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 STOLZ, J.F. Operating Reactors Branch 4

SUBJECT: Forwards response to Generic Ltr 82-05, "Status of Post-TMI Requirements."

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STEAM PRODUCTION

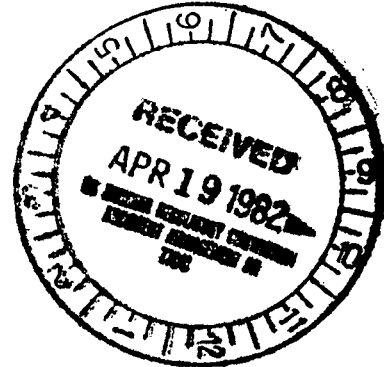
April 16, 1982

TELEPHONE: AREA 704
373-4083

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. J. F. Stolz, Chief
Operating Reactors Branch No. 4

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287

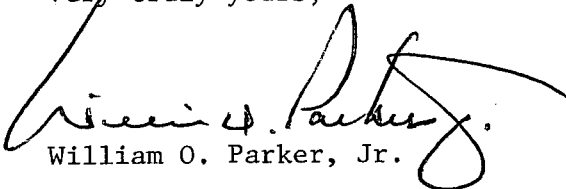


Dear Sir:

By letter dated March 17, 1982, the Staff requested specific information regarding the status of completion of certain NUREG-0737 items scheduled to be implemented between July 1, 1981 and March 1, 1982. Attached please find a tabulation of the status of those items listed in Enclosure 1 in your letter.

I declare under penalty of perjury that the statements set forth herein are true and correct to the best of my knowledge, executed on April 16, 1982.

Very truly yours,


William O. Parker, Jr.

RLG/php
Attachment

cc: Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Mr. W. T. Orders
NRC Resident Inspector
Oconee Nuclear Station

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Duke Power Company
Oconee Nuclear Station

Attachment 1

Response to NRC Generic Letter 82-05
Status of Post-TMI Requirements

Duke Power Company
Oconee Nuclear Station

Response to NRC Generic Letter 82-05
Status of Post-TMI Requirements

<u>ITEM</u>	<u>STATUS</u>
I.A.3.1 Simulator Exams	Complete 10/01/81
II.B.2 Plant Shielding	Part A: Lead Shielding behind Control Rooms Unit 1 - Complete ~ 12/01/81 Unit 2 - Complete ~ 04/01/81 Unit 3 - Complete ~ 08/01/81 Part B: Relocation of valve Unit 1 - Complete ~ 01/01/82 Unit 2 - 90% complete; projected completion ~ 05/01/82 Unit 3 - This item will be implemented during the forthcoming refueling outage scheduled to start in May 1982. Justification for delay provided in Attachment 2.
II.B.3 Post Accident Sampling	Unit 1 - All in-containment portions are complete. Due to material delays the modification is not fully operational. Expected completion date is June 30, 1982. Justification for delay provided in Attachment 2. Unit 2 - All in-containment portions of this modification will be completed by the end of the current outage. Expected completion date of entire modification is September 30, 1982. Justification for delay provided in Attachment 2. Unit 3 - This modification is partially installed with full implementation expected during the forthcoming refueling outage scheduled to start in May 1982. Justification for delay provided in Attachment 2.

<u>ITEM</u>	<u>STATUS</u>
II.B.4 Training for Mitigating Core Damage	Complete for all operations personnel 09/25/81
II.E.1.2 Auxiliary Feedwater Initiation	Unit 1 - Complete ~ 12/01/81 Unit 2 - Complete ~ 04/01/81 Unit 3 - Complete ~ 08/01/81
Flow Indication	Unit 1 - Complete ~ 12/01/81 Unit 2 - Complete ~ 04/01/81 Unit 3 - Complete ~ 08/01/81
II.E.4.2 Containment Isolation Dependability	Part 5: Complete as addressed by NRC letter to DPC dated 07/15/81 Part 7: Considered to be complete as addressed by DPC letter to NRC dated 01/02/81
II.F.1 Accident Monitoring (1) Install noble gas effluent monitors	The monitors were installed; however, due to erratic indications they have been returned to the vendor for modification. Thus, the system is not operable. Schedule to complete this modification is unknown. It will be provided when determined.
(2) Provide capability for effluent monitoring of iodine	Complete - This item was originally identified as NUREG-0578, Item 2.1.8.b with a Category A implementation. NRC addressed satisfactory completion by letter dated 04/07/80.
(3) Install in-containment radiation level monitor	Unit 1 - Not complete. Expected completion next refueling outage. Justification for delay provided in Attachment 2. Unit 2 - This item is in the process of being implemented during the current refueling outage with expected completion by 05/01/82. However, a recently identified cable installation problem, inside containment, may require delay of the completion to some later date. The staff will be kept advised of the resolution of this problem.

