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SUBJECT: Provides suppl response to plant QA-1 licensing basis & GL 83-28,Section 2.2.1 subpart 1.

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DUKE POWER

July 10, 1995

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Oconee QA-1 Licensing Basis and Generic
Letter 83-28, Section 2.2.1, Subpart 1
Supplemental Response

In correspondence dated April 12, 1995, Duke provided the NRC with a clarification of Oconee's licensing basis regarding the scope of Oconee structures, systems, and components (SSCs) subject to Appendix B of 10 CFR 50. This clarification was provided in Attachment 3 of the April 12th letter. Attachment 3 was divided into Parts I and II, titled "Original Oconee QA-1 Licensing Basis (FSAR Section 3.1.1)" and "Oconee QA-1 SSCs added to the Original Licensing Basis", respectively. Duke stated that a detailed licensing search was underway to prepare a list of commitments for Part II, and that this list would be provided to the NRC by July 10, 1995. Please find attached this Part II listing which specifies QA-1 commitments added since the original licensing basis. The term "QA-1" is used at Oconee to designate which SSCs must meet the Appendix B quality assurance requirements. It should be emphasized that the QA-1 designation does not indicate that any nuclear safety related design criteria requirements must also be imposed.

The attached Part II is the result of a resource-intensive search of licensing correspondence for statements where Duke committed to add or upgrade SSCs to meet the QA-1 quality assurance program. Each of these commitments is included in the listing. In addition to these commitments, however, Duke found a number of instances where correspondence is not conclusive. For these, requirements for application of the QA-1 program can be derived only from studying the larger context of the specific regulatory issues involved. These instances are not currently included in the attached Part II listing. Duke's review of these cases will require considerably more research and effort. The schedule for researching and documenting the origin of these QA licensing bases will be provided by August 25th, 1995.

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It is expected that the results of this effort will be beneficial for both Duke's and the NRC's understanding of the Oconee QA-1 program. If there are any questions regarding this document, David Nix can be contacted at (803) 885-3634.

Very truly yours,

J. W. Hampton for

Attachments

cc: Mr. S. D. Ebneter, Regional Administrator
U. S. Nuclear Regulatory Commission, Region II

Mr. L. A. Wiens, Project Manager
Office of Nuclear Reactor Regulation

Mr. P. E. Harmon
Senior Resident Inspector
Oconee Nuclear Site

Oconee QA-1 SSCs Added to the Original Licensing Basis

#	Commitment	Reference
1	"The power supply for the [motor driven EFW] pumps and controls will be from the 4160V safety-related buses."	4-25-79 letter from Duke (W O Parker) to NRC (H R Denton) regarding improvements to EFW system
2	"a hard-wired control grade reactor trip on loss of main feedwater and/or turbine trip" ... "will be revised to safety grade."	4-26-79 letter from Duke (W O Parker) to NRC (H R Denton) regarding response to ONRR Status Report. See also 5-21-79 letter from Duke (W O Parker) to NRC (R W Reid) regarding anticipatory reactor trip.
3	EFW flow transmitters "upstream of the flow control valves in the flow path to each steam generator" ... "will be upgraded to safety grade"	10-18-79 letter from Duke (W O Parker) to NRC (H R Denton) regarding response to NUREG-0578. See also 11-21-79 letter from Duke (W O Parker) to NRC (R W Reid) regarding supplement to NUREG 0578 response.
4	"In addition to the present qualified containment pressure transmitters, we will install additional safety grade qualified pressure transmitters capable of displaying in the control room..."	10-18-79 letter from Duke (W O Parker) to NRC (H R Denton) regarding response to NUREG-0578. See also 1-2-80 letter from Duke (W O Parker) to NRC (R W Reid) regarding NUREG-0578.
5	"In addition to the presently installed non-safety grade sump level indication, we will install the appropriate safety grade instrumentation to indicate in the control room the containment water level."	10-18-79 letter from Duke (W O Parker) to NRC (H R Denton) regarding response to NUREG-0578. See also 1-2-80 letter from Duke (W O Parker) to NRC (R W Reid) regarding NUREG-0578.
6	"A system with safety grade hydrogen monitors... will be provided with readout instrumentation in the control room."	10-18-79 letter from Duke (W O Parker) to NRC (H R Denton) regarding response to NUREG-0578.

