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SUBJECT: Informs of commit to perform actions re exam activities planned during upcoming Unit 1 shutdown to HPI sys design basis. Cause of HPI sys nozzle component cracking will be examined.

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DUKE POWER

May 16, 1997

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Justification for Continued Operation of
Oconee Unit 1 as a Result of Oconee Unit 2
HPI Line Leak
Supplemental Information
NRC TAC No. M98454

As agreed upon in the May 15, 1997, telephone conference with the NRC staff, Duke Power commits to perform the actions described in the attachment to this letter. These actions pertain to the examination activities planned during the upcoming Unit 1 shutdown, to the High Pressure Injection (HPI) System design basis, and to examinations of the cause of the HPI System nozzle component cracking.

Please address any questions to D. A. Nix at (864) 885-3634.

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AW1

Very Truly Yours,

J. W. Hampton
Site Vice President

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ATTACHMENT 1
SUMMARY OF COMMITMENTS/ACTIONS FROM
MAY 14, 1997 NRR/DUKE MEETING AND
MAY 15, 1997 NRC/DUKE TELEPHONE CONFERENCE

1. Duke will interface with the NRR staff beginning the week of 5/19/97 to seek agreement on the scope of a HPI System reliability study. Within 15 days after agreement on the scope, Duke will provide a schedule for completion of such a study.

2. Duke will complete a comparison of the field ultrasonic testing (UT) results with the metallurgical lab results of the 2A1 and 3A1 nozzle components inspection no later than May 23, 1997. The intent of this comparison will be to make a judgement of the capability of UT examinations to locate safe end to piping, safe end, and safe end to nozzle flaws.

3. Duke will complete the root cause evaluation of the Unit 2 HPI weld crack.

4. Duke will provide a written response to Questions # 1, 2, and 3 of the eleven HPI System line break questions provided by the NRC on May 13, 1997.

5. NRC Generic Letter (GL) 85-20 documents Duke Power's commitment, along with other utilities, to comply with the recommendations of the "Babcock and Wilcox 177 Fuel Assembly Owner's Group Safe-End Task Force Report on Generic Investigation of HPI/MU Nozzle Component Cracking". This report had specific recommendations for Oconee Units 2 and 3. Duke Power has reviewed some correspondence sent to the NRC in regards to GL 85-20's applicability to Unit 1. Our review of those documents, along with internal correspondence, indicates to us that Duke Power did not conduct the examinations on Unit 1 as we intended to. Duke commits to the following actions on Unit 1.

   a) Duke will perform UT examinations on the HPI nozzle components during the planned Unit 1 shutdown. The Unit 1 shutdown will be commenced on or before June 14, 1997, notwithstanding the conditions of Units 2

and 3. Radiographic (RT) examinations of the sleeve to safe end gap will be performed with water in the HPI System lines. Other RT examinations may be necessary if the results are not of satisfactory quality.

b) If a forced outage of Unit 1 should occur before June 14, 1997, the unit will remain shut down to perform the HPI System nozzle component inspections.

c) Duke will submit a new HPI System nozzle component augmented inspection plan for all three units to the NRC no later than 30 days prior to the scheduled start of the next Unit 1 refueling outage, currently scheduled in September, 1997. Regardless of the Unit 1 refueling outage schedule, this plan will be submitted no later than September 1, 1997.

d) Duke will assess the regulatory significance of the nonconformance with GL 85-20 augmented examination commitments and determine if there are any requirements that require NRC involvement.