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SUBJECT: Forwards summary of DPC commitments & relationships to open SWS operational performance insp items. Key commitment is upgrade of CCW sys which will eliminate reliance on ECCW siphon to mitigate any design basis accident.

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DUKE POWER

March 9, 1995

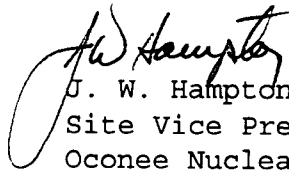
U. S. Nuclear Regulatory Commission
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Washington, DC 20555

Subject: Oconee Nuclear Station
Commitments from February 24, 1995 Service Water
Meeting

Duke Power Company and the NRC met on February 24, 1995 to discuss outstanding issues associated with the Service Water Systems Operational Performance Inspection (SWSOPI). Duke Power Company made several commitments during this meeting.

Attached is a summary of the Duke Power Company commitments and their relationship to open SWSOPI items. A key commitment is an upgrade of the CCW System which will eliminate reliance on the ECCW siphon to mitigate any design basis accident. A conceptual summary of the CCW upgrade modification is included in the attachment. If necessary, a more detailed description of the modification can be provided to the NRC by May 1, 1995. As was discussed during the meeting, Duke Power Company requests NRC feedback concerning the adequacy of this design.

Very truly yours,


J. W. Hampton
Site Vice President
Oconee Nuclear Station

Attachment

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cc: Mr. P. E. Harmon
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Oconee Nuclear Station

Summary of Commitments from the February 24, 1995 DPC/NRC Meeting

URI 93-13-03

Duke Power Company believes that the CCW upgrade modification (NSM-52932) will resolve most of the concerns associated with this URI. This modification will be implemented on the first unit during the U3EOC16 outage, currently scheduled for the fourth quarter of 1996. The modification will be completed for all three units by the end of 1997. A brief summary of the CCW modification is as follows:

Upgrade that portion of CCW which supplies LPSW to QA1, using a combination of on-site certification and replacement.

- CCW pumps and motors
- Pump discharge valves
- Current control circuitry
- Power supplies

Install a QA1 water supply from LPSW to the CCW pumps.

- Fed from both Unit 3 LPSW System and Units 1&2 LPSW system
- Provide lubrication to the pump bearings and cooling to the motor oil cooler
- Will eliminate the need for HPSW to CCW.
- Cooling water lines from LPSW headers will be:
 - buried, stainless steel
 - seismic
 - single active failure proof
 - current plans are that HPSW will remain as a backup, and will normally be closed

Install QA1 Control Circuitry to auto restart selected (either 1 or 2 pumps total) CCW pumps 2-5 minutes after loadshed.

- Will eliminate the need for the siphon to supply LPSW suction
- Will eliminate LPSW pump NPSH concerns
- New circuitry will meet current electrical design criteria (e.g., separation, redundancy)

NOTES: 1. Electrical separation will be achieved with the current trench (accomplished by 5 inches of air space between each of the 3 cable trays).

2. Modification will maintain current seismic qualification.
3. No plans to incorporate tornado design criteria.
4. Plans are to replace the current Tech Spec surveillance on the first siphon with a surveillance Tech Spec on the auto restart capability.
5. Mini flow requirements are currently met with a combination of LPSW demands plus either CCW-8 or the condensate cooler flowpath.

In addition, to ensure the continued reliability of the first part of the ECCW siphon until this modification is implemented, Duke Power Company commits to the following:

- ECCW System test procedure acceptance criteria will be documented to enable extrapolation of test results to worst case conditions (See response to VIO 94-31-04).
- A safety-related procedure will be developed and implemented for the CCW pump flange seals prior to the lake level decreasing below 792 feet (PIP 94-0252). These procedures will be performed on a six month frequency if the lake level remains below 792 feet.
- Test acceptance criteria for the first part of the ECCW System siphon are based on the requirement that the siphon must last at least 1.5 hours.
- Ensure the maintenance procedure for valve HPSW-25 is a safety-related procedure, with the exception that non-QA-1 parts are acceptable replacement parts.