7	EFW control valves are safety-related	11-21-79 letter from Duke (W O Parker) to NRC (R W Reid) regarding supplement to NUREG 0578 response
8	"The TDEFWP initiation is presently control grade and will be upgraded by the installation of qualified switches., cabling, and other components as required. The MDEFWPs presently have safety grade initiation and no further upgrade is required."	11-21-79 letter from Duke (W O Parker) to NRC (R W Reid) regarding supplement to NUREG 0578 response. See also 10-05-79 letter from Duke (W O Parker) to NRC (R W Reid) regarding anticipatory reactor trip and 10-18-79 letter from Duke (W O Parker) to NRC (H R Denton) regarding response to NUREG-0578.
9	"Two physically and electrically separated containment radiation monitors shall be provided ... shall be qualified to IEEE-323, 1971, and powered from the vital instrument buses."	1-2-80 letter from Duke (W O Parker) to NRC (R W Reid) regarding NUREG-0578. See also 8-15-83 letter from Duke (H B Tucker) to NRC (J F Stolz) regarding containment radiation monitors.
10	RCS high point vents: "power will be available from a safety grade source"	1-2-80 letter from Duke (W O Parker) to NRC (R W Reid) regarding NUREG-0578.
11	"...a safety grade differential pressure transmitter sensing steam generator level will be added for each steam generator."	1-31-80 letter from Duke (W O Parker) to NRC (H R Denton) regarding NUREG-0578.
12	Appropriate Standby Shutdown Facility SSCs as identified in referenced correspondence	2-1-78, 3-28-80, 2-16-81, 3-31-81, 4-13-81 letters from Duke (W O Parker) to NRC (E G Case, R W Reid, R W Reid, J F Stolz, J F Stolz, respectively) regarding the SSF design.
13	"[The RPS] DC breakers and the UV devices are treated as safety-related although the DC breaker cabinets are not seismically qualified."	3-21-83 letter from Duke (H B Tucker) to NRC (J P O'Reilly) regarding response to IE Bulletin 83-04.

14	The portion of instrumentation committed to be QA-1 in response to Regulatory Guide 1.97 - including all Type A Category 1 and also other specifically committed Category 1 instrumentation of Types B, C, D, E.	9-28-84 letter from Duke (H B Tucker) to NRC (J F Stolz) regarding Reg Guide 1.97 report, Rev 6.
15	"Additional safety instrumentation (RCS pressure, pressurizer level, high pressure injection flow, low pressure injection flow, etc.) will be added at Oconee as outlined in Duke Power's 'Response to Supplement 1 to NUREG-0737' for Oconee..."	7-19-85 letter from Duke (H B Tucker) to NRC (J F Stolz) regarding the Safety Parameter Display System.
16	"a safety-related Inadequate Core Cooling Monitoring System will be added to each Oconee unit"	10-20-86 letter from Duke (H B Tucker) to NRC (J F Stolz) regarding response to GL 86-05
17	ISFSI dry storage cannister and transfer cask	ISFSI Safety Analysis Report, Section 4.0. See also 11-23-88 letter to NRC "Response to NRC - Safety Analysis Report"
18	2, 3LP-3 power and position indication upgraded to safety grade.	1-12-93 & 3-28-94 letters from Duke (J W Hampton) to NRC regarding "Post LOCA Boric Acid Concentration Control System"
19	"All new equipment [for the Keowee Auxiliary Load Center Transfer Modification] will be QA qualified equipment, and will be powered from a safety related DC source."	4-29-93 letter from Duke (J W Hampton) to NRC regarding "Corrective Action for October 19, 1992 Loss of Offsite Power." See also 12-6-93 letter from Duke (J W Hampton) to NRC regarding Tech Spec 3.7.
20	LPSW flow measurement to LPI coolers will meet "Type A, Category 1 ... of Reg Guide 1.97"	4-29-93 letter from Duke (J W Hampton) to NRC regarding "Regulatory Guide 1.97"

21	"All new equipment added by the degraded grid protection modification is Class 1E"	8-31-93 letter from Duke (J W Hampton) to NRC regarding "Offsite Power from the 100kV Transmission System." See also 5-8-90 letter from Duke (H B Tucker) to NRC regarding "Switchyard Degraded Voltage."
22	Portions of CCW providing suction to LPSW	3-9-95 letter from Duke (J W Hampton) to NRC regarding SWOPI meeting follow-up.
23	Instrument tubing on ECCS to be reclassified as QA-1	2-23-95 Meeting Summary from NRC (E W Merschoff) to Duke (J W Hampton) regarding 2-6-95 NRC / Duke meeting.
24	Automatic feedwater isolation controls for MSLB	6-14-95 letter from Duke (J W Hampton) to NRC regarding supplemental response to IEB 80-04
25	"safety-related maintenance and test procedures, and components will be applied for future maintenance on the subject 6.9 kV and 4 kV switchgear breakers."	6-7-93 and 6-14-93 letters from Duke (J W Hampton) to NRC regarding responses to Notice of Violation