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SUBJECT: Describes approach for revising licensing basis re use of H
 Purge Sys.

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DUKE POWER

October 24, 1996

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

Subject: Duke Power Company
Oconee Nuclear Site
Docket Nos. 50-269, -270, -287
Hydrogen Recombiner and Purge System

Per a September 30, 1996, phone conversation with the NRC Project Manager for Oconee Nuclear Station (ONS), this letter is provided to describe an approach for revising the licensing basis regarding use of the Hydrogen Purge System.

In 1990, a reanalysis of post loss of coolant accident (LOCA) hydrogen generation rates was performed. This reanalysis included the effects of hydrogen generation from aluminum corrosion which had not been included in previous analyses. During the performance of this analysis, it was discovered that hydrogen generation rates would be higher than previously described in the Oconee Updated Final Safety Analysis Report (UFSAR), due to post-LOCA corrosion of aluminum in the reactor building.

As a result, the need for a revision to the UFSAR was identified. A 10CFR50.59 evaluation was performed to evaluate these changes to the UFSAR. The 50.59 evaluation concluded that no unreviewed safety questions existed for the change to the UFSAR. To support the 10CFR50.59 evaluation, some dose analyses were performed for post LOCA conditions in the vicinity of the hydrogen control equipment. It was concluded, as a result of these dose calculations, that radioactivity would collect on the Hydrogen Purge System filters and result in high dose rates around the filters. These high dose rates would prevent proper operation and maintenance of the Hydrogen Purge System during post-LOCA conditions. Therefore, the 50.59 identified the need to revise the Bases of Technical Specification 3.16, and to provide a clarifying interpretation for this Specification. In addition, descriptions of the Hydrogen Purge System were removed from the UFSAR in the 1995 annual update, submitted on June 27, 1996.

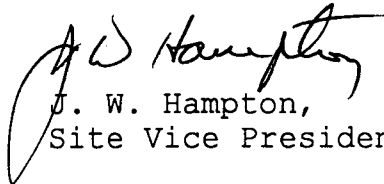
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Technical Specification 3.16 currently includes an option of restoring the Hydrogen Purge System to an operable status, in lieu of shutting down and cooling down, if no hydrogen recombiners are available. The changes proposed by the proposed Technical Specification 3.16 Bases and new interpretation will clarify that use of the Hydrogen Purge System will no longer be provided as an option if hydrogen recombiners are not available. The remaining option of shutting down and cooling down per Specification 3.16.2 will provide a conservative, interim measure, until implementation of the Improved Standardized Technical Specifications (ISTS). The ISTS will convert to the practice of relying only on the Hydrogen Recombiner System at Oconee Nuclear Station (ONS). The ISTS are scheduled for implementation at ONS by the end of 1998.

If there are any questions or further information is needed, you may contact D. A. Nix at (864) 885-3634.

Very truly yours,


J. W. Hampton,
Site Vice President

U. S. Nuclear Regulatory Commission

October 24, 1996

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