93-25 Cover Letter, Finding #7

- Part a: Procedures will be revised for HPSW-2 and HPSW-5 by August 31, 1995. A relief request for HPSW-8 will be submitted to the NRC by August 31, 1995.
- Part b: See VIO 94-34-01(d) response.
- Part c: See VIO 93-25-04(b) response.
- Part d: See URI 93-13-03 response.
- Part e: See DEV 93-25-10 response.

Part f: The trench covers have been bolted down per OE-6596. The resident inspectors will confirm the adequacy of these covers.

Part g: Duke Power is responding to this issue with its safety-related designation effort discussed with the NRC during the February 6, 1995 Management meeting. At the February 24, 1995 meeting Duke Power committed to upgrading to safety-related procedures for the portion of the CCW System which supplies suction flow to the LPSW pumps by the fourth quarter of 1996. This is when the CCW upgrade modification will be implemented on Unit 3. Although the modification will only be installed on Unit 3 by the end of 1996, the CCW System procedure upgrades will be implemented on all three units by the end of 1996.

93-25 Cover Letter, Weakness #1

Part c: Review all required functions identified in mechanical systems DBDs against existing calculational support for that function. Initiate a PIP to document any inadequate calculational support and identify appropriate corrective action (PIP 94-1177). This activity will be completed by June 1, 1995.

Part d: Review all required functions identified in mechanical systems DBDs against existing EOPs and APs. Initiate a PIP to document any inadequate guidance and identify appropriate corrective action (PIP 94-1178). This activity will be completed by June 1, 1995.

93-25 Cover Letter, Weakness #3

Review all required functions identified in the DBDs against existing test procedures to ensure the function is being appropriately verified. If an inadequacy is identified, a test procedure will be revised or created to verify the function (PIP 94-1179). This activity will be completed by June 1, 1995.

93-25 Cover Letter, Weakness #4

This issue deals with the QA classification of components which perform safety-related functions. Duke Power Company outlined its process to enhance the QA program at a February 6, 1995 Management meeting with the NRC.

DEV 93-25-01

1. The GL 89-13 response will be revised by April 4, 1995 to address issues identified by the NRC.
2. Revise the EOP to remove specific flow guidance for the ASW pump and complete training on the EOP revision (see VIO 93-25-12, example B response).
3. Create operating procedures for the Keowee Units 1&2 Thrust Bearing Oil Heat Exchangers and Generator Air Coolers. This issue will be addressed in our response to VIO 94-31-01, Example A, which will be submitted to the NRC by March 15, 1995.

VIO 93-25-03

Example A: This issue deals with NPSH to the LPSW pumps during a LOCA/LOOP event with a loss of all air, a single failure of an LPSW pump, and the non-LOCA unit in an outage. The CCW upgrade modification described in response to URI 93-13-03 will eliminate this concern.

Example C The resident inspectors will be given the Belzona analysis by May 12, 1995.

Example D: See IFI 94-31-03 response.

Example E. Complete calculations on the heatup of the intake canal and the potential inventory losses (due to leakage, evaporation, etc.) during the loss of Lake Keowee scenario and update appropriate design documents. This effort will be completed by June 1, 1995.

Example F: Complete calculations on the range of flowrates and the heatup of LPSW during the loss of Lake Keowee scenario. Determine the time to reach the maximum allowable LPSW System temperature based on LPSW pump NPSH. If necessary, update affected abnormal procedures and design documents. This activity will be completed by June 1, 1995.

