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ACCESSION NBR: 9305110288      DOC. DATE: 93/04/29      NOTARIZED: NO      DOCKET #  
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50-270 Oconee Nuclear Station, Unit 2, Duke Power Co.      05000270  
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SUBJECT: Forwards list of commitments to address 921019 loss of offsite power event at Unit 2. Plans for testing overhead emergency power path submitted to NRC on 930415. Submittal of test plan procedure planned on 930522.      D  
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**DUKE POWER**

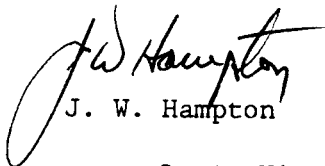
April 29, 1993

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

Subject: Oconee Nuclear Station  
Docket Nos. 50-269,-270,-287  
Corrective Action for October 19, 1992 Loss of Offsite Power

On March 29, 1993 a management meeting was held regarding the Oconee Unit 2 loss of offsite power which occurred on October 19, 1992. As discussed at this meeting, Attachment 1 to this letter provides a summary of commitments resulting from the event. The status of these commitments will be updated on a quarterly basis. The plans for testing of the overhead emergency power path were submitted for NRC review on April 15, 1993, the final version of the test procedure will be submitted as soon as it is available. Currently, the test is planned for May 22, 1993. Attachment 2 provides a copy of Sections I through V of the Oconee Emergency Power Management Plan for your information. Note that this plan is a living document and will be rolled into the System Engineering Program as it is implemented.

Very Truly Yours,

  
J. W. Hampton

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ATTACHMENT 1

Commitments from October 19, 1992 Event

Commitments from October 19, 1992 Event

Schedule

Evaluation of NRC communications applicable to Keowee with schedule for resolution 1/31/94

Switchyard Equipment, Design and Testing Commitments:

Switchyard battery charger testing	October 1993 (contingent on repair of SY-2 charger)
Switchyard breaker failure relay modifications	Completed prior to Oconee 2 restart
Switchyard synchroscope repair	Completed 2/24/93, Tested 3/16/93
Overhead emergency power path integrated test	Oconee Unit 2 refueling outage (May/June 1993)

Keowee Auxiliary Power System Equipment, Design, and Testing Commitments:

Westinghouse DB breaker modifications to provide electrical anti-pump logic	Completed July 1992 (Keowee Unit 1) Completed November 1992 (Keowee Unit 2)
Westinghouse DB breaker modifications to add time delay in breaker closing circuit (allows closing with reduced DC voltage)	Completed December 1992
MG-6 relay review for repair and PM program	July 1993 (Keowee) Next refueling outage (Oconee Units)
MG-6 relay replacement in Keowee auxiliary transfer circuits	July 8, 1993
Keowee auxiliary bus transfer logic modification	July 8, 1993
Keowee auxiliary bus transfer logic timing circuitry testing	August 8, 1993
Keowee black start test	Completed December 1992

Keowee Unit Protection Equipment, Design and Testing Commitments:

Schedule:

Trip function on low voltage at main step-up transformer modification not to affect operating Keowee Unit	Completed November 2, 1992
Deletion of speed switch from field circuits	Completed July 1992 (Keowee Unit 1) Completed November 1992 (Keowee Unit 2)
Keowee load rejection test while aligned to grid	Completed October 25, 1992
Keowee zone relay protection single failure vulnerability	December 1994 (currently administratively controlled)
Keowee overspeed switch setpoint revision	May 1993

Other Keowee support items Equipment, Design and Testing Commitments:

Keowee computer typer connection to computer power supply inverter	Completed prior to Oconee 2 restart
Keowee statalarm modification to power from uninterruptible source	Completed January 29, 1993
Events recorder replacement	
- Switchyard	December 1993
- Keowee	December 1994
- Oconee	October 1994
Review of IEB 79-27 related power supplies	Completed January 28, 1993

Communications Equipment:

Facility telephone system cable and battery backup	Completed March 1993
Base radio system from Keowee control room to Oconee control room	Completed November 1992
Hand held radios capable of transmitting from the Keowee generator floor to the Oconee control room	Completed November 1992

Keowee Operator Training Upgrade Plan

Schedule:

Keowee personnel training on requirements of Operations Management Procedures	Completed November 1992
Task qualification of Keowee operators to all Keowee operating, testing and maintenance procedures	Completed November 1992
Job and Task Analysis (assessment of required knowledge level)	June, 1993
Lesson plan development	August, 1993
Individual operator knowledge and skills assessment and upgrade	December, 1993

