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SUBJECT: Forwards revised copy of relief request ON-SRP-LPI-06, which is intended to replace & supercede previous relief request, submitted 990526 re partial flow testing of one low pressure injection pump per unit during quarterly pump testing.

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August 26, 1999

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Subject: Duke Energy Company
Oconee Nuclear Station
Docket No. 50-269, -270, -287
Third Ten-Year Inservice Inspection Interval
Inservice Testing Program, Revision 25

Pursuant to 10CFR 50.55a, Duke Energy Company (Duke) has previously submitted documentation of the Inservice Testing Program for the Third Ten-Year Inservice Inspection Interval at Oconee Nuclear Station. On May 26, 1999, Duke transmitted Revision 25, which replaced Revision 24 in its entirety.

Section 5.2 of Revision 25 contains relief request ON-SRP-LPI-06, which addresses partial flow testing of one Low Pressure Injection Pump per unit during quarterly pump testing. On August 24, 1999, a telephone call was held between site personnel and NRC Staff to address questions that had arisen during the Staff's review of relief request ON-SRP-LPI-06. As a result of these questions, Duke recognized a need to clarify the relief request. Therefore, attached is a revised copy of relief request ON-SRP-LPI-06, which is intended to replace and supercede the previous relief request.

The new revision better clarifies a) the specific paragraph of IWP for which relief is being requested and b) the fact that full flow testing is performed during refueling outages.

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U. S. Nuclear Regulatory Commission
August 26, 1999
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If there are any questions or if additional information is needed, you may contact R. P. Todd at (864) 885-3418.

Very truly yours,

W. R. McCollum, Jr. for WRM

W. R. McCollum, Jr.
Site Vice President

Attachments

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Oconee Units 1, 2, and 3

Pump Specific Relief Request

Item Number: ON-SRP-LPI-06

Pump(s): Low Pressure Injection Pumps
1A, 2A, and 3A
(Not applicable to 1B, 1C; 2B, 2C; and 3B, 3C LPI Pumps)

Flow Diagram: OFD-102A-1.2, OFD-102A-2.2, OFD-102A-3.2

ISI Class / Duke Class: B/B

Function: Provide emergency core cooling flow from the BWST Directly to the Reactor Vessel in the event of a large break LOCA. Provide NPSH for the HPI pumps in piggyback alignment for small break LOCA's. Provide long term post-accident sump recirculation cooling.

Test Requirement: Per IWP-3100, the resistance of the system shall be varied until the flow rate equals the reference value. The pressure shall then be determined and compared to its reference value. Alternatively, the flow rate can be varied until the pressure equals the reference value and the flow rate shall be determined and compared to the reference flow rate value.

Basis for Relief: The 1A, 2A, and 3A Low Pressure Injection (LPI) pumps are tested during power operation through a recirculation flow path to the Borated Water Storage Tank (BWST). The "A" pump for each unit can only be tested using a line-up, which contains a section of 3 inch pipe. Other flow alignments are physically possible, but are prohibited by our Technical Specifications due to the necessity of having both trains of the system inoperable simultaneously. From past test data, the recirculation line of the A train pumps is only capable of passing approximately 1200 gpm. Due to a smaller recirculation line on the A train, it is not desirable to throttle these pumps below this point. During the performance testing, the system resistance is not varied and all valves in the flow path are full open; however, the flow is specified as the fixed parameter and the differential pressure is examined for degradation. Examining past performance data, the flow rate during the pump performance testing varies ± 6 percent from the fixed reference flow. From examination of the manufacturer's pump curve for the 1A, 2A, and 3A LPI pumps, the developed head is constant between 500 and 1300 gpm. Thus, the acceptance range for the differential pressure is unaffected by variations in the pump flow rate between 500 and 1300 gpm. Therefore, a tolerance of ± 6 percent of the reference flow is acceptable as long as the allowable flow range remains between 500 and 1300 gpm.

Test Alternative: During quarterly testing at power operation, the 1A, 2A, and 3A Low Pressure Injection Pumps will be tested at less than required accident flows. A tolerance of ± 6 percent of the reference flow will be allowed as described above. During refueling outages, the 1A, 2A, and 3A Low Pressure Injection Pumps will be tested per the requirements of the ONS Inservice Test Program at the accident design flow rate.