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50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287
AUTH.NAME AUTHOR AFFILIATION
PARKER,W.O. Duke Power Co.
RECIP.NAME RECIPIENT AFFILIATION
DENTON,H.R. Office of Nuclear Reactor Regulation
ROSS,D.F. TMI-2 Bulletins & Orders

SUBJECT: Responds to 790821 request re identification & resolution of long-term generic issues related to NRC orders of May 1979. B&W Owners Group effective based on historical & current observation.

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August 31, 1979

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

Attention: Mr. D. F. Ross, Jr., Director
Bulletins and Orders Task Force

Re: Oconee Nuclear Station
Docket Numbers 50-269, -270, -287

Dear Mr. Denton:

With regard to your letter dated August 21, 1979 concerning identification and resolution of long-term generic issues related to the Commission Orders of May 1979, the following information is provided:

1. Failure mode and effects analysis of the Integrated Control System.

   The Integrated Control System Reliability Analysis, submitted by Babcock and Wilcox in a letter dated August 17, 1979 has been reviewed by Duke Power Company. This document is considered to be applicable to the system at Oconee Nuclear Station.

2. Continued operator training and drilling.

   The response to this item will be submitted by September 21, 1979.

3. Upgrade of the anticipatory reactor trip to safety grade.

   No additional information requested.

4. Auxiliary/emergency feedwater system reliability analyses.

   Duke Power Company will participate in the auxiliary feedwater system reliability analyses program proposed by B&W in a letter dated August 16, 1979 from J. H. Taylor to D. F. Ross, NRC. A final report of the results of the analysis for Oconee will be provided by December 3, 1979.

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5. A detailed analysis of the thermal-mechanical conditions in the reactor vessel during recovery from small breaks with extended loss of all feedwater.

   A report of this analysis will be submitted by December 31, 1979.

6. PORV and safety valve lift frequency and mechanical reliability.

   No response requested.

7. Small Break LOCA Analysis.

   The schedule for submission of item 1 through 5 of Attachment A to your letter is as follows:

   Item 1.A. - A report will be provided by December 1, 1979.

   1.B. - A response will be provided by September 30, 1979.

   2.A. - A response will be provided by September 30, 1979.

   2.B. - In response to this item, the following will be provided:
   1. A statement that no small break with auxiliary feedwater will pressurize the system to PORV setpoint will be provided by September 30, 1979.
   2. A qualitative assessment of the transient will be provided by December 30, 1979.
   3. The results of an analysis of the core assuming 0.01 ft^2 break with no AFW will be provided February 1, 1980.

   3.A. - A response will be provided by September 30, 1979.

   3.B. - A response will be provided by October 31, 1979.

   3.C. - A response will be provided by September 30, 1979.

   3.D. - A response will be provided by October 31, 1979.

   4.A. - The TMI analysis already performed which covers the first 100 minutes will be provided by September 30, 1979.

   4.B. - If necessary, the actual analysis specifically requested will be performed by July 1980.

   5. - A response will be provided by September 30, 1979.

   6. - A report of the results of this analysis will be provided by May 1, 1980.

8. Analysis for Loss of Feedwater and other anticipated transients.

Analysis of loss of feedwater and other anticipated transients originally discussed by NUREG-0560, Section 8.4.1 has been expanded and superseded by NUREG-0578, Section 2.1.9. On August 9, 1979 B&W and the B&W Owners Group discussed a conceptual program with the NRC staff to address the Lessons Learned Task Force item. The described program entails the integration of analysis, simulation and plant event response evaluation developing symptom based guidelines for station operators to evaluate abnormal transients. Your letter indicates qualified acceptability of the program. The seven transients selected for preparation extend into all areas of plant response requiring detailed coordination between NSSS vendor and architech engineer equipment as well as the many plant specific interactions that must be considered. To provide this integration and provide a truly meaningful result several details of the program are being further defined that will affect the quality of the evaluation but also impact schedule. Therefore consistent with a discussion between Mr. R. Capra and Arkansas Power and Light Company on August 27, 1979, we will defer submitting a detailed schedule until September 14, 1979.

Your letter also discussed your concerns regarding the present working relationship between the NRC; the five Babcock and Wilcox utilities under the long-term provisions of the Commission Orders of May, 1979; B&W; and the B&W Owners Group. Relative to this matter there appears to exist some misunderstanding as to the role and function of the B&W Owners Group. The "Owners Group" (in this case specifically the TMI-2 Followup Technical Committee) is the collection of the individual affected utilities. The Group is not a legal or financial entity and therefore, as you correctly stated, is indeed not empowered to make commitments for individual member utilities. The Group is however an organization, supported by each utility via its participation therein, which fosters interaction between the utilities, B&W and other organizations such as the NRC for the purpose of defining generic actions where appropriate. As the number of utilities involved is not large (maximum of seven), each member participates directly via one or more representatives and a sub-group (e.g., Steering Committee) is not necessary. In the case of Duke Power Company, a representative participating on the owners group has the same authority and responsibility with regard to reaching agreements and making commitments as that individual would have if dealing unilaterally on the same issue.

Functioning in the manner described above the owners group can serve to expedite resolution of common issues. This has been evidenced by the fact that such has been occurring for several years on a variety of topics—e.g., asymmetric LOCA loads and reactor vessel materials. In each case a generic NRC letter was received by the individual licensees/utilities; an owners committee established and a program of generic action defined with B&W; and work initiated with ongoing involvement by the utilities. Each utility retained the required final

responsibility for its specific unit(s) and the information received from or transmitted to the NRC is properly linked to the applicable dockets.

In summary historical and current observation of the functioning of the B&W Owners Group, and Technical Committees thereof, supports that the organization is effective. I believe that this effectiveness will continue to be evidenced in resolving the various generic nuclear regulatory issues resulting from the accident at Three Mile Island.

Very truly yours,

Willaim O. Parker, Jr.

DCH/RLG/scs