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SUBJECT: Forwards response to NRC 851125 request for addl info re
 B41008 response to Generic Ltr 83-37. Tech Specs re
 operability of RCS will be developed & submitted by 860815.

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Add: RSB (Thomas)

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January 30, 1986

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

Attention: Mr. John F. Stolz, Project Director
PWR Project Directorate No. 6

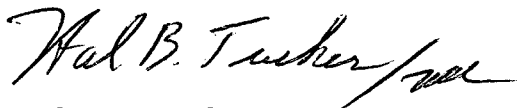
Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287

Dear Sir:

By letter dated November 25, 1985, the NRC requested additional information to complete its review of Duke's October 8, 1984 submittal in response to Generic Letter 83-37. My letter dated December 12, 1985 informed the NRC that a response will be submitted by January 31, 1986.

Attached please find Duke's response regarding the requested additional information for the eight Generic Letter 83-37 items identified in your November 25, 1985 letter.

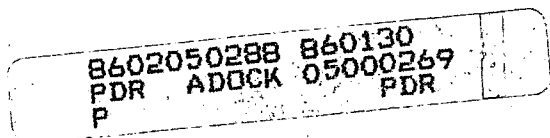
Very truly yours,



Hal B. Tucker

MAH:slb

Attachment



ADD: 258 (Thomas)
A002
1/1

Mr. Harold R. Denton, Director
January 30, 1986
Page Two

cc: Dr. J. Nelson Grace, Regional Administrator
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Region II
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Atlanta, Georgia 30323

Ms. Helen Nicolaras
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. J. C. Bryant
NRC Resident Inspector
Oconee Nuclear Station

Duke Power Company
Oconee Nuclear Station
Response to the NRC Letter Dated November 25, 1985
Request for Additional Information
Generic Letter 83-37, "NUREG-0737 Technical Specifications"

(1) Reactor Coolant System Vents (II.B.1)

"Duke requires periodic testing of the vents as a part of the inservice test program. However, Duke has not provided:

- (1) A limiting condition for valve operability;
- (2) An action statement for the event wherein the missing LCO is not satisfied; nor
- (3) The safety basis as requested in the generic letter.

Duke should provide the technical basis for not providing:

- (1) A LCO with regard to high point vent valve operability;
- (2) An action statement for the event wherein the missing LCO is not satisfied; and
- (3) The safety basis for such an LCO and action statement; or
- (4) Provide the Technical Specification changes suggested in our generic letter."

Response:

As noted in Duke's previous response dated October 8, 1984, the present Oconee Technical Specifications addresses the inservice testing of ASME pumps and valves including the RCS vent valves in accordance with Section XI. The Technical Specifications, however, do not provide any limiting condition and action statement for high point vent valve operability.

Duke will develop and submit by April 15, 1986 technical specifications addressing the operability of the reactor coolant system vents to meet the intent of Generic Letter 83-37. Please note that technical specifications for PORV were submitted to the NRC by a Duke Power letter dated August 15, 1984.

(2) Noble Gas Effluent Monitors (II.F.1.1.)

"Duke should provide an action statement in Technical Specification 3.5.6 requiring institution of an alternative Noble Gas Monitoring program within 72 hours or the failure of both of the Noble Gas Monitors. Otherwise, Duke should provide the technical basis for not providing the suggested alternative monitoring. As part of this basis, Duke should describe the features and procedures that provide an equivalent level of protection for the public health and safety."

Response:

Duke will submit revised technical specifications by April 15, 1986 to meet the intent of Generic Letter 83-37 for this item.

(3) Containment High-Range Radiation Monitor (II.F.1.3)

"In response, Duke proposed Technical Specification 3.5.6. As noted previously, proposed Technical Specification 3.5.6 is more liberal than the guidance given in the generic letter. In this instance, Duke specifies 30 days as compared to the NRC recommendation of 14 days to prepare a special report.

In addition, Duke has specified neither a setpoint nor a methodology for selecting such a setpoint so as to avoid spurious alarms. Although the more liberal reporting requirement, by itself, does not present a significant increased risk; the lack of setpoint methodology and, therefore, meaningful radiation alarms may.

Duke should provide a Containment High-Range Monitor Alarm Setpoint Technical Specification or describe how other plant procedures determine an alarm point that provides both a suitable warning and precludes spurious alarms."

Response:

The containment high-range radiation monitor (RIA-57, 58) setpoints are 440 R/hr for high alarm and $2.1E4$ R/hr for alert alarm. These setpoints are determined by procedures based on dose projection.

