, EC05N

NRIA File/ELL EC05O
Oconee Master File - ON03DM (File T. S. Working)

I affirm that I, R. A. Jones, Vice President, Oconee Nuclear Station, Duke Energy Corporation, am the person who subscribed my name to the foregoing, and that all the matters and facts herein are true and correct to the best of my knowledge.



R. A. Jones, Vice President
Oconee Nuclear Station

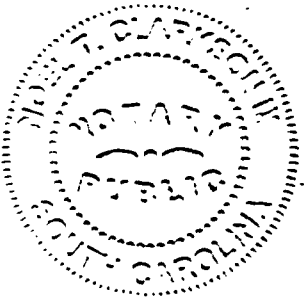
Subscribed and sworn to before me this 15th day of September, 2005.



Notary Public

My commission expires:

9-20-2009



ATTACHMENT 1

RAIs for Sump Strainer Technical Specification Change

RAIs for Sump Strainer Technical Specification Change

- 1. The change requested replaces the term "trash racks and screens" with the term "strainers". Attachment 3 states, "The new term "strainers" is also appropriate for the existing design that uses trash racks and screens to strain debris from the suction inlet." For those plants not being modified, how is the licensee going to ensure that the definition of the term "strainers" will include both the existing trash racks and screens?**

The use of the term "strainers" in place of "trash racks and screens" is relevant only to the surveillance, which requires the sump strainers to be inspected for evidence of structural distress or abnormal corrosion. The term "strainer", being more generic, encompasses all straining elements of the structure. For the existing sumps (units not modified), the term "strainer" would encompass the surrounding grating (trash rack), the screen mesh, and the fit between these elements and supporting members of the structure. For new (modified) sumps, the term "strainer" would apply to the perforated plate which performs the straining function and the fit between this plate and all supporting members. Inspection procedures (applicable to all 3 units) are being revised to use the generic term and clarify inspection requirements.

- 2. Attachment 4 provides information indicating that the new strainer design has been evaluated for missiles, jet impingement, and structural distress due to debris. The evaluation does not mention seismic considerations in any way. Was a seismic evaluation performed? What did it include?**

Seismic loading (Maximum Hypothetical Earthquake) was included in the structural analysis for the modified sump. This was one of several loads considered, including dead weight, live loads, differential pressure, and thermal loads.

- 3. Attachment 4 states that the strainer was evaluated against jet impingement from HELB and missile impact. No evaluation of pipe whip has been noted in the evaluation. The staff would like to review the evaluation conducted for jet impingement, missile impact, and any evaluation of pipe whip that the licensee may have conducted.**

The evaluations for jet impingement and pipe whip effects (S-003) and for missile protection (S-002) were provided in electronic format to the NRC staff via electronic mail on September 15, 2005.