



Duke Energy Corporation

Oconee Nuclear Station

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W. R. McCollum, Jr.
Vice President

February 18, 1999

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

SUBJECT: Duke Energy Corporation
Docket No(s) . 50-269, -270, -287
Oconee Nuclear Station Units 1, 2, and 3
Correction of NRC SER dated August 11, 1978

Via this submittal, Duke Energy Corporation (Duke) is correcting a statement contained in a Nuclear Regulatory Commission (NRC) Safety Evaluation Report (SER) dated August 11, 1978. Section 5.3.1 of the SER states: "The safety-related equipment at elevation 838 feet in the Auxiliary Building includes the spent fuel pools and associated fuel handling equipment." This statement is not consistent with Oconee's licensing basis. Duke reviewed the associated correspondence, but was unable to identify a source for the incorrect information.

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There is no licensing basis requirement for the spent fuel pools or the associated fuel handling equipment to be QA-1. Duke has chosen to apply QA-1 requirements to the spent fuel pools, because they are Class 1 structures and the suction source for the Standby Shutdown Facility reactor coolant emergency makeup system.

On April 12, 1995, Duke provided the NRC with a detailed description of the history of the Oconee's QA-1 licensing basis. Additionally, in Attachment 3 of the submittal, Duke provided the general criteria used to determine if a structure, system, or component is QA-1. The general design criteria were divided into two categories. These categories were: 1) original Oconee QA-1 Licensing Basis; and 2) Oconee

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QA-1 structures, systems, and components added to the original licensing basis.

On August 3, 1995, the NRC issued an SER regarding Duke's submittal dated April 12, 1995. The NRC provided the following summary in the SER:

"In our examination of the FSAR and other references we did not find any basis to contradict the DPC assertion that the only DBA for ONS is the LBLOCA/LOOP for delineation of equipment to be defined as safety-related QA-1.

"DPC provided criteria for properly selecting the systems related to the LBLOCA/LOOP DBA for the QA-1 quality category. Some additional SSCs are in the process of being added to the original licensing basis by DPC's voluntary OSRD Project. Other SSCs are being put into DPC's voluntary Augmented Quality Assurance program for upgrade. The staff agrees that these steps provide an adequate approach for safety classification. If properly implemented the augmented QA program should help ensure that SSCs important to safety will receive the appropriate operation, maintenance and testing. The augmented QA program should provide enhancement to assure that equipment important to the mitigation of accidents and transients will perform their intended function.

"In our review of Attachment 3, Supplemental Response to Subpart 1 of Section 2.2.1 of GL 83-28, we found the criterion to be acceptable for SSCs of the first category. This acceptance of the proposed classification of the SSCs in the supplemental response to GL 83-28 is based on the condition that no previous SSCs that were classified as QA-1 be downgraded in classification. The evaluation of the criterion for the review of the SSCs in the second category was also found to be acceptable. DPC indicated that a list of QA-1 SSCs from the OSRD Project for the second category is scheduled for completion by July 10, 1995. Upon completion of this list, a supplement to Attachment 3 is to be submitted to NRC."

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Duke submitted additional information regarding the second category of general criteria on July 10, 1995, August 25, 1995, and May 6, 1996. Subsequently, this information was incorporated into the Updated Final Safety Analysis Report.

The documents discussed above provide Oconee's Licensing Basis for establishing QA-1 (i.e., safety related) structures, systems, and components. The spent fuel pools and the associated fuel handling equipment are not identified as QA-1 in any of these documents.

Inquiries on this matter should be directed to J. E. Burchfield, Jr. at (864) 885-3292.

Very truly yours,



W. R. McCollum, Jr., Site Vice President
Oconee Nuclear Site

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xc w/attachments:

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