

# CATEGORY 1

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SUBJECT: Forwards revised listing of QA-1 commitments added since original licensing basis of plant established.

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**DUKE POWER**

May 6, 1996

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

Please find attached a revised listing of QA-1 commitments Oconee has added since the original licensing basis of Oconee was established.

In Attachment 3 of a letter 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 subject to Appendix B of 10 CFR 50. In a followup letter dated July 10, 1995, Duke provided a list of QA-1 commitments that were added since the original licensing basis. Duke also noted in the July 10, 1995, letter that it would provide a revised list based on additional research and evaluation. By letter dated August 25, 1995, Duke committed to providing the revised list by May 6, 1996. The revised list is transmitted as Attachment 1 of this letter, which supersedes the July 10, 1995, letter.

Duke has performed a detailed review and made a thorough effort to ascertain all affirmative commitments to apply the 10 CFR 50 Appendix B QA program to Oconee structures, systems, and components. Please recognize that not every safety-related reference made on the docket constitutes a QA-1 commitment. Duke applied judgment in the review of each instance; those that represent commitments are included in Attachment 1 and the other instances are excluded. Also included are Attachment 2, which is a clarification of definitions used in the April 12, 1995, letter referenced above, and Attachment 3, which provides additional comments regarding QA classification.

Since the July 10, 1995, submittal, no further major QA-1 commitments were identified by the Duke review. However, the scope of several items from the July 10, 1995, list were expanded or edited for greater clarity. We also found it appropriate to make one new commitment (Item #14), although no commitment had been docketed previously.

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May 6, 1996

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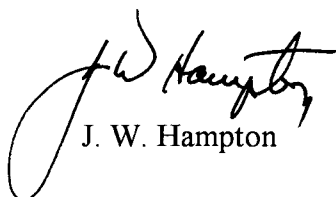
No items included in the July 10, 1995, list (applicable to Docket Nos. 50-269, -270, and -287) have been eliminated. However, a number of items have been consolidated, so Attachment 1 contains 14 items, versus 25 in the July 10, 1995, list. In order to provide ease of traceability, each item in Attachment 1 is cross-referenced back to the July 10, 1995, list. Also, Item 17 from the July 10, 1995, letter regarding the Independent Spent Fuel Storage Installation has been deleted because it applies to a different docket number.

The FSAR will be revised to reflect the QA-1 commitments listed herein.

As noted in the July 10, 1995, letter, the term "QA-1" is used at Oconee to designate those SSCs which must meet the 10 CFR 50 Appendix B quality assurance requirements. It should be emphasized that the QA-1 designation does not constitute a commitment to impose any particular nuclear safety related design requirements.

If there are any questions regarding this document, please contact David Nix at (803) 885-3634.

Very truly yours,



J. W. Hampton

Attachments

cc w/ att:

Mr. S. D. Ebnetter, Regional Administrator  
U. S. Nuclear Regulatory Commission, Region II

Mr. D. E. LaBarge, Project Manager  
Office of Nuclear Reactor Regulation

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

Attachment 1

QA-1 Structures, Systems, and Components Added  
to the Original Oconee Licensing Basis

1. The following portions of the emergency feedwater (EFW) system are QA-1:
  - the motor-driven (MD) EFW pumps
  - the piping from the MD EFW pumps to the steam generators
  - the EFW flow control valves (excluding the operators)
  - the power supply to the MD EFW pumps and controls
  - piping from the upper surge tanks (USTs) to the MD EFW pumps
  - UST level monitoring circuitry and associated solenoid valves
  - EFW flow transmitters upstream of the flow control valves
  - MD and turbine-driven EFW pump initiation signals

(Addressed in the July 10, 1995, letter as Items 1, 3, 7, and 8.)

References

Letter to Nuclear Regulatory Commission (NRC), dated April 25, 1979, re: EFW system improvements.

Letter to NRC, dated May 5, 1979, re: system concept for addition of motor-driven EFW pumps.

Letter to NRC, dated May 17, 1979, re: system concept for addition of motor-driven EFW pumps.

Letter to NRC, dated October 18, 1979, re: response to NUREG-0578.

Letter to NRC, dated November 21, 1979, re: additional response to NUREG-0578.

Letter to NRC, dated July 23, 1980, re: EFW design description.

Letter from NRC, dated August 2, 1994, re: Engineering Self Assessment for 5-1-93 to 6-30-94

2. The anticipatory reactor trips on (1) loss of main feedwater and (2) turbine trip are QA-1.

(Addressed in the July 10, 1995, letter as Item 2.)

References

Letter to NRC, dated April 26, 1979, re: additional information on EFW improvements.