ITEMSTATUS

- Unit 3 - This item will be implemented during the forthcoming refueling outage scheduled to start in May 1982. Justification for delay provided in Attachment 2.
- (4) Provide continuous indication of containment pressure
- Unit 1 - Complete ~ 01/01/82
- Unit 2 - This item will be implemented during the current refueling outage with expected completion by 05/01/82.
- Unit 3 - This item will be implemented during the forthcoming refueling outage scheduled to start in May 1982. Justification for delay provided in Attachment 2.
- (5) Provide continuous indication of containment water level
- Unit 1 - Complete ~ 01/01/82
- Unit 2 - Complete ~ 04/16/82
- Unit 3 - This item will be implemented during the forthcoming refueling outage scheduled to start in May 1982. Justification for delay provided in Attachment 2.
- (6) Provide continuous indication of hydrogen concentration in containment
- Unit 1 - This item was complete on 01/01/82 with one exception. The Conoflow Pressure Regulators in the analyzer were defective and are in the process of being replaced. LER 50-269/82-08 provides details. Justification for delay provided in Attachment 2.
- Unit 2 - This item is in the process of being implemented during the current refueling outage with expected completion by 05/01/82. However, a problem exists with the seismic grout base for mounting the analyzer. This problem is in the process of being resolved. If the problem is not corrected prior to startup, it will be accomplished with the unit operating.
- Unit 3 - This item will be implemented during the forthcoming refueling outage scheduled to start in May 1982. Justification for delay provided in Attachment 2.
- II.K.2.10 Install Anticipatory Reactor Trips
- Unit 1 - Complete ~ 12/01/81
- Unit 2 - Complete ~ 04/01/82
- Unit 3 - Complete ~ 04/01/81

Items II.K.3.15, .19, .22, .24, .27 are not applicable to Oconee Nuclear Station.

Duke Power Company

Oconee Nuclear Station

Attachment 2

Justification for Delayed Implementation
of Selected NUREG-0737 Items

With regard to the modifications discussed in this Attachment, the following points apply:

1. The equipment modifications are being provided to cover incidents in excess of design basis accidents.
2. Many of these modifications will not mitigate the consequences of an accident, but will only provide additional information to the operator on plant status.
3. The design basis accident generates little hydrogen; however, plant procedures provide for purging through the hydrogen recombiners whenever a LOCA condition occurs.
4. The existing equipment is capable of providing the necessary information for design basis accidents.
5. There is only a low probability of an accident beyond design basis events during the requested extension.

By letter dated August 3, 1981, Duke provided a justification for delayed implementation of selected NUREG-0737 items for Oconee 3. The justification and schedule provided remain valid.

Item 1 - Plant Shielding, Relocation of Valve

Implementation of this item requires that the unit be in a shutdown condition. The design was not available for installation during the last refueling outage, but all materials and engineering are available to support installation during the forthcoming outage. In the interim, due to the low likelihood of a DBE, compensatory measures are not considered to be necessary.

Item 2 - Post Accident Sampling System

As a result of design revisions, manpower limitations and material delays, this modification is not complete. The present sampling equipment in service is located in the auxiliary building, near the service elevator lobby. Using specific shielding and limited access to the auxiliary building during sampling, this system can be used to sample highly radioactive nuclear coolant water. The station health physics group established specific procedure requirements as needed to obtain samples in a post accident mode.

Item 3 - High Range Reactor Building Radiation Monitor

My letter dated July 23, 1981 discusses delays in qualification of the selected equipment and the decision not to install the instrument until it passes the qualification testing. By letter dated December 29, 1981

Duke stated that qualified components had been obtained and that the modification would be installed by the end of the next refueling outage for Unit 1.

The present instrumentation that is in service is four area radiation monitors and one airborne radiation monitor. None are safety grade or environmentally qualified. One requirement of NUREG-0737 is that the airborne monitor have a range of up to 10^5 mCi/cc. Per NUREG-0592, our present monitor is rated up to 10^3 mCi/cc, which is among the highest in the country. In addition to this equipment, there are two corridor area monitors in service. These would be utilized if the reactor building monitors become inoperable.

Item 4 - Wide Range Reactor Building Pressure Instrumentation

For Unit 3, the design is completed. No installation work has been done. An outage is required in order to implement the item. At present, there are 3 safety grade ES channels in operation with a range of -15 psig to +15 psig. In addition, there is a non-safety grade transmitter with a range of -15 psig to +70 psig. All instrumentation is in the penetration room and is environmentally protected.

Item 5 - Wide Range Reactor Building Water Level Instrumentation

For Unit 3, the design is complete. No installation work has been done. Most of the work is in the containment sump and, thus, an outage is required. At present, there are two transmitters in service with a maximum range of 0-120" H₂O. These transmitters are non-safety grade; however, the implications of loss of the exact water level in the sump in the post accident mode are minimal.

Item 6 - Hydrogen Analyzer System

For Unit 3, the design is complete. No installation work has been done. An outage is required to do the work in the containment. At present, there are no automatic instruments available to analyze for hydrogen in containment. Manual samples can be obtained and tested. Station procedures require that the portable hydrogen recombiner is to be connected to the reactor building in cases of emergency and will be operated to maintain a safe level of hydrogen concentration. Implementation of this item is contingent upon timely resolution of the defective regulator identified in LER 50-269/82-08.