Keowee Emergency Response Procedure

"Emergency Start Actuated" indicating light added to Keowee control boards.	Completed October 1992
Keowee EOP	Completed October 1992

Keowee Emergency Response Training

Job Performance Measures (JPMs) developed to verify all possible failure scenarios	November 1992
All Keowee personnel trained and qualified to all 5 JPMs	November 1992
Oconee licensed operators given walk-through training on these JPMs	Since October 1992
Refresher training for Oconee operators to perform remote startup and operation of Keowee from the Oconee control room	August 1993
All Oconee shift operators (licensed and non-licensed) to be qualified to all Keowee auxiliary power JPMs	August 1993

Oconee Loss of Offsite Power Procedure

Schedule:

Revised to include all steps necessary to recover offsite power to Oconee      Completed December 1992

Revised to include both dead bus and live bus transfer options      Completed December 1992

Live bus transfer functionally tested and verified      Completed March 1993

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ATTACHMENT 2

Oconee Emergency Power Management Plan



OCONEE EMERGENCY POWER MANAGEMENT PLAN

TABLE OF CONTENTS

- I. Introduction and Scope
- II. Conduct of Operations
- III. Training
- IV. Maintenance Program
- V. Engineering Program
- VI. Status / Schedules (Not Attached)
  - A. Operations Schedule
  - B. Training Schedule
  - C. Maintenance Schedule
    - C-1 Maintenance Program
    - C-2 Maintenance Equipment
  - D. Engineering Schedule
    - D-1 Engineering Program
    - D-2 Engineering Equipment

OCONEE NUCLEAR STATION  
EMERGENCY POWER MANAGEMENT PLAN

Section I  
INTRODUCTION AND SCOPE

The purpose of this document is to summarize the management expectations for operating and maintaining Oconee's Emergency Power Supply. The standards set forth in this document represent goals which we should continuously strive to meet, and the method to be utilized in obtaining them. It is expected that management personnel at all levels, who are involved in the operation, maintenance, design and modification of Oconee's emergency power supply understand the management expectations included in this plan. Conditions may arise where it will be necessary and prudent to vary from these standards and schedules. The expectation is, however, that through management awareness and involvement, priority attention will be directed to such times and their impact on safety.

Emergency Power at Oconee is supplied from the Keowee Hydro Station which is a two unit hydro-electric generation station that utilizes the impoundment of Lake Keowee to operate the turbines for the production of electrical power. The **PRIMARY** purpose for Keowee is to provide back-up Emergency Power for Oconee Nuclear Station. When emergency power is not required, the hydro station has been designed to generate electricity to the Duke Power System grid for lake level control and system load peaking. However, supplying power to the grid shall in no way diminish the Keowee Station's ability to supply reliable emergency electrical power to Oconee.

The plan does not only outline management's expectations, but where it may be recognized that those expectations are not currently being met, the program or steps necessary to progress from the current state to meeting those expectations are also identified. In those areas where management programs have not been established or fully evaluated, the steps to be taken to bring these programs in line with the standards have been included, along with the schedules for achieving these programmatic changes and reviews. Additionally, known equipment problems and modifications associated with Oconee's emergency power supply, along with schedules and accountabilities for their completion, have been included. This Plan also includes all the remaining corrective actions resulting from the October 1992 AIT Inspection and 1993 EDSFI audit. Periodic revisions and redistribution of this document will be required to communicate the completion of initiatives and the addition of any new challenges or expectations.

Section II  
CONDUCT OF OPERATIONS

A. Operating Philosophy

The conduct of operations at the Keowee Hydro Station shall be performed in a manner that insures a reliable source of emergency power to the Oconee Nuclear Station. The Keowee Hydro Station (KHS) may be utilized to generate to the Duke Power system grid at the direction of the Charlotte System Operating Center. Routine operation of the facility provides a high level of confidence in the availability of the units. However, generation of power to the grid shall not diminish the ability of KHS to provide emergency AC power to ONS.

The operational objective of this plan is to establish the Keowee Hydro Station as among the most reliable emergency power sources in the nuclear industry. Measurement of progress towards, and achievement of this objective is to be measured through two industry standard performance indicators: Safety System Unavailability as defined as an INPO performance indicator, and start reliability as defined in Reg Guide 1.108.

