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 RECIPIENT AFFILIATION: Office of Nuclear Reactor Regulation
 REID, R.W.
 Operating Reactors Branch 4

SUBJECT: Provides supplemental info to 790824 response to IEB-79-05C,
 "Nuclear Incident at TMI-Suppl," re revision of emergency
 procedures requiring trip of reactor coolant (RC) pumps upon
 reactor trip & initiation of HPI due to low RC sys pressure.

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VICE PRESIDENT
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December 6, 1979

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

Attention: Mr. R. W. Reid, Chief
Operating Reactors Branch No. 4

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

Dear Mr. Denton:

Our initial response to Item 1 of IE Bulletin 79-05C, submitted by my letter of August 24, 1979, stated that appropriate emergency procedures have been revised to require that upon reactor trip and initiation of HPI caused by low reactor coolant (RC) system pressure, all operating reactor coolant pumps will be tripped. The purpose of this letter is to provide a supplemental response to this item.

In the past few months, several discussions have been held with the Staff and the B&W Owners' Group on this matter and in the particular concern that the action described above may reduce the operators ability to respond to non-LOCA transients. A conceptual design has been provided to the Staff which would cause an automatic trip of RC pump on low RC pressure and low pump power. This is the preferred long term solution. However, in the short term, operator action must be relied upon.

In a meeting held with the Staff on November 8, 1979, a description of operator actions was provided which allows the operator to manually initiate additional HPI prior to automatic HPI initiation. Additionally, subcooling is monitored to assure adequate core cooling at any pressure. Existing Oconee procedures provide for the operator to manually start the standby HPI pump in the case of excessive RC system leakage, that is, upon decreasing RC system pressure or pressurizer level, operators are instructed by procedure to manually increase makeup to the RC system by starting the standby HPI pump and opening the 'A' loop injection valve. Operators are instructed by procedure to maintain pressurizer level, RC system pressure, and RC system subcooling. RC system subcooling is continuously monitored to assure sufficient margin.

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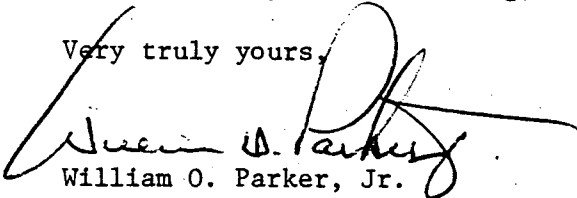
Mr. Harold R. Denton, Director
December 6, 1979
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In order to provide additional operator guidance and to reduce the frequency of RC pumps trip on non-LOCA transients, Emergency Procedures, EP/O/A/1800/4, Loss of Reactor Coolant, and EP/O/A/1800/8, Steam System Leak-Rupture, can be revised to modify the requirements for RC pump trip as follows:

If RC system subcooling cannot be verified or maintained and if Engineered Safeguards (ES) actuate because of low RC system pressure, then the RC pumps should be tripped. Conversely, if RC system subcooling is maintained, the RC pumps are permitted to remain operating even if ES actuates on low RC system pressure.

It is considered that this additional guidance to the operators does not contradict our initial response on this item. In cases where RC pressure is decreasing rapidly and ES automatically actuates without the operator having sufficient time to manually start an additional HPI pump, the RC pumps will be immediately tripped. On the other hand, if RC pressure is decreasing at such a rate that the operator has time to start the standby HPI pump and monitor and maintain RC system subcooling, the RC pumps need not be tripped upon ES actuation.

Very truly yours,



William O. Parker, Jr.

RLG:scs

cc: Mr. J. P. O'Reilly, Director
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