Letter to NRC, dated May 21, 1979, re: system design description for safety-grade anticipatory reactor trip system.

SER from NRC, dated April 15, 1996, re: Tech Spec Amendments regarding deletion of MFDW discharge header pressure switches

3. The following instruments are QA-1 per the Duke response to Regulatory Guide 1.97:

- Two channels of wide range Reactor Coolant System (RCS) pressure
- 24 core exit thermocouples (12 per train)
- Two channels of pressurizer level (one per train)
- Two channels of saturation margin (one monitoring loop A and the core, the other monitoring loop B and the core)
- Two channels of steam generator (SG) level per SG (0-388" range)
- Two channels of SG pressure per SG
- Two channels of borated water storage tank level
- Two channels of high pressure injection (HPI) flow
- Two channels of low pressure injection (LPI) flow
- Two channels of Reactor Building spray flow
- Two channels of Reactor Building hydrogen concentration
- Two channels of upper surge tank level (one per tank)
- Two channels of full range neutron flux
- Two channels of wide range RCS hot leg temperature (one per loop)
- Two channels of reactor vessel head level
- Two channels of hot leg level (one per loop)
- Two channels of wide range Reactor Building sump level
- Two channels of Reactor Building pressure
- One channel of valve position for each electrically-controlled Reactor Building isolation valve
- Two channels of high range Reactor Building radiation level
- Two channels of EFW flow per SG
- One channel of low pressure service water (LPSW) flow to the LPI coolers (per cooler)

(Addressed in the July 10, 1995, letter as Items 3, 4, 5, 6, 9, 11, 14, 15, 16, 20.)

#### References

- Letter to NRC, dated October 18, 1979, re: response to NUREG-0578.
- Letter to NRC, dated January 2, 1980, re: NUREG-0578 implementation status.
- Letter to NRC, dated January 31, 1980, re: response to NUREG-0578.
- Letter to NRC, dated August 25, 1983, re: Reactor Vessel Hot Leg / Reactor Vessel Head Level Monitoring System.
- Letter to NRC, dated September 28, 1984, re: Revision 6 to the Duke Power Company Response to Supplement 1 to NUREG-0737 for Oconee Nuclear Station.
- Letter to NRC, dated October 20, 1986, re: Response to Generic Letter 86-05.
- Letter to NRC, dated April 29, 1993, re: Regulatory Guide 1.97.

4. The RCS hot leg and reactor vessel high point vents (piping, valves, and power supplies) are QA-1.

(Addressed in the July 10, 1995, letter as Item 10.)

References

Letter to NRC, dated January 2, 1980, re: response to NUREG-0578.

Letter to NRC, dated March 26, 1982, re: response to NUREG-0737.

5. Duke has made explicit QA-1 commitments for the following portions of the Standby Shutdown Facility:

SSF reactor coolant emergency makeup piping and components

SSF auxiliary service water piping and components

SSF cooling water piping for the diesel generator and HVAC

Duke is taking the position that all portions of the SSF required for mitigation of a seismic-induced Turbine Building flood shall be QA-1.

(Addressed in the July 10, 1995, letter as Item 12.)

References

Letter to NRC, dated June 19, 1978, re: Oconee SSF Conceptual Design.

Letter to NRC, dated February 16, 1981, re: Oconee SSF - Request for Additional Information.

Letter to NRC, dated March 31, 1981, re: Oconee SSF - Request for Additional Information.

Letter to NRC, dated April 13, 1981, re: Oconee SSF - Request for Additional Information.

Letter to NRC, dated September 20, 1982, re: Oconee SSF - Request for Additional Information.

Letter from NRC, dated April 28, 1983 re: Oconee SSF Safety Evaluation Report.

6. The Control Rod Drive System AC breakers, DC breakers, and associated undervoltage devices are QA-1.

(Addressed in the July 10, 1995, letter as Item 13 [extended to cover AC components].)

References

Letter to NRC, dated March 21, 1983, re: Response to IE Bulletin 83-04.

7. The power supplies and position indications for valves 2LP-3 and 3LP-3 are QA-1.

(Addressed in the July 10, 1995, letter as Item 18.)

### References

Letter to NRC, dated January 12, 1993, re: Oconee Post-LOCA Boric Acid Concentration Control System.

Letter to NRC, dated July 10, 1995, re: Oconee QA-1 Licensing Basis and Generic Letter 83-28, Section 2.2.1, Subpart 1 Supplemental Response.

8. The equipment installed for the automatic Keowee auxiliary load center transfer modification (described in the December 6, 1993, letter referenced below) is QA-1.

(Addressed in the July 10, 1995, letter as Item 19.)

