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 50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287
 50-369 William B. McGuire Nuclear Station, Unit 1, Duke Powe 05000369
 50-370 William B. McGuire Nuclear Station, Unit 2, Duke Powe 05000370
 50-413 Catawba Nuclear Station, Unit 1, Duke Power Co. 05000413
 50-414 Catawba Nuclear Station, Unit 2, Duke Power Co. 05000414

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 RECIP. NAME RECIP. NAME Document Control Branch (Document Control Desk)

SUBJECT: Responds to IE Bulletin 88-004, "Potential Safety-Related Pump Loss Schedule for Response."

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Duke Power Company
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DUKE POWER

April 21, 1989

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: McGuire Nuclear Station
Catawba Nuclear Station
Oconee Nuclear Station
Docket Nos. 50-369, -370; 50-413, -414; and 50-269, -270, -287
NRC Bulletin No. 88-04
Potential Safety-Related Pump Loss
Schedule For Response

Gentlemen:

NRC Bulletin No. 88-04 concerning potential safety related pump loss was issued May 5, 1988. This bulletin requested investigation and correction, as applicable, of two miniflow design concerns. My letter of July 11, 1988 in initial response to the bulletin for the McGuire, Catawba, and Oconee Nuclear Stations stated that while Duke's review of the bulletin was well underway, we were not able to provide the requested response on individual pumps at that time (since needed information requested from manufacturers had not been received, etc.), and that Duke would provide a further status of progress on August 31, 1988 including any final bulletin responses for specific pumps. The August 31, 1988 submittal contained an interim response/schedule and indicated that a status update on the progress of activities that remain to be completed before a final Bulletin action No. 4 response can be made for a station(s) would be provided by December 1, 1988. Our December 1, 1988 letter provided that status update, with a further status update scheduled for June 30, 1989.

Subsequently, based on an NRC concern raised at the January 12, 1989 Duke/NRC Interface Meeting, a Teleconference between NRC (D. S. Hood, et.al.) and Duke (P. B. Nardoci, et.al.) was held February 7, 1989, during which Duke's response schedule was discussed. The NRC primarily wanted to discuss our work process on the bulletin. It appears other utilities are responding quicker than Duke. From the discussion it was clear that some utilities have only compared their minimum flow capability to initial pump manufacturer requirements. While we have already done that, we are now developing data so manufacturers can evaluate minimum flow requirements based on current technology (i.e. fluid temperature, internal recirculation flow). After the call, Duke felt good about how we were approaching the Bulletin response, and that the NRC's concerns were alleviated. However, by letter dated March 22, 1989, the NRC questioned Duke's perception of the significance of the concerns addressed in the Bulletin and the management attention and resources directed toward completion of the effort, and directed Duke to provide a detailed schedule for expedited completion.

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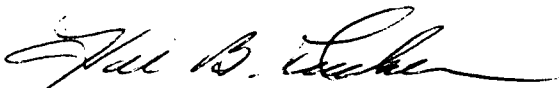
Since this was a significant departure from the feelings and understanding NRC conveyed in the February 7, 1989 Telecon, R. L. Gill (DPC) discussed this matter with Mr. D. B. Matthews (NRC/ONRR) et.al. in a Telecon on March 31, 1989. Mr. Gill advised Mr. Matthews that Duke was in agreement with the safety-significance of the issue and would be making a detailed submittal by June 30, 1989 (both points noted in the March 22, 1989 NRC letter), but that we were particularly concerned with the language of the second sentence of the third paragraph of the March 22nd letter in view of the February 7th telecon. In that telecon the NRC seemed to understand what Duke was doing and why, and in fact had already accomplished what many other utilities had submitted, and that Duke was appropriately doing more analysis to be responsive to the bulletin which caused the schedule to be extended. This work in our opinion is fully consistent with our understanding of the requirements of the bulletin. The statement in the NRC letter conveys the clear impression that NRC does not have the information necessary to support the Duke schedule, and that with "sufficient management attention and resources" the effort should be completed on a faster schedule. The discussion with Mr. Matthews revealed that what the NRC really wanted was for Duke to put a letter on the docket conveying the same information that had been conveyed during the February 7th telecon. Mr. Gill committed to providing such a letter, and indicated that we felt the March 22, 1989 letter did not accurately reflect the current understandings between Duke and NRC and that we wanted to put that information on the docket also.