B. Organization and Lines of Communication

On November 9, 1992 the Keowee Hydro Station personnel were re-aligned to report through the Oconee Operations Group organization. This organization places full accountability and responsibility for conduct of Keowee operations with the Oconee Operations Superintendent. This change assures that the ONS emergency power source is operated and maintained in a manner consistent with the standards for all ONS safety systems. As members of the ONS Operations group, KHS personnel work practices shall be in accordance with policies and procedures of the Nuclear Generation Department, as defined in the Nuclear Policy Manual.

KHS personnel duties and responsibilities are described in the ONS Operations Management Procedures (OMP). OMP 5-2 describes the standards and expectations for the Keowee Station Supervisor, technical staff and shift operators. The responsibility for monitoring and assuring consistent quality of operations at the KHS rests with the Keowee Station Supervisor. The responsibility for the safe operation of the KHS rests with the Keowee operator on duty. A conservative approach to the operation of the KHS shall be taken at all times.

Due to the importance of the KHS in being able to supply emergency power to ONS, well defined lines of communication must be established and maintained. To integrate the Keowee shift operators with the operating shift teams, each Keowee operator is assigned to work with a particular

operating shift, following the same shift rotation schedule. Every member of the station organization shall endeavor to keep supervision and technical personnel informed of changes to station status. At the beginning of each shift, the KHS shift operator establishes communications with the Oconee Unit 2 control room to provide the status of any abnormal conditions effecting Keowee operations. He or she additionally performs a radio check of the emergency radios system. Abnormal conditions effecting Keowee operations which occur during the shift are communicated to the ONS Unit 2 control room personnel immediately, and then to KHS supervision as soon as possible.

A rotation will be established where the Keowee Operator periodically is required to accompany an ONS Non-Licensed Operator (NLO) on his watch stations. Conversely an ONS Non-Licensed Operator will periodically accompany a KHS operator on his rounds. This exchange will enhance their knowledge of one another's equipment and expose them to the standards and expectations of each position.

C. Emergency Operations

The October 19, 1992, Oconee Loss of Switchyard Event, identified the need for a procedure to provide KHS operator guidance when Keowee receives a valid emergency start signal. AP/O/A/2000/02 was developed and approved in October 1992 for this purpose. This procedure provides the Keowee operator direction for the actions to be taken in the event that an emergency start signal is generated for KHS. Keowee is designed to function in a fully automatic mode when responding to emergency conditions at Oconee. The primary function of the Keowee operator is to verify that these automatic actions have occurred. This procedure provides directions for 1) verifying that automatic actions have occurred as designed, 2) establishing communications with the Oconee control room, and 3) taking actions to manually compensate for any failed automatic functions.

The compensatory actions within this procedure provide direction to Keowee operator in the event a unit fails to start upon an emergency start demand, or the Keowee auxiliary power system fails to provide AC power to it's associated unit's auxiliary loads. All Keowee operators are fully qualified to each of these tasks. In the event that a manual start is necessary, and the Keowee operator is unable to perform this task, the Oconee licensed operators are qualified to perform this task from the Oconee control room. In the event that the Keowee operator is unable to perform any necessary switching operations with the auxiliary power system, each licensed and non-licensed Oconee operator will be qualified to be dispatched to KHS to perform this function.

D. Surveillance Testing

The Design Basis Documentation process is defining the features of the

Oconee Emergency Power supply necessary to fulfill its design function. A testing program will be established to assure that each design feature which can reasonably be tested (without significant risk to equipment or safe operation of the Oconee units) has been tested. Those features which can degrade as a function of equipment aging or maintenance will be tested on a periodic basis. Several first time or infrequent tests have been performed since October, 1992.

### Section III TRAINING PROGRAM

#### A. Training Philosophy

After the October 19, 1992, Oconee Loss of Switchyard Event, and subsequent re-alignment of the Keowee operating staff to the Oconee Operations Group, an enhanced Keowee Operator Training Project was initiated. Prior to this, training for the Keowee Hydro Operator had largely been composed of unstructured on the job training, augmented with some specialty classroom formal training. In alignment with the Oconee Nuclear Station Training Programs being accredited by the National Academy for Nuclear Training, it was determined that Keowee operator training program standards should be raised to this same standard. Accordingly, the Keowee operations training program will include the structure, and be established as a performance based training program, commensurate with the requirements for accreditation by the National Academy for Nuclear Training.

