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SUBJECT: Clarifies util responses re identification of safety-related equipment & components on plant documents.

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HAL B. TUCKER
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January 5, 1988

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Generic Letter 83-28, Item 2.2
(Part 1: Equipment Classification Program
For All Safety-Related Components)

Dear Sir:

By letters dated November 4, 1983 and June 9, 1987 Duke Power Company (Duke) responded to the subject Generic Letter 83-28, Item 2.2.1. The NRC Safety Evaluation Report dated November 4, 1987 found Duke's responses to this item acceptable and therefore, considered Generic Letter 83-28, Item 2.2.1 to be complete.

The purpose of this letter is to clarify Duke's responses with regards to the identification of safety-related equipment and components on plant documents. Specifically, Duke's response to Item 2.2.1 dated November 4, 1983 described in general Duke's program for identifying and classifying safety-related equipment and components. This program includes:

- (1) Criteria used to identify safety-related equipment and components.
- (2) An information handling system to identify safety-related equipment and components.
- (3) Criteria and procedures which govern the use of the information handling system.
- (4) Management controls over the information handling system.
- (5) Design verification and procurement qualification for safety-related components and parts.

This program, as reviewed by the NRC, provides assurance that prior to any activities affecting safety-related components, these components are designated as safety-related on applicable plant documents such as procedures, system descriptions, test and maintenance instructions, operating procedures, and information handling systems so that personnel who perform 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.

Duke's letter of June 9, 1987, in response to the NRC request for additional information concerning Item 2.2.1, could be interpreted to imply that all plant documents that have safety-related components in them are marked Safety-Related.

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These documents included Station Quality Standards Manual for Structures, Systems and Components, drawings, operating manuals, maintenance procedures, operating procedures, tests, Work Requests and Standing Work Requests.

Duke's June 9, 1987 response to this item, although accurate in regards to the intent of the program, requires further clarifications as related to plant drawings. Duke's June 9, 1987 response should not be misinterpreted to mean that all of the plant drawings with safety-related components in them are marked Safety-Related or QA Condition 1. The situation arises from the fact that during original plant design, no program existed to require that all drawings showing safety-related components be stamped Safety-Related. In October 1973, the requirement for a Nuclear Safety Related Stamp for safety-related documents was imposed, but was not made retroactive. However, documents were stamped as they were revised. Also, in June, 1980, the requirement for QA Condition 1,2,3, or 4 Stamp was imposed for safety-related documents and again it was not made retroactive. Again, documents were stamped as they were revised. Therefore, safety-related drawings exist in files with no Safety Stamp, Nuclear Safety Related Stamp or QA Condition 1,2,3, or 4 Stamp. Since many modifications have been made to original plant design involving many drawings, only a portion of the Oconee drawings exist with no safety stamp.

Duke believes the present program addresses the staff concern regarding equipment and component classification and meets the intent of the Generic Letter 83-28, Item 2.2.1. This program, in accordance with the guideline described in SER, provides assurance that all safety-related components are designated as safety-related on plant procedures and information handling systems prior to performance of any activities that affect such components.

In addition, as a further enhancement of documents and the information handling system for Oconee, Duke is proceeding with a program to identify drawings with safety-related equipment on them that are not stamped, and stamp them appropriately. This program is independent of the program established to address the requirements of Item 2.2.1 of Generic Letter 83-28.

Very truly yours,



Hal B. Tucker

MAH/1189/sbn

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