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SUBJECT: Forwards closeout rept for IE Bulletins 79-02 & 79-14.

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October 5, 1989

U. S. Nuclear Regulatory Commission  
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Subject: Oconee Nuclear Station, Unit 2  
Docket No. 50-270  
NRC Inspection Report 50-270/88-23  
IE Bulletins 79-02, 79-14

Gentlemen:

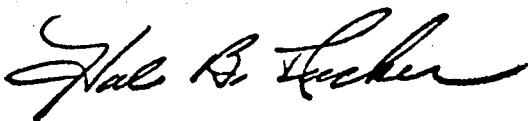
Please find attached the Oconee Nuclear Station, Unit 2 closeout report for IE Bulletins 79-02 and 79-14. This report addresses the Unit 2 portion of the following Inspector Followup Items:

IFI 50-270/88-23-01 Pipe Support Modifications Remaining for IEB 79-02 and 79-14.

IFI 50-270/88-23-02 Final Summary Report for IEB 79-02.

IFI 50-270/88-23-03 Final Summary Report for IEB 79-14.

Very truly yours,



H. B. Tucker

PJN/50/td

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DUKE POWER COMPANY  
OCONEE NUCLEAR STATION  
UNIT 2

Closeout of USNRC I.E. Bulletin 79-02 and 79-14

September 21, 1989

Inspection Report Nos. 50-269, 270, 287/88-23 dated September 8, 1988 closed the above referenced I.E. Bulletins and identified three new open items. This response is intended to satisfy the requirements of these open items for Unit 2 as follows:

1. IFI 50-270/88-23-01, Pipe Support Modifications Remaining for IEB 79-02 and 79-14.

All modifications required on piping and supports have been completed in Unit 2 at Oconee Nuclear Station.

2. IFI 50-270/88-23-02, Final Summary Report for IEB 79-02.

Revision 5 of Duke Power Company's response to I.E. Bulletin 79-02, submitted by letter dated October 8, 1982<sup>9</sup>, stated that all expansion anchor and/or pipe support modifications necessary to satisfy solely the requirements of I.E. Bulletin 79-02 had been completed at that time. Currently, all expansion anchor and/or pipe support modifications which were deferred to I.E. Bulletin 79-14 from I.E. Bulletin 79-02 have been completed.

3. IFI 50-270/88-23-03, Final Summary Report for IEB 79-14.

This report completes this outstanding item.

The following is the final summary, by item, of the extent and manner in which Duke Power Company satisfied the requirements of I.E. Bulletin 79-14 Revision 1, Supplements 1 and 2, and the requirements of I.E. Bulletin 79-02 Revision 2.

- Item 1: Identify inspection elements to be used in verifying that the seismic analysis input information conforms to the actual configuration of safety-related systems. For each safety-related system, submit a list of design documents, including title, identification number, revision and date, which were sources of input information for the seismic analyses. Also submit a description of the seismic analysis input information which is contained in each document. Identify systems or portions of systems which are planned to be inspected during each sequential inspection identified in Items 2 and 3. Submit all of this information within 30 days of the date of this bulletin.

Response 1: Duke Power Company submitted a response to Item 1 on August 1, 1979<sup>1</sup>.

Item 2: For portions of systems which are normally accessible, inspect one system in each set of redundant systems and all nonredundant systems for conformance to the seismic analysis input information set forth in design documents. Include in the inspection: pipe run geometry; support and restraint design, locations, function and clearance (including floor and wall penetration); embedments (excluding those covered in IE Bulletin 79-02); pipe attachments; and valve and valve-operator locations and weights (excluding those covered in I.E. Bulletin 79-04). Within 60 days of the date of this bulletin, submit a description of the results of this inspection. Where non-conformances are found which affect operability of any system, the licensee will expedite completion of the inspection described in Item 3.

Response 2: Duke Power Company submitted an updated response to Item 2 on June 11, 1980<sup>6</sup>. This summary completed our response to Item 2.

Item 3: In accordance with Item 2, inspect all other normally accessible safety-related systems and all normally inaccessible safety-related systems. Within 120 days of the date of this bulletin, submit a description of the results of this inspection.

Response 3: Duke Power Company submitted an updated response to Item 3 on June 11, 1980<sup>6</sup>. This summary completed our response to Item 3.

Item 4: If nonconformances are identified:

- A. Evaluate the effect of the nonconformance upon system operability under specified earthquake loadings and comply with applicable action statements in your technical specifications including prompt reporting.
- B. Submit an evaluation of identified nonconformances on the validity of piping and support analyses as described in the Final Safety Analysis Report (FSAR) or other NRC approved documents. Where you determine that reanalysis is necessary, submit your schedule for i(i) completing the reanalysis, (ii) comparisons of the results to FSAR or other NRC approved acceptance criteria and (iii) submitting descriptions of the results of reanalysis.