Note: The reference cited for Item 19 in the July 10, 1995 letter is incorrect. The reference should be the Duke letter dated May 17, 1993, not the Duke letter dated April 29, 1993.

### References

Letter to NRC, dated May 17, 1993, re: Alignment of Keowee Hydro Station Auxiliary Power.

Letter to NRC, dated December 6, 1993, re: Response to NRC question #10 on Technical Specification 3.7 Revision.

Letter to NRC, dated July 10, 1995, re: Oconee QA-1 Licensing Basis and Generic Letter 83-28, Section 2.2.1, Subpart 1 Supplemental Response.

9. The 230 kV Degraded Grid Protection System (DGPS) and the CT-5 DGPS are QA-1.

(Addressed in the July 10, 1995, letter as Item 21.)

### References

Letter to NRC, dated May 8, 1990, re: switchyard degraded voltage issues.

Letter to NRC, dated August 31, 1993, re: 100 kV offsite power source.

Letter to NRC, dated November 29, 1993, re: proposed Technical Specification change of 3/11/93.

Letter to NRC, dated April 12, 1995, re: Oconee QA-1 Licensing Basis and Generic Letter 83-28, Section 2.2.1, Subpart 1 Supplemental Response.

Letter to NRC, dated July 26, 1995, re: proposed Technical Specification change to allow modifications to the DGPS and EGTPS.

Letter to NRC, dated October 3, 1995, re: proposed Technical Specification change of 3/11/93.

10. The suction source for the Low Pressure Service Water (LPSW) System will be QA-1 following planned modifications.

(Addressed in the July 10, 1995, letter as Item 22.)

References

- Letter to NRC, dated May 12, 1994, re: response to Inspection Report (IR) 93-25.  
Letter to Duke, dated March 3, 1995, re: Duke response to IR 93-25; Management Meetings. held on 2-6-95 and 2-24-95.  
Letter to NRC, dated March 9, 1995, re: commitments from 2-24-95 Service Water Systems Operational Performance Inspection meeting.  
Letter to Duke, dated April 5, 1995, re: 2-24-95 meeting summary.  
Letter to NRC, dated December 28, 1995, re: summary of proposed Emergency Condenser Circulating Water System mods.

11. The instrument tubing on the systems that comprise the ECCS are to be reclassified as QA-1.

(Addressed in the July 10, 1995, letter as Item 23.)

References

- Letter to Duke, dated February 23, 1995, re: Management Meeting held on 2-6-95.

12. The pressure transmitters, logic, actuation circuitry, and solenoid valves for the MSLB Detection and FDW Isolation System are QA-1.

(Addressed in the July 10, 1995, letter as Item 24.)

References

- Letter to NRC, dated August 19, 1994, re: supplemental response to IEB 80-04.  
Letter to Duke, dated February 23, 1995, re: Management Meeting. held on 2-6-95.  
Letter to NRC, dated June 14, 1995, re: supplemental response to IEB 80-04.

13. The maintenance and test procedures for certain 6.9 kV and 4 kV switchgear breakers are QA-1. Components that are used in future maintenance on these breakers that may impact the ability to shed non-safety loads are also QA-1.

(Addressed in the July 10, 1995, letter as Item 25.)

References

- Letter to NRC, dated June 7, 1993, re: response to Notice of Violation 93-02.  
Letter to NRC, dated July 14, 1993, re: supplemental response to Notice of Violation 93-02.  
Letter to Duke, dated November 15, 1993, re: adequacy of corrective action.



14. Though not considered a commitment prior to this submittal, Duke is now committing that the two hydrogen recombiner packages and the interfacing piping systems shall be QA-1. This does not include the power supplies, which are instead subject to specific docketed agreements involving load-shed power.

(This item was not addressed in the July 10, 1995, letter.)

References

Letter to NRC, dated February 12, 1986, re: Tech Spec change for the Hydrogen Purge System

Letter to NRC, dated October 20, 1986, re: response to requests for information regarding the hydrogen recombiner system

## Attachment 2

Review of the April 12, 1995, letter from J W Hampton to the NRC revealed the need for the following clarification:

### Regarding Attachment 5, Definition of Safety-Related:

The current NRC definition of safety-related is provided in Attachment 5 to the April 12, 1995, letter. Oconee's definition is clarified in Attachments 1-3 of the April 12, 1995, letter.

## Attachment 3

### Additional Comments Regarding QA-1 Classification at Oconee

No regulatory commitment exists for Duke to treat Oconee Class F piping as QA-1 solely on the basis of its Class F designation. However, Duke has always and expects to continue to treat Oconee Class F piping as QA-1 in the future. This explicit clarification is noted here, for it has been the cause of some confusion both within Duke and for the NRC.