Accordingly, this letter constitutes the requested information and documentation of Duke's position. The basis for Duke Power Company's schedule on bulletin 88-04 is attached, explaining the process we've used to respond to the bulletin and what is left to be done. Duke will also adhere to the guidance in NRC Generic Letter No. 89-04 that relate to this bulletin.

We regret any confusion that may have existed over this matter. Should the NRC Staff continue to have concerns/questions or if additional information is required, please advise. If not, Duke assumes that the schedule/process outlined in this letter is acceptable to the NRC.

I declare under penalty of perjury that the statements set forth herein are true and correct to the best of my knowledge.

Very truly yours,



Hal B. Tucker

Attachment

PBN163/lcs

U. S. Nuclear Regulatory Commission
Page Three
April 21, 1989

xc: (w/attachment)

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Oconee Nuclear Station

Basis for Duke Power Company's Schedule on Bulletin 88-04

Process

- Following receipt of the bulletin (May 1988) Duke identified the pumps applicable to the bulletin.
- Duke gathered all available information concerning each pump that might help in responding to the bulletin. This information came from manufacturer minimum flow requirements provided when pumps were purchased (if available), applicable testing done by the manufacturer or the station and any analytical models developed for the pumps.
- Duke requested reevaluation by pump manufacturers of pump minimum flow requirements based on current technology (i.e., fluid temperature, internal recirculation flow), as required by the bulletin.
- Duke provided an interim response to the bulletin on August 31, 1988. (Duke had asked for an extension of timeframe to provide initial response on July 11, 1988). The interim response identified actions taken to date by Duke, responses from manufacturers to date and future action to be taken. In addition a sheet was provided for each applicable pump identifying the pump's minimum flow configuration, a justification for continued operation based on known information and a list of further actions to be taken. [Please note that the Catawba containment spray (NS) pumps were incorrectly identified as being manufactured by Ingersoll-Rand in the August 31st submittal; they are actually Bingham pumps as indicated in the July 13, 1988 submittal]. In a February 7, 1989 teleconference with the NRC it appeared to Duke Power Company personnel present that the NRC was telling us other utilities were making final bulletin responses based on information similar to our August 31, 1988 interim response. We are going beyond the interim response to get a reevaluation by pump manufacturers, as required by the bulletin.
- Duke provided a status update to the NRC on December 1, 1988.

Remaining Actions

- Remaining information requested by pump manufacturers in order for them to reevaluate pump minimum flow requirements will be provided by June 1, 1989. In some cases developing this information required modeling an entire system. The remaining pumps include the following (all manufactured by Ingersoll-Rand; we have received responses from all other pump manufacturers):

<u>Oconee</u>	<u>McGuire</u>	<u>Catawba</u>
Low Pressure Injection	Residential Heat Removal	Residential Heat Removal
High Pressure Injection	Containment Spray	
Reactor Building Spray		
Auxiliary Service Water		
Low Pressure Service Water		
SSF HVAC Cooling Water		
SSF Diesel Engine Cooling Water		

- Ingersoll-Rand(IR) will be asked to provide a schedule for returning their reevaluated minimum flow requirements. IR's previous estimate was that their response could take several weeks to several months. Following IR's response Duke will evaluate pump performance versus manufacturer requirements in order to determine the course of action leading to a final bulletin response (each pump will be evaluated for any needed procedural or hardware changes, which could involve the need for field testing and runs on analytical models).
- A status update will be provided to the NRC by June 30, 1989. Duke will identify the items still outstanding for inclusion in the update. Final bulletin responses are anticipated for some of the pumps with manufacturer reevaluations of pump minimum flow requirements already received (those other than IR pumps). A schedule for final bulletin responses will be provided for any of these pumps not having a final response in the June 30, 1989 status update (completion of needed testing, analytical models and scheduling of needed procedural or hardware changes may not be completed by June 30, 1989). The latest status information on IR pumps will also be provided.