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 FACIL: 50-269 Oconee Nuclear Station, Unit 1, Duke Power Co. 05000269  
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 50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287

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SUBJECT: Advises that excessive downtime for remaining Lessons Learned Task Force requirements during peak winter months is unnecessary. Sequential shutdown of Units 2 & 3 in Feb will be followed by shutdown of Unit 3 by 800531.

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DUKE POWER COMPANY

CHARLOTTE, N. C. 28242

December 17, 1979

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A. C. THIES  
SENIOR VICE PRESIDENT  
PRODUCTION AND TRANSMISSION

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

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

Dear Sir:

This letter is provided as a follow up to our conversation of December 13, 1979. I would like to take this opportunity to reaffirm Duke Power Company's commitment to the safe operation of the Oconee Station; this commitment includes the dedication to apply those lessons learned from the accident at Three Mile Island in an expeditious fashion. With regard to those specific items required in NUREG-0578, Duke has made significant progress in meeting virtually all of the Category A items. As noted in our response dated November 21, 1979, only two items requiring equipment modifications on Units 2 and 3 remain to be implemented after January 1, 1980.

The following background information should be considered as the Staff and the Commission contemplate further action in this area. Duke Power is faced with a unique challenge to implement the requirements of NUREG-0578 for the three Oconee units concurrent with normal refueling outage tasks that have been enormously expanded by NRC requirements arising from IE Bulletions 79-02, 79-14, et cetera. The available support personnel onsite, in the Steam Production Department General Office, the Design Engineering Department, the Construction Department, and outside contractors would have to be divided between these units if concurrent shutdowns are required. Therefore, concurrent shutdowns would significantly extend the cumulative down time. The two remaining NUREG-0578 items on Units 2 and 3 could have been started much earlier had the Unit 1 NRC work not required an extended 75 day outage versus the 30-40 day normal refueling outage. If, as has been discussed, Oconee 2 and 3 are required to shutdown for modification on or before February 1, 1980 it is very likely that the following outages would result.



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- Unit 1      refueling scheduled to end in early-February will be extended to mid-February because of diversion of manpower assuming current scope of work remains unchanged.
  
- Unit 2      refueling scheduled for mid-February will begin February 1 and extend well into April.
  
- Unit 3      An outage to implement required modifications would begin around February 1, 1980 and probably extend into early March rather than the proposed May outage.

This would remove approximately 2600 MW from service during the portion of the month of February, which is a period of high peak usage in our service area. Our reserve levels would range from a deficiency of around 700 MW for the first-half of February to practically no reserves for the last half. This situation would almost certainly lead to power supply shortages for North and South Carolina during February if our expected peaks are reached. Our neighboring utilities are also in peak season and probably won't be in a position to sell significant amounts of power.

Even removing one Oconee unit from service during this winter peak degrades our system, however, we have committed to do this in order to get the remaining items on NUREG-0578 completed on all the Oconee units. During those times when sufficient power can be supplied or purchased it will be produced, in part, with combustion turbine peaking units which utilize expensive and increasingly scarce fuel oil. Replacing one Oconee unit for a week will require 17 million gallons of fuel oil at an increased cost of 12 million dollars. This will remove a large amount of home heating oil from an already limited market doubly penalizing residents of the area by depriving them of needed fuel oil and increasing the cost of both fuel oil and electricity.

By committing to bring Units 2 and 3 sequentially off line in mid-February and sometime during May respectively Duke Power Company feels that we will have reached a workable balance between real power demands and perceived incremental increases in safety of operations. We cannot agree that the two remaining items, diverse containment isolation and PORV/block valve position indication are of such urgency that shutdown of multiple units on peak is justified. In fact, some necessary equipment will not be available until late January. It is the position of Duke Power Company that we have demonstrated a high degree of cooperation and responsiveness to date. I believe that we have provided more than sufficient justification for you to concur with our proposed implementation schedule. We urge that consideration be given to Duke's unique situation and that Duke be allowed the flexibility of sequential shutdown with Unit 3 to be removed from service no later than May 31, 1980. Any other action would appear arbitrary and

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would penalize both Duke and its customers. We appreciate the challenge of your position in these times and offer our continued support.

Very truly yours,



A. C. Thies

ACT:scs