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SUBJECT: Submits suppl response re ONS QA-1 licensing basis & GL 83-28, Section 2.2.1, Subpart 1, including plan for clarifying remaining items re QA-1 commitments. O

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DUKE POWER

August 25, 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 July 10, 1995, Duke provided the NRC with a list of "QA-1 commitments" that require certain Oconee structures, systems, and components (SSCs) to be subject to Appendix B of 10 CFR 50. The list resulted from a review of Duke correspondence to the NRC, and specified QA-1 commitments added since the original Oconee licensing basis. The letter also explained that the Duke correspondence reviewed was not conclusive in a number of instances. For these, commitments to apply the QA-1 program can be clarified only after further research and effort. The schedule for researching and documenting the origin of these QA licensing bases was to be provided by August 25, 1995. Duke's schedule for submitting the conclusions of this research is May 6, 1996.

Duke's plan for clarifying the remaining items includes the following steps:

- For each potential QA-1 commitment, perform project-level research on all relevant NRC correspondence, Duke correspondence, licensing documents, internal memos, design information, vendor information, etc., to understand the full context of the issues.
- Using this research, perform a project-level determination of whether each item represents a QA-1 commitment.
- Have experienced personnel from each engineering discipline review this preliminary list of QA-1 commitments.
- Following a project-level investigation of any questions posed by the reviewers, develop a finalized list of QA-1 commitments.
- Submit the list of QA-1 commitments (not already listed in the July 10, 1995 letter) to the NRC.

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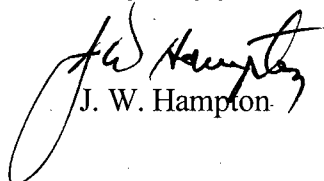
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In addition to the work described above, Duke plans to document the specific boundaries of all Oconee QA-1 commitments. This will assure consistent identification of components that are subject to the QA-1 program. QA-1 boundaries will be described in a document similar to a design basis document. This will provide a clear basis for clarifying present or future QA-1 determinations.

A significant effort is being made both by Duke and the NRC to enhance current interpretations regarding the scope of Oconee's QA-1 program. The tasks described above are expected to clarify the scope of every Oconee QA-1 commitment. If there are any questions regarding this letter, David Nix can be contacted at (803) 885-3634.

Very truly yours,


J. W. Hampton

DAN

NRC Document Control Desk
August 25, 1995
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