In addition to assuring that the Keowee operators are completely equipped to handle both normal operations as well as emergencies, it is also important that the Oconee operators be equipped to provide any needed assistance to the Keowee operators if called upon to do so. As a portion of designing the Keowee Operations Training Program, necessary improvements to the Oconee Operations Training Program will also be implemented.

#### B. Methodology

The content, structure, and makeup of the Keowee operator training program is to be determined through a Systematic Approach to Training (SAT). The nuclear station training programs are defined by the Employee Training and Qualification System (ETQS) as described in the ETQS Manual. This manual contains standards for the management and control of the nuclear training programs. The result of using the SAT process is performance based training that is consistent and valid, and yields repeatable results.

To initiate this systematic process for the Keowee Operator Training Program, the Oconee Operations Training Group assigned an Instructor with Senior Reactor Operator qualifications to provide leadership and direction to the project. A nuclear operations specialist from the Nuclear Generation Department Operations Group, and two instructional technology experts from the System Technical Training Center were assigned to provide the data collection and design principles in the project. Keowee operators, technicians, and supervisor work with the principles to provide subject matter expertise (SME), and validation of data collected.

The initial phase of the project included a review of the Keowee Abnormal Procedures (APs). Critical Job Performance Measures (JPMs) were developed in support of these APs. These JPM's encompassed the all conceivable failure scenarios which the operator could be called upon to deal with

during implementation of the AP. The Keowee Operators were trained and qualified to these critical JPMs between October 26, 1992, and November 19, 1992.

An organized plan was initiated on December 7, 1992 to complete a Job Task Analysis (JTA) for the Keowee Operator and Keowee Technician Classifications. This new training program will be composed of two major segments. The first is a structured on-the-job training (OJT) program, and the second is a formal classroom training program.

ONS licensed operators have receive training in Keowee operations during preparation for license examination. Additionally, following the October 19, 1992 event, all Oconee licensed operators reviewed the KHS Auxiliary Power System, the Keowee Emergency Start Abnormal Procedure, and the Keowee Critical JPMs in classroom requalification training. Also, all the ONS Licensed Operators walked through these Critical JPMs at the KHS with an Operations Training Instructor. In order to further enhance the ability of Oconee operators to provide assistance to the Keowee operators, all Oconee operators will be fully qualified to the JPMs associated with emergency switching operations of the Keowee auxiliary power system.

After completion of the JTA and assessment and training (if necessary) of the present Operators, KHS Continuing Training will be developed and scheduled. This training is expected to consist mostly of review of critical T&Q Guides, with successful completion of any associated JPMs. There is also expected to be about one to two days per quarter of classroom presentation.

Presently the KHS personnel perform the majority of the required MM, IAE, and Performance work for KHS. At ONS, most of this work is accomplished by the specific discipline the work is appropriate for. A list of these tasks will be generated and then reviewed by ONS management. The review will identify which discipline (MM, IAE, Performance, or Keowee Operator) will be responsible for the task. After this decision has been made, each discipline will assess which tasks need to be analyzed to be supported by their ETQS program.

Section IV  
MAINTENANCE PROGRAM

A. Philosophy

The Emergency Power System Maintenance Program has been developed to include programmatic support for the transition of Keowee maintenance functions completely into the Oconee maintenance program, and to develop specific goals, define the actions required to accomplish these goals, and establish a time frame for these actions to occur. When complete, the following elements will be in place:

**Plant Documentation:** All documents and drawings used to support the Emergency Power System reflect plant configuration. All plant parameters such as setpoints will be controlled and documented.

**Procedures:** Procedures will be in place to cover all safety-related work within the Emergency Power System and at Keowee. Procedures for associated work will be developed as deemed necessary.

**Preventive\Predictive Maintenance:** A preventive maintenance program will be in place with the basis for and frequency of maintenance clearly identified. Predictive technologies are being employed as appropriate to assure maximum reliability.

**Spare parts:** Spare parts are identified and stocking levels will be justified and established.

**Failure trending:** PIP program serves as the primary mechanism for failure identification and follow up. Secondary programs are in place to trend failures or recurring problems within the Emergency Power System and its components.

B. Methodology

Transition of "ownership" of the maintenance program (or parts of it) from Keowee operations personnel to other organizations such as I&E will be evaluated and then scheduled if a need for change is identified. In the former on-site transmissions area, the "ownership" of the maintenance will likely remain within the same functional area; therefore, the maintenance program will concentrate on the work flow and practices within this area.

The processes necessary to achieve this plan and the progress to date are briefly described below:

1. **Division of Responsibilities** - The structure will be formulated to integrate the Power Delivery Department and Keowee Hydro workload and workforce within the Oconee site organization.

