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 PARKER, W.O. Duke Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H.R. Office of Nuclear Reactor Regulation

DOCKET #
 05000269
 05000270
 05000287

SUBJECT: Comments on draft NUREG-0667, "Transient Response of B&W Designed Reactors." Draft is generic, w/little review of specific plant operating experience. Actions addressing each recommendation will be forwarded by 800630.

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 TITLE: B&W Plant Response re Crystal River Event

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DUKE POWER COMPANY

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WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

May 5, 1980

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. R. W. Reid, Chief
Operating Reactors Branch No. 4

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

Dear Sir:

Duke Power Company has reviewed the draft of NUREG-0667, "Transient Response of Babcock and Wilcox Designed Reactors," and, as a followup to the meeting held with the NRC Staff on April 23, 1980, would like to make the following comments on the document and offer our proposed course of action to follow up on the recommendations contained therein.

NUREG-0667 by its very nature is generic and, due to limited time available to the Staff, has been written with little detailed review of specific plant operating experience and without consideration of the recent plant modification and analytical effort to achieve improved operational safety. In some instances the findings and conclusions provide insufficient basis to support the Staff's recommendations. In other instances, insufficient evaluations have been performed to fully support recommendations for modification to plant systems. While in many cases, valid concerns have been identified by the Staff, we are concerned that insufficient review and evaluation has taken place to fully identify any adverse impacts of the recommended changes. Furthermore, we are concerned that establishment of an arbitrary implementation schedule without sufficient utility input and proper planning would overburden the B&W reactor utilities as a whole and further postpone ongoing efforts in the areas of necessary analyses and modifications.

Duke considers that many of the changes made as a result of TMI, in response to NUREG-0578, IE Bulletin 79-05A, B, C, and other documents issued by the NRC, effectively meet the intent of the concerns raised by the Tedesco Task Force. The Task Force concerns appear to encompass four major areas: (1) reliability of the EFW system; (2) B&W plant sensitivity; (3) reliability and adequacy of instrumentation, including NNI/ICS; (4) and procedures and operator training.

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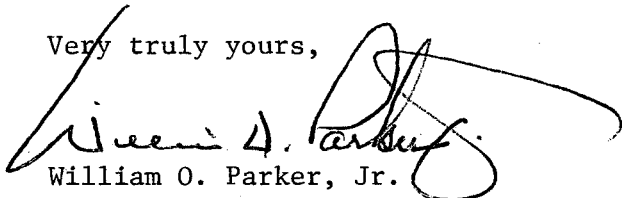
Mr. Harold R. Denton, Director
May 5, 1980
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In each of these areas, we have effected significant improvements and programs are still being pursued to alleviate recognized concerns. For instance, the emergency feedwater system at Oconee has been upgraded significantly in the past year, and a reliability study has been performed and submitted to the NRC for review. Additional modifications to the EFW system are being made as a result of this reliability study. Likewise, the NNI/ICS system has been significantly upgraded, both as a result of our own transient on Oconee 3 last year and the Crystal River 3 transient this past February. Descriptions of the extent of these upgrades have been provided to the Staff and yet, the recommendations of NUREG-0667 do not seem to reflect the current design of Oconee. The ongoing operating experience evaluation program and the ATOG program are intended to identify and to correct, as appropriate, any deficiencies in the plant transient behavior and operator training and procedures.

Duke Power proposes to take positive actions to address each recommendation of NUREG-0667, in a timely manner. We intend to document our actions to the NRC by June 30, 1980. This documentation will address not only the recommendations that have been implemented, but also a realistic course of action and schedule for resolution of any outstanding issues.

It is hoped that this proposed course of actions is acceptable to the Staff. Duke intends to pursue this effort diligently and professionally and we would be pleased to discuss this matter further, if you so desire.

Very truly yours,

A handwritten signature in black ink, appearing to read "William O. Parker, Jr.", with a large, sweeping flourish extending to the right.

William O. Parker, Jr.

RLG:scs