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 STOLZ, J. F. Operating Reactors Branch 4

DOCKET #
05000269

SUBJECT: Comments on "Audit of Oconee Procedures & Training for Pressurized Thermal Shock," including Sections 2.1.3.1, "Reactor Coolant Pumps," 2.1.3.5, "Thermal-Hydraulic Analysis" & 4, "Recommendations."

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November 12, 1982

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

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

Subject: Oconee Nuclear Station, Unit 1
Docket No. 50-269

Dear Sir:

By letter dated October 1, 1982, the Staff provided a copy of the report, "Audit of Oconee Procedures and Training for Pressurized Thermal Shock", and requested comments. Duke has reviewed the report and, while the NRC requested comments only on Section 4.0, we have provided comments on several other sections.

In Section 2.1.3.1, Reactor Coolant Pumps (RCPs), the statement is incorrect as written. It should read, "the RCPs are tripped upon ES actuation when the primary system pressure falls to 1500 psig."

In Section 2.1.3.5, Thermal-Hydraulic Analysis, the statement is made for the Oconee Pressurized Thermal Shock Analysis that "for the overcooling transients, there is a lack of detailed sensitivity analysis on these parameters." The reviewer apparently did not recognize the analyses based on zero decay heat, 50 percent decay heat and the analysis at zero power to illustrate sensitivity. Also, the supplemental submittal of April 30, 1982 was not considered.

In Section 3.3.1(4), the 150-day response is DPC-RS-1001.

In Section 4, Recommendations, the Staff states that the training program should provide a thorough understanding of past industry-wide pressurized thermal shock events. Duke suggests that this is inappropriate and really has no technical basis. Only those past events which are relevant to Oconee should be included. To require operators of one plant to have a thorough understanding of past events of other plants is unnecessary and may be detrimental to safe operation. Duke's position is consistent with the recommendation of NUREG-0737, Item I.C.5, Procedures for Feedback of Operating Experience to Plant Staff, and that implementation of the Staff's recommendation is not necessary.

With regard to Recommendation 2, the training program and procedures were reviewed to determine what additional guidance should be provided to the operators and what appropriate changes have been made. Duke implemented specific training to address pressurized thermal shock both for requalification and for licensing operators.

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Mr. Harold R. Denton, Director
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Finally, with regard to providing a better means of tracking cooldown rate and subcooling margin, this is an area that will be included in the planned Control Room design review and upgrade as required by Action Plan Item I.D.1.

Very truly yours,

H.B. Tucker /HSU

Hal B. Tucker

RLG/php

cc: Mr. James P. O'Reilly, Regional Administrator
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Mr. W. T. Orders
NRC Resident Inspector
Oconee Nuclear Station