Internal to the Site - Within Component Engineering the newly



acquired equipment responsibilities have been assigned to specific engineers in the same manner as all other plant equipment.

External to Site - Two major documents are in the process of being developed:

The "Nuclear Generation/ Power Delivery/ Generation Services Maintenance-Electrical Interface Agreement for Nuclear Stations" is in the final stages. This document outlines specific group responsibilities in terms of physical boundaries at all three Duke nuclear sites. As defined in that agreement, Component Engineering will assume the primary technical support for that equipment delineated as station equipment and will interface with Power Delivery (PD) and Generation Services Maintenance - Electrical (GSME) as required with regard to the other equipment.

The "PD/NGD Switchyard Interface Agreement-Engineering/ Design Responsibilities" defines the areas of responsibility for the Engineering and Design functions for modifications, additions, and repairs in the switchyard at Duke nuclear stations. This agreement will ensure that design practices in the switchyard receive the same engineering review as the remainder of the station.

2. **Preventive Maintenance Program** - Implementation of the Preventive Maintenance Program is a joint effort between the planning, execution, and engineering functions.

Component Engineering evaluates, reviews, and approves all additions, revisions, and deletions to the Preventive Maintenance program. As part of this transition effort, there will be a comprehensive review of all existing PMs in the Keowee and High Voltage areas to ensure that this equipment is receiving the appropriate maintenance to maximize equipment reliability and availability.

3. **Procedure Review Program** - A review of all existing procedures in the High Voltage and Keowee areas has been initiated to ensure that appropriate directions are provided to the qualified technician/electrician.

This effort will be multi-faceted. Operating experience (e.g., PIP, OEP) will be used to identify procedures that need to be created and/or revised. Existing procedures will be reviewed, procedures for switchyard work checked for adequacy, work on safety related equipment verified and covered under existing procedures, and new procedures will be generated, or procedure steps revised in existing procedures where warranted. As other deficiencies in procedures are identified, these problems shall be noted and a plan for resolution developed. As is current station maintenance practice, it is expected that anytime an error is identified in a procedure that a change will be initiated immediately. In addition to station

procedures, Power Delivery Department, Generation Services Department, and Fossil/Hydro Department procedures for station equipment will also be evaluated. Under the latest interface agreement, the station has assumed control of Power Delivery Department's station specific procedures. This includes writing, revision, review, and administrative control of all of these procedures.

4. **Other** - As the equipment responsibility transition takes place, several parallel changes are also occurring.
- Budgets and budget forecasting for these formerly autonomous groups are being considered within the site maintenance budget.
  - Increased exposure to site directives and programs will aid in procuring properly documented work packages and parts (e.g. WMS, Commercial Grade Program, Acceptable Substitute Program, Minor Mod Program).
  - Improved interaction with site engineering organizations will facilitate tracking and trending of equipment failures. The PIP program and aspects of the Technical Support Program both serve to increase the engineering review of equipment failures.

Section V  
ENGINEERING PROGRAM

A. Philosophy

A well defined engineering program is essential to maintaining a reliable emergency power source. Emergency power source responsibilities are assigned in the Engineering organization. Engineering resources shall be committed to the timely resolution of design, equipment and maintenance issues associated with the ONS emergency power source.

B. Organization

The Discipline Engineering, Component Engineering, and System Engineering Organizations for Oconee's Emergency Power Source are structured to respond as it would for any other safety related system at Oconee. Detailed accountabilities can be found in applicable Site Directives, Nuclear System Directives, Engineering Document Manual, and Systems Engineering Manual.

C. Nuclear Station Modification (NSM)/Minor Modification (MM)

The NSM/MM programs provide the guidance to allow for modifications of systems, structures, and components. This program is applicable to all systems, structures, and components in the Keowee Hydro Station, Emergency Power system, and the 230KV switchyard except for the 525KV/230KV auto transformer, bus and disconnects that connect the auto transformer to the 230KV circuit breakers 31 and 33. Circuit breakers 58, 59 and motor operated disconnects 58B and 58A for the 525KV system are also included. The specific details of the NSM/MM programs are detailed in the Nuclear System Directive 301 and Site Directive 2.2.1.

D. Calculations/Analyses

A formalized program for preparing and controlling Design calculations and analyses are detailed in section 101 of the Engineering Document Manual. This guidance is applicable to all calculations and analyses for the Emergency Power system. Engineering review has identified the need for additional calculations to support system design.

