

April 13, 1999

LICENSEE: Duke Energy Corporation (Duke)

FACILITY: Oconee Nuclear Station, Units 1, 2, and 3

SUBJECT: SUMMARY OF APRIL 1, 1999, PHONE CALLS BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION (NRC) STAFF AND DUKE REPRESENTATIVES TO DISCUSS THE OCONEE LICENSE RENEWAL APPLICATION

On April 1, 1999, representatives of Duke had phone calls with the NRC staff in Rockville, Maryland, to discuss the Oconee license renewal application. The purpose of the phone calls was to discuss questions that the staff had regarding fire protection. Enclosures 1 contains the staff's questions. The Duke participants were Bob Gill, Greg Robison, Paul Colaiani, and Mike Semmler. The staff participants were Tanya Eaton and Joe Sebrosky.

Duke provided verbal answers to the questions that the staff asked. A summary of these answers can be found in the Duke response portion of Enclosure 1. The staff stated that if any additional information is required, it will identify the information in a future call, or in the safety evaluation report for the Oconee license renewal application.

A draft of this meeting summary was provided to Duke to allow them the opportunity to comment on the summary prior to issuance.

Original Signed By

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Docket Nos. 50-269, 50-270,
and 50-287

Enclosure: As stated

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Fire Protection Questions
Phone call of April 1, 1999

Staff question 1

The applicant highlighted components on the flow diagrams to show which components are within scope of license renewal. Then on a separate list in Table 2.5-25, they identify these components and their intended functions. Some of the components which were highlighted on the flow diagram, were not included on this list.

Example:

(a) Section 2.5.14.1 - Air Intake and Exhaust System (OLRFD -137D-1.3, Vol. 3) - The turbo charger turbine pump casing, which is within the scope of license renewal, is not identified as an intended function on Table 2.5-25.

Duke response

Duke stated that the turbo charger is considered to be within scope of license renewal, however, an aging management review was not performed on this component. Duke considers the turbo charger to be part of the diesel generator. The diesel generator is excluded from an aging management review based on 10 CFR 54.4(a)(1)(i).

Staff question 2

On some flow diagrams, the highlighted portions on the flow diagrams did not include components which we think should be within the scope of license renewal, according to the SE's, which show licensee commitments to provide certain FP equipment.

Examples:

(a) Section 2.5.14.2 - Diesel Generator Fuel Oil System (OLRFD -135A-1.2, Vol. 3) - The purpose of this system is to supply fuel oil to each diesel engine injector for combustion and fuel cooling. The oil storage tank and the oil day tank are highlighted and shown as within the scope of license renewal, but the piping leading to the injectors is not.

Duke response

Duke stated that the piping leading to the injectors is considered to be within scope of license renewal and therefore should have been highlighted on the drawing. However, an aging management review is not required on the portion of the piping for this system that was supplied by the diesel generator vendor. Duke considers the portion of the piping supplied by the vendor to be part of the diesel generator and therefore excluded from an aging management review based on 10 CFR 54.4(a)(1)(i). Duke stated that the drawings are only a reviewer aid. The text contained in Volume I, II, and III of its license renewal application is consistent with the position that an aging management review is not required on the portion of the diesel generator provided by the vendor.

Staff question 2b

Section 2.5.14.3 - Drinking Water System (OLRFD -126B-1.1, Vol. 3)- The SSF Water Storage Tank is not highlighted to show that it's within the scope of license renewal. Their April 28, 1983 SE, Section 2.4.4 shows this as a part of the SSF which is provided for this system. I don't understand why it is excluded from being within scope.

Duke response

Duke stated that Note 5 of the drawing indicates that the SSF Water Storage Tank does not meet any of the scoping criteria of 10 CFR 54.4. The small portions of the drinking water system that were considered to be within scope of 10 CFR 54.4 met the criteria of 10 CFR 54.4 (a)(2). That is, a portion of the drinking water system is a non-safety-related system, whose failure could prevent satisfactory accomplishment of any of the functions identified in 10 CFR 54.4 (a)(1)(i), (ii) or (iii).

