Duke Energy®

BRUCE H HAMILTON
Vice President
Oconee Nuclear Station

Duke Energy Corporation
ON01VP / 7800 Rochester Highway
Seneca, SC 29672

864 885 3487
864 885 4208 fax
bhhamilton@duke-energy.com

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U. S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

Subject: Duke Power Company LLC d/b/a Duke Energy Carolinas, LLC (Duke)
Oconee Nuclear Station, Unit 2
Docket No. 50-270
Steam Generator Inservice Inspection 2EOC21
3 Month Report

Gentlemen:

On May 14, 2007, Oconee Nuclear Station notified NRC Region II staff, by telephone, of a case where information supplied to the NRC was not accurate in all material respects. On May 15, 2007, a letter was provided to Dr. William D. Travers, Administrator, Region II, pursuant to 10 CFR 50.9 Sections (a) and (b), to further document the erroneous information.

Specifically, Duke submitted the Unit 2 End of Cycle 21 (2EOC21) Steam Generator Inservice Inspection 3 Month Report by letter dated February 23, 2006 (ML060600449). In Enclosure A of that report, Duke indicated that 15,630 tubes had been inspected on the 2B Steam Generator. Enclosure B indicated that 100% of the Steam Generator tubes (a total of 31,257 tubes between the 2A and 2B Steam Generators) had been inspected. It was discovered that these numbers were in error, as documented in Oconee Problem Identification Process (PIP) 07-2685, initiated May 13, 2007.

During the Steam Generator Inservice Inspection for the 2EOC22 Unit 2 outage, discrepancies were noted between current and past inspection data. Resolution of the discrepancies led to the discovery that an AREVA technician had mis-aligned the inspection equipment during part of the 2EOC21 inspections on the 2B Steam Generator. This error resulted in 53 tubes being inspected under incorrect location designations and 33 tubes not being inspected at all because other tubes were inspected instead. The submitted 2EOC21 Inservice Inspection report credited the inspection results to the tubes intended for inspection since the error was not discovered until the next outage.

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In the May 15, 2007 letter, Duke committed to submit additional information to correct or clarify the 2EOC21 3 Month Report. This letter is intended to meet that commitment.

Since 33 tubes were not inspected as a result of this error, the percentage of Steam Generator tubes actually inspected was 99.79% for 2B Steam Generator and 99.89% total for both steam generators, rather than 100% as indicated in Enclosure B of the report. Attached are two tables listing tubes that were misidentified during the 2B Steam Generator examination during the Oconee Unit 2 EOC21 (October 2005) refueling outage. Table 1 lists the 53 affected tubes by their location coordinates, and indicates which of the affected tubes were actually inspected and which were not. Table 2 lists the 33 tubes which did not receive an inspection during EOC21 and the depth of any wear that exists based on the EOC22 (May 2007) inspection results; the deepest being 17% through-wall.

Please address any questions to Randall P. Todd at (864) 885-3418.

Very truly yours,

Bruce H. Hamilton, Vice President
Oconee Nuclear Site

Attachment

cc: Dr. William D. Travers
Administrator, Region II
U.S. Nuclear Regulatory Commission
Atlanta Federal Center
61 Forsyth St., SWW, Suite 23T85
Atlanta, GA 30303

Mr. L. N. Olshan
Project Manager
U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, D.C. 20555

Mr. D. W. Rich
NRC Senior Resident Inspector
Oconee Nuclear Station

bxc:

B.G. Davenport
R.L. Gill
E.B. Kulesa
Parker Downing, Jr.
J. D. Gilreath
G.L. Brouette (ANII)
L.F. Vaughn
S.J. Magee (WOE)
Document Control (Master File)
ELL
PIP FILE

CNS:
H.D. Brewer
R.D. Hart
MNS:
J.A. Kammer
K.L. Ashe

Table 1 2B SG Misidentified Tube Locations and Test Status

Count	2005 Encode	2005 Actual	Tested	Count	2005 Encode	2005 Actual	Tested
1	141-47	140-49	Y	28	142-39	141-41	N
2	141-48	140-50	Y	29	142-40	141-42	N
3	141-49	140-51	Y	30	142-41	141-43	N
4	141-50	140-52	Y	31	142-42	141-44	N
5	141-51	140-53	Y	32	142-43	141-45	N
6	141-52	140-54	Y	33	142-44	141-46	N
7	141-53	140-55	Y	34	142-45	141-47	N
8	141-54	140-56	Y	35	142-46	141-48	N
9	141-55	140-57	Y	36	142-47	141-49	N
10	141-56	140-58	Y	37	142-48	141-50	N
11	141-57	140-59	Y	38	142-49	141-51	N
12	141-58	140-60	N	39	142-50	141-52	N
13	141-59	140-61	Y	40	142-51	141-53	N
14	141-60	140-62	Y	41	142-52	141-54	N
15	141-61	140-63	Y	42	142-53	141-55	N
16	141-62	140-64	Y	43	142-54	141-56	N
17	141-63	140-65	Y	44	142-55	141-57	N
18	141-64	140-66	Y	45	142-57	141-59	N
19	141-65	140-67	Y	46	142-58	141-60	N
20	141-66	140-68	Y	47	142-59	141-61	N
21	141-67	140-69	Y	48	142-60	141-62	N
22	141-68	140-70	N	49	142-61	141-63	N
23	142-34	141-36	N	50	142-62	141-64	N
24	142-35	141-37	N	51	142-63	141-65	N
25	142-36	141-38	N	52	142-64	141-66	N
26	142-37	141-39	N	53	142-65	141-67	N
27	142-38	141-40	N				

"Count" column assigns an item number to each mis-alignment.

"2005 Encode" column indicates the tube coordinates (Row# and tube# within that row) as indicated in 2005 report. This is the location we intended to inspect.

"Actual" indicates the tube coordinates (row# and tube#) actually inspected.

"Tested" column indicates if the intended tube was tested "unintentionally" by another mis-alignment. For example, note that "count" 34 indicates that the tube actually inspected (141-47) was the tube intended to be inspected by "count" 1.

Table 2 2B SG Tube Wear in 2007 for Tubes NOT Inspected in 2005

Count	Tube Identification	2007 % TW	Count	Tube Identification	2007 % TW
1	141-58	13 / 14	18	142-49	NDD
2	141-68	NDD	19	142-50	6 / 7
3	142-34	NDD	20	142-51	NDD
4	142-35	NDD	21	142-52	NDD
5	142-36	NDD	22	142-53	10
6	142-37	NDD	23	142-54	8 / 10
7	142-38	NDD	24	142-55	6 / 11
8	142-39	NDD	25	142-57	17
9	142-40	NDD	26	142-58	NDD
10	142-41	6	27	142-59	NDD
11	142-42	14	28	142-60	8 / 14
12	142-43	7 / 11	29	142-61	NDD
13	142-44	4 / 5	30	142-62	6
14	142-45	4	31	142-63	NDD
15	142-46	5 / 15	32	142-64	5
16	142-47	NDD	33	142-65	NDD
17	142-48	NDD			

% TW = Percent through-wall

NDD = No Detectable Degradation

Dual Values (e.g. 4 / 5) indicate that two defects were observed in that tube.