E. Operating Experience Program (OEP)

A detailed program for the collection, evaluation, and assimilation of operating experience information is detailed in Nuclear System Directive 204 Operating Experience Program. This program is applied to the Emergency Power systems for the review of applicable OEP information.

A review of past OEP items associated with the emergency power source will be completed to ensure they have been appropriately evaluated.

F. Establishing Design Criteria/Design Basis Document

Design Criteria have been developed for Keowee and the Emergency Power system based on guidance provided under section 170 of the Engineering Document Manual. These Design Criteria are then included in a more detailed document called a Design Basis Document (DBD). This document details the design basis and system functionality for each system based on a review of existing licensing, design, and plant operational documents.

The DBD development program is ongoing and most systems associated with emergency power system have Design Basis documents developed. As design and engineering criteria for the emergency power source are evaluated, associated DBDs will be revised to reflect any changes.

G. Seismic Qualification Utility Group (SQUG)

SQUG is a nuclear industry effort to assist the NRC in the resolution of Unresolved Safety Issue A-46, "Seismic Qualification of Equipment in Operating Plants", for older vintage nuclear stations. The resolution of A-46 led to the development of the Generic Implementation Procedure (GIP). The GIP methodology determines equipment adequacy following a Design Basis Seismic Event based on experience data, test, analysis, and trial plant walkdowns. The focus of A-46 is equipment required to bring the plant to and maintain hot shutdown for 72 hours following a Design Basis Seismic Event. The Emergency Power system falls under these guidelines for evaluation.

Civil Discipline Engineering is currently developing a schedule to conduct in-plant walkdowns of identified systems at Keowee and ONS Units 1, 2, and 3. Results of the walkdowns and other GIP methodology will be utilized to evaluate applicable systems to the standards established for A-46.

H. Reliability/Availability

Reliability/availability evaluations for Keowee are performed based on guidance provided in the Keowee Emergency Power Source Reliability Program directive in the Systems Engineering Manual. The methodology to perform this analysis is based on the current industry accepted INPO standards for Reliability/Availability analysis.

System Engineering currently tracks Keowee start reliability and Keowee unavailable hours. Emergency power source availability will be expanded to include the power paths to Oconee from Keowee to provide a better indicator of actual system availability.

I. Design Studies

This is a formalized program used to evaluate a technical problem/issue to determine what modifications may be needed to resolve the problem/issue. This program is also used to evaluate alternative solutions when more than one viable option exists. The results of the

Design Study are presented in a Technical Report format. Design Studies are utilized in evaluating technical problems/issues with the Emergency Power System and providing technical input for the origination of modifications to correct the technical problem/issue.

J. Component/Equipment Classification

The methodology for determining and identification of the safety related classification of components, systems, and structures is detailed in the Quality Standards Manual for Structures, Systems, and Components. The current classification of components, systems, and structures for the Emergency Power system is outlined in this manual. An effort is currently underway to review and reevaluate the safety related classifications for Keowee Hydro and the Emergency Power source components, systems, and structures.

K. Testing

The corporate criteria for developing and implementing testing for ONS components/systems is outlined in Nuclear System Directive 703. Specific procedures are written for testing components/systems. Detailed component/system test acceptance criteria is detailed in the Test Acceptance Criteria Document. Testing for Keowee and the Emergency Power system are developed and implemented following the guidance provided in these documents. Additional testing requirements for ISI components are detailed in the Inservice Inspection Program Manual. Emergency Power system components are currently being evaluated for their inclusion into the ISI testing program.

L. Aging Equipment

Due to the vintage of Oconee Nuclear and the Keowee Hydro stations, the ability to maintain obsolete and aging equipment has become a larger programmatic issue. An Aging Equipment list was originated in the mid 80s and recently updated by the Work Control Section. The purpose of this list is to identify and evaluate the risks associated with plant components that will have to be extensively modified or replaced over the life expectancy of the plant. This list is incorporated into site long range planning to identify future budget needs. The list will be utilized for identifying future NSMs required to replace components that can no longer be adequately maintained or provide their intended function. Emergency power source components are included in this list and additional components will be added when identified.

M. Configuration Control

The NSM, Minor Modification and Editorial Change programs outlined in Nuclear System Directive 301 are the programmatic mechanisms used for configuration control management for the Oconee Nuclear Station. Configuration control for the Emergency Power system fall under the requirements of these programs.