Staff question 2c

Section 2.5.14.7 - SSF Aux. Service Water System (Sump) (OLRFD -133A-2.5, Vol. 3)- All portions of this system are included within the scope of license renewal except for the SSF bldg. sump. In the April 28, 1983 SE, Section 2.4.3, the sump is listed as a system within the SSF and according to scoping criteria, should be included within scope of license renewal.

Duke response

Duke noted that a portion of the sump is within scope of license renewal. Duke stated that the portion that is within scope is described in response to RAI 3.5.14-4. Duke stated that the reason a portion of the piping is within scope is that it is needed to remain intact to prevent an external flood from impacting important equipment in the SSF.

Staff question 2d

Section 2.5.11 - Reactor Coolant Pump Motor Oil Collection System (OLRFD -137D-1.3, Vol. 3)- Some piping lines connected to the RCP motor oil collection tank are not within the scope of license renewal. The staff suspects they are for maintenance, but since they concern the RCP Motor Oil Collection System, which is required by Appendix R under 50.48, we would like to verify that they should not be included.

Duke response

Duke stated that the piping is not highlighted because it is only used for maintenance during refueling outages. The portion that is only used for maintenance is not required by 10 CFR Part 50 Appendix R, and therefore is not within scope of license renewal.

Staff question 3

For Section 2.5.14.8, Starting Air System, drawing OLRFD-137D-1.1, has portions missing so that you can't tell what is included within the scope of license renewal. If you compare to OLRFD-137D-1.2, Volume 3, this is the Unit 2 drawing for the same system. But they are slightly different.

Duke response

Duke stated that all the drawings were individually made using a plotter (i.e., they were not copies). The staff was supplied with 7 set of these drawings. Duke suggested that the staff look at another set of the drawings to determine if this was simply a plotter malfunction for this particular drawing. When the staff reviewed another set of drawings it showed the missing portions and the staff was able to determine what is included within the scope of license renewal.

Regarding the portion of the Starting Air System that is within scope of license renewal, Duke noted that the same methodology was used for this system as was used for the diesel fuel oil system discussed in question 2a above. That is, Duke considers the Starting Air System leading to the diesel generator to be within scope of license renewal, however, Duke considers the portion of the piping supplied by the vendor to be part of the diesel generator and therefore excluded from an aging management review based on 10 CFR 54.4(a)(1)(i).

Staff question 4

Fire detector insulated cables and connections are excluded from an AMR. The applicant response to NRC Question 2.2-4 (b) states that insulated cables and connections used for fire detectors (which are part of the fire detection system) are determined not to be subject to an AMR. But that all other insulated cables and connections in the Fire Detection System are included in the AMR. I am confused when they say "all other". We still do not understand why insulated cables are excluded from the scope of license renewal.

Duke response

Duke stated that the insulated cables and connections for fire detectors are not subject to an aging management review based on their interpretation of the license renewal rule. Specifically, Duke believes that the statements of considerations (SOC) for the rule allows the fire detection cables to be excluded from an aging management review based on performance or condition monitoring. Duke stated that because testing of the fire detection cables is continuously done any problems with the cable would be self revealing. Therefore, an aging management review is not required. Duke believes that their position is consistent with the SOC's for the license renewal rule regarding testing (60FR22478 second column, second paragraph).

Staff question 5

If you look in Section 4.16 of the LRA, there are two programs which fall under the FP Program, that are credited in the aging management review. It says that there are many activities used to achieve defense-in-depth. However, they only list: Fire Barrier Inspections and Fire Water System Testing.

(a) Are these the only two programs that are credited for FP? See RAI Question 4.16-3.

(b) Anything in the SE's that show commitments to maintain the FP system in accordance with 50.48, are within the scope of license renewal and subject to AMR, unless shown otherwise. For example, there is a carbon dioxide system in the SSF. Using the licensee's logic, since this is a FP system, it should be within scope and subject to an AMR, simply because it is in a FP SE. Yet, no programs are mentioned which demonstrate how aging is managed for this system. Other examples: fire dampers, floor drains, yard fire hydrant flow checks, FP service water pump, battery checks, etc..

Duke response

Duke stated that there is not one system that performs the fire protection function at Oconee. Instead Duke uses various systems to comply with 10 CFR 50.48 Appendix R. Duke stated that Section 3.5 of the license renewal application discusses the aging effects and the many programs used to manage aging.