The high alarm setpoint is based on the dose rate necessary inside the containment building to reach protective action guide level (EPA-520/1-75-001) of 5 Rem Throid projected dose at the site boundary (1 mile). This setpoint was calculated using worst case meteorology conditions and a design basis leak rate.

The alert alarm setpoint is based on NUREG-0654 emergency action level of 50 mR/hr to the whole body for 30 minutes for a Site Area Emergency classification. This setpoint was calculated using adverse meteorology conditions and a design basis leak rate.

The containment high-range monitors are tested and calibrated to assure their operability. The surveillance requirements for these monitors are described in Duke's submittal of October 8, 1984.

(4) Containment Pressure Monitor (II.F.1.4)

"The Technical Specification should be amended as requested in GL 83-37 to include an appropriate LCO or Duke should provide the technical basis for not having the suggested amendment."

Response:

Containment pressure monitors are not required for mitigation of design basis accidents, since actuation of containment protection systems is automatic and already covered by Technical Specifications. Furthermore, actuation of Engineered Safeguards (ES) Channels 5 & 6 and 7 & 8 would provide some containment pressure information to the operators. The safety grade pressure monitors which feed the ES are totally separate from the containment pressure monitors. The information from these monitors is available to the operators through plant computers.

Considering the preceding discussion and the available information from ES pressure monitors, Duke feels that the proposed technical specification for this item meets the intent of the Generic Letter 83-37. Furthermore, the containment pressure monitors are not required to mitigate design basis events. The temporary inoperability of the equipment does not justify requiring a plant transient (shutdown).

(5) Containment Water Level Monitor (II.F.1.5)

"The Technical Specifications should be amended to require a hot shutdown if Containment Level Monitors are out of service for more than some reasonable period of time. The definition of this reasonable period should be supported by a description of alternative methods for establishing plant conditions and trends and an identification of the emergency operating procedures that would supplant the normal operating procedures for the interim. Duke should also describe the training that has been given to the operators for this degraded instrumentation and display condition."

Response:

Duke will develop and submit by April 15, 1986 appropriate technical specification to address the intent of Generic Letter 83-37 with respect to this item.

(6) Containment Hydrogen Monitor (II.F.1.6)

"In this instance, there are an additional seven days permitted before filing a special report with the Commission and there is no 72 hour limit in operating with both channels out of service. Although the more liberal reporting requirement, by itself, does not present a significant increased risk; the Technical Specifications should be amended to provide the LCO for the Containment Hydrogen Monitors specified in the generic letter. As an alternative, Duke should provide a basis for determining that these monitors are not required for the protection of the public health and safety."

Response:

As described in Section 15.16 of the Oconee FSAR, for the design basis hydrogen generation event, reduction of the containment hydrogen is not required until more than a month after the event. This is the time at which the containment hydrogen concentration will reach the control limit of 3.5 volume/percent. That is enough time to return any inoperable hydrogen monitor to an operable status and is consistent with the requirements of the proposed technical specification.

The containment hydrogen monitors, although provide indication of hydrogen concentrations during normal and post-accident conditions, they do not have a safety function in terms of accident mitigation. The containment hydrogen reduction is accomplished by the hook-up and operation of the Containment Hydrogen Recombiner System (CHRS). Presently, Oconee procedures required the hook-up and operation of the CHRS following a hydrogen generation event regardless of the hydrogen monitor indications. Proposed technical specifications governing the operation and maintenance of the CHRS are being developed for submittal in the near future.

Duke believes that the proposed technical specification meets the intent of the Generic Letter 83-37. The continuous function of the containment hydrogen monitors is not essential during the normal operation. For post-accident situations, the containment hydrogen concentration is controlled by the CHRS. However, the proposed technical specification assures that the containment hydrogen monitors will be operable when their function is needed.

(7) Instrumentation for Detection of Inadequate Core Cooling (II.F.2)

"Duke states that it has not completed the implementation of the following studies and hardware modifications therefore, it is premature to propose technical specification changes. We request that you provide a schedule, by unit, for submitting the technical specification for core exit thermocouples and reactor coolant inventory and tracking system.

Response:

Duke will develop and submit technical specifications as related to this Generic Letter 83-37 item within 90 days after installation of the system for all three Oconee units. The installation schedule for all Oconee units was provided to the NRC by a Duke Power letter dated June 4, 1985.

(8) Control Room Habitability Requirements (III.D.3.4)

"In a June 24, 1985 letter you state that technical specifications for this item will be submitted no later than December 1, 1985.

Response:

Duke will develop and submit technical specifications for this item by May 15, 1986.