- C. In lieu of B, submit a schedule for correcting nonconforming systems so that they conform to the design documents. Also submit a description of the work required to establish conformance.
- D. Revise documents to reflect the as-built conditions in plant, and describe measures which are in effect which provide assurance that future modifications of piping systems, including their supports, will be reflected in a timely manner in design documents and the seismic analysis.

Response 4: Duke Power Company submitted an updated response to Item 4 on October 19, 1982<sup>10</sup>. This response stated that the evaluation of the effect of nonconformance upon system operability as required by Item 4A of the bulletin had been submitted with the updated response to Item 2 and 3 on June 11, 1980<sup>6</sup>. In addition this response stated that all analysis was complete and the ongoing modification work is intended to satisfy the requirements of Items 4B, 4C and 4D of the subject bulletin.

The modification work to satisfy the requirements of items 4B and 4C is complete. However, five pipe supports previously identified as requiring modification/installation were inaccessible due to high levels of radiation and were evaluated for long-term operability. One existing pipe support (S/R #2-03A-437B-JEJ-0701), located in the Miscellaneous Waste Hold-up Tank Room is indefinitely inaccessible due to high radiation levels at the support. Using the current loads for this support and the existing configuration, the support was evaluated and determined to be operable and is acceptable for life-of-plant operation as installed. Four proposed new pipe supports are inaccessible due to the high radiation dose associated with their installation. These four pipe supports (anchors) were to be installed in the Letdown Storage Tank Room on piping analysis problems 2-51-08 and 2-51-01 to provide an analytical boundary between seismic and non-seismic piping. Based on evaluation of these piping analysis problems without the four pipe anchors, the piping is installed such that a seismic event will not cause the operability of the QA Condition 1 piping and valves to be adversely affected by the non-seismic piping. Therefore, the piping is operable and is acceptable for life-of-plant operation as installed.

Updating documents to reflect the as-built condition as required by Item 4D of the subject bulletin has been ongoing with about 1503 of the approximately 1540 supports requiring modification updated. The completed documents reflect the existing conditions found by the I.E. Bulletin 79-14 surveillance, including modifications which were made to the pipe supports since the time of the original surveillance. The remainder of the documents will be updated in accordance with Duke Power's Nuclear Station Modification (NSM) program.

With the exception of the piping and pipe supports noted earlier, which have been evaluated and determined operable for life-of-plant operation as installed, all piping and/or pipe support modifications necessary to satisfy the requirements of I.E. Bulletin 79-14 have been completed and the final document updates are being completed and tracked in accordance with the NSM program.

Attachment I

DUKE POWER COMPANY  
OCONEE NUCLEAR STATION  
Unit 2

References

1. Letter dated August 1, 1979 from Mr. W. O. Parker, Jr., (Duke Power Company) to Mr. J. P. O'Reilly, USNRC, Region II.
2. Letter dated October 29, 1979 from Mr. W. O. Parker, Jr., (Duke Power Company) to Mr. J. P. Reilly, USNRC, Region II.
3. Letter dated November 6, 1979 from Mr. W. O. Parker, J., (Duke Power Company) to Mr. J. P. O'Reilly, USNRC, Region II
4. Letter dated January 24, 1980 from Mr. W. O. Parker, Jr., (Duke Power Company) to Mr. J. P. O'Reilly, USNRC, Region II.
5. Letter dated January 24, 1980 from Mr. W. O. Parker, Jr., (Duke Power Company) to Mr. J. P. O'Reilly, USNRC Region II.
6. Letter dated June 11, 1980 from Mr. W. O. Parker, Jr., (Duke Power Company) to Mr. J. P. O'Reilly, USNRC, Region II.
7. Letter dated October 16, 1981 from Mr. A. C. Thies, (Duke Power Company) to Mr. J. P. O'Reilly, USNRC, Region II.
8. Letter dated February 2, 1980 from Mr. W. O. Parker, Jr., (Duke Power Company) to Mr. J. P. O'Reilly, USNRC, Region II.
9. Letter dated October 8, 1982 from Mr. H. B. Tucker (Duke Power Company) to Mr. J. P. O'Reilly, USNRC, Region II.
10. Letter dated October 19, 1984 from Mr. H. B. Tucker (Duke Power Company) to Mr. J. P. O'Reilly, USNRC, Region II.
11. Letter dated June 21, 1984 from Mr. H. B. Tucker (Duke Power Company) to Mr. J. P. O'Reilly, USNRC, Region II.
12. Letter dated November 21, 1984 from Mr. H. B. Tucker (Duke Power Company) to Dr. J. Nelson Grace, USNRC, Region II.
13. Letter dated February 4, 1988 from Mr. H. B. Tucker (Duke Power Company) to USNRC Document Control Desk, Washington, DC.
14. Letter dated September 8, 1988 from Mr. Alan R. Herdt, USNRC, Region II to Mr. H. B. Tucker (Duke Power Company)