VIO 93-25-04

Example A: Provide a schedule for the implementation of a modification which installs an orifice in the LPSW piping downstream of the RBCUs to prevent cavitation. This commitment has been revised since analyses

demonstrate there is no reason to modify the piping. The analyses have been completed for Unit 3. A copy of the calculation file, OSC-5935, was provided to the NRC during the February 24, 1995 meeting. The calculations for Units 1 and 2 will be completed by March 15, 1995. A copy of the completed calculation file will be given to the resident inspectors.

IFI 93-25-05, Part b

Air flow measurements with the RBCUs on low speed will be taken during the U3EOC15 outage.

IFI 93-25-06

Part b: The "Loss of Condenser Circulating Water Intake Canal/Dam Failure"; AP has been revised to address the indicated weaknesses. A copy will be given to the resident inspectors.

Part c: A tornado drill be performed by December 31, 1995 to evaluate the ability of the operators to respond to a tornado.

VIO 93-25-08

Example A: Procedures are being revised in preparation for the next refueling outage on each unit to incorporate the appropriate measurement error.

Example B: Perform a reverse flow test of SSF ASW piping to verify that an open flow path will be available during an SSF event. This test has been successfully completed on Units 1 and 2. The test for Unit 3 will be performed during the U3EOC15 outage.

DEV 93-25-10

Improve PT/O/A/250/35, "Elevated Water Storage Tank Drain Test" to require the following actions in the event of a leaking pump discharge check valve:

1. Write a Priority 1 work request to fix the leaking pump discharge check valve.
2. Refer to SLC 16.9 for the appropriate LCO, if necessary.
3. Rerun the test after the pump discharge check valve is repaired.

These activities will be completed by May 1, 1995. A copy of the procedure will be provided to the resident inspectors.

VIO 93-25-12

Example A: The NRC is concerned that a process does not exist to identify all of the previous calculations that are affected by a revision to a calculation. Oconee plans to develop an electronic database of engineering calculations that will allow searching and/or indexing of calculations to enable a more adequate determination of the cascading effect of a calculation file change. A schedule/scope for this project will be established by June 1, 1995.

Example C: See VIO 94-31-01, Example B response.

IFI 93-25-14

See VIO 94-31-01, Example C response.

IFI 93-25-15

Calculation OSC-3528 has been revised to address the issues identified in IFI 93-25-15. A copy of the calculation file will be provided to the resident inspectors. Revisions to SLC 16.9.7 are currently being assessed. If deemed necessary, these revisions will be implemented by July 31, 1995.

LER 94-04

NSM-52932, addressed earlier in response to URI 93-13-03, will eliminate the root cause of LER 04-04. A supplement to this LER will be submitted by March 31, 1995 to address the issue of removing the Unit 1 MFBS from service. Corrective actions regarding a revision to SLC 16.9.8 will be documented in this LER.

VIO 94-31-01

A response to this violation will be submitted to the NRC by March 15, 1995.

IFI 94-31-02

Test acceptance criteria will be established by October 12, 1995 to ensure that LPSW pump performance remains at least as good as

what is assumed in the design basis calculations. In the interim, the LPSW system engineer reviews IWP test results and ensures their acceptability.

IFI 94-31-03

A revision to OSC-2346 (Revision 6) has been completed to correct the deficiencies identified in IR 94-31. A copy of this calculation file will be provided to the resident inspectors:

VIO 94-31-04

A response to this violation will be submitted to the NRC by March 15, 1995.

URI 94-31-06

A minor modification will be implemented by December 31, 1995 to enable the operators to remotely make up the SFP, during an SSF event. The modification will install a pipe with hose connections so that the operators can make up to the SFP without being exposed to high radiation levels. Calculations will be completed by December 31, 1995 to quantify the time required to make up to the SFP. In addition, procedures will be revised by December 31, 1995 to provide more detailed guidance on the time limitations associated with adding water to the SFP during an SSF event.

IFI 94-31-07

See the response to 93-25 Cover Letter, Weaknesses 1, 2, 3 and 4.

VIO 94-31-08

A response to this violation will be submitted to the NRC by March 15, 1995.