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SUBJECT: Responds to 870427 request for addl info to complete review of util response to Items 2.1 & 2.2 (Part 1) of Generic Ltr 83-28.

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June 9, 1987

U. S. Nuclear Regulatory Commission  
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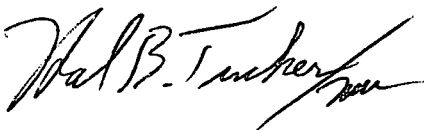
Subject: Oconee Nuclear Station  
Docket Nos. 50-269, -270, -287

Dear Sir:

By letter dated April 27, 1987 the NRC Staff requested additional information to complete their review of Duke Power Company's response to Items 2.1 and 2.2 (Part 1) of Generic Letter 83-28.

Please find attached Duke Power Company's response per your request of April 27, 1987.

Very truly yours,



Hal B. Tucker

MAH/48/sbn

Attachment

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DUKE POWER COMPANY  
OCONEE NUCLEAR STATION

Response To Request For Addition Information  
Items 2.1 And 2.2 (Part 1) Of Generic Letter 83-28  
NRC Letter Dated April 27, 1987

(A) Item 2.1 (Part 1) "Equipment Classification (Reactor Trip System Components)"

The licensee's submittal of August 30, 1985 stated that the identification and listing of reactor trip system components had been completed and identified as safety-related in plant procedures to control and execute safety-related activities. However, the process to identify these components in other related documents was continuing and would be completed by July 31, 1986.

The licensee should confirm that the identification process has been completed.

Response:

Duke Power Company (Duke) has completed the identification of the reactor trip system components included in the B&W Owners Group listing of reactor trip system components referred to in Duke's response to Item 2.1 dated November 4, 1983. The components that are safety-related are indicated safety-related and/or QA Condition 1 on drawings, operating manuals, work requests, standing work requests, preventive maintenance program and procurement. Documents containing safety-related components in the reactor trip system are identified as follows:

- (1) Drawings are marked Safety-Related or QA Condition 1.
- (2) Operating manuals are marked Safety-Related or QA Condition 1.
- (3) Work requests and standing work requests are marked Safety-Related.
- (4) Preventive maintenance is indicated as Safety-Related.
- (5) Part numbers for procurement are designated "N" for QA Condition 1, Safety-Related.

(B) Item 2.1 (Part 2) "Vendor Interface (Reactor Trip System Components)"

Our review of the licensee's submittals indicates that the licensee has identified an interface with their nuclear steam supply system vendor. However, we are unable to determine that the licensee's vendor interface program encompasses a periodic and continuing feedback mechanism. Item 2.1 (Part 2) states that the vendor interface program shall include periodic communication with vendors to assure that all applicable information has been received. The licensee should describe how their program assures that all relevant material is received, properly evaluated, implemented and maintained during the life of the plant.

Response:

Duke's Vendor interface program does encompass a periodic and continuing feedback mechanism as follows:

- (1) A receipt acknowledge form is attached to each technical information package that is sent to Duke from the NSSS Vendor. Duke completes the receipt form and returns to the Vendor to acknowledge receipt of the package.
- (2) Periodically (not to exceed 1 year), the NSSS Vendor sends to Duke lists of all applicable items that have been sent to Duke. Duke compares the Vendor's lists with its own lists and if there is any missing item, Duke will request the Vendor for the missing item.

All relevant material is properly evaluated, implemented and maintained by Duke according to the guidelines of Duke's Operating Experience Program which is administered by the Nuclear Safety Assurance Group in the General Office.

(C) Item 2.2 (Part 1) Equipment Classification (Programs For All Safety-Related Components)

(1) Item 2.2.1 - Program

The licensee's response does not confirm that all safety-related components are designated as safety-related on plant documents such as procedures, system descriptions, test and maintenance instructions, operating procedures, and in information handling systems so that personnel performing activities that affect such safety-related components are aware that they are working on safety-related components and are guided by safety-related procedures and constraints.

The licensee should make the above described confirmation. If all safety-related components are not designated as safety-related on the relevant documents, the licensee should specifically describe the exceptions and provide a justification for such exceptions for staff review.

Response:

Duke confirms that plant documents that have safety-related components in them are marked Safety-Related. These documents include "Oconee Nuclear Station Quality Standards Manual for Structures, Systems and Components", drawings, operating manuals, maintenance procedures, operating procedures, tests, Work Requests and Standing Work Requests.

(2) Item 2.2.1.2 - Information Handling System

The licensee's responses do not confirm that the information handling system includes a list of safety-related equipment and that procedures exist which govern its development and validation.

The licensee should make the above confirmation.

Response:

As detailed in Duke's response to Item 2.2, dated November 4, 1983, Duke's information handling system was shown to have a list of safety-related equipment and that procedures and administrative controls existed to govern its development, validation and utilization. This has just been re-verified and confirmed to be true.

(3) Item 2.2.1.4 - Management Controls

The licensee's response has not confirmed that management controls are utilized to verify that the procedures for preparation, validation and routine utilization of the information system have been followed.

The licensee should make the above confirmation.

Response:

As responded in item 2 above, Duke confirms that management controls are utilized through administrative controls to verify that the procedures for preparation, validation and routine utilization of the information system are and have been followed.

(4) Item 2.2.1.5 - Design Verification and Procurement

The licensee's response does not confirm that their procurement specifications require that the appropriate design verification and qualification testing be provided by the supplier.

The licensee should make the above confirmation.

Response:

Duke confirms that Oconee procurement specifications for safety-related components require that the appropriate design verification and qualification testing be provided by the vendor.