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SUBJECT: Responds to NRC 881207 ltr re violations noted in Insp Repts
 50-269/88-13, 50-270/88-13 & 50-287/88-13.

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DUKE POWER

January 31, 1989

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Inspection Report 50-269, -270, -287/88-13

Gentlemen:

By letter dated December 7, 1988, the NRC provided the staff evaluation of my response to violations in the subject inspection report. Within the letter, the NRC requested that I resubmit my response to Violation E.2. My letter of January 6, 1988 informed you of the delay in submitting my response. By this letter I am providing the requested response to Violation E.2.

Very truly yours,

A handwritten signature in cursive script that reads 'Hal B. Tucker'.

Hal B. Tucker

PJN/460/mmf

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**Duke Power Company
Oconee Nuclear Station
Reply to a Notice of Violation
Inspection Report 50-269, -270, -287/88-13**

Violation E.2

10CFR50.59(a) (1) allows the holder of a license authorizing operation to make changes to the facility as described in the safety analysis report without prior Commission approval, unless the proposed change involves a change in the Technical Specifications incorporated in the license or an unreviewed safety question. In addition, 10 CFR 50.59(b) (1) states that the licensee shall maintain records of changes in the facility as described in the safety analysis report. These records must include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question.

Contrary to the above, exempt changes (a change to structures, systems, or components that does not require the level of approvals, reviews, schedules, or documentation as a station design modification or a Design Engineering designed modification) used for valve replacements, included determinations that unreviewed safety questions were not involved; however, the bases for these determinations were not documented.

Typical examples include OE-1350, -1218, -1352, -1355, -1347, and -1607. These examples are not intended to be all inclusive.

This is a Severity Level V violation (Supplement I).

Response

1. Admission or denial of the violation:

Upon further consideration of NRC letter dated December 7, 1988 the violation is admitted as stated.

2. Reason for Violation:

Paragraph 5.b of the Inspection Report contains lists of exempt changes for valve replacements. The bases for the determination that no unreviewed safety questions were involved was provided via a brief statement that the replacement component met or exceeded original design specifications and that the component had been approved by Design Engineering.

The Design Engineering evaluations assured that each difference between the existing and replacement valve was reviewed to determine acceptability (based on application, pressure, temperature, weight, etc.). Records of these evaluations did not provide a level of detail sufficient to meet the requirements of 10CFR50.59.

3. Corrective steps which have been taken and the results achieved:

Previous Design Engineering evaluations performed for valve replacement were adequate, although records of these evaluations were too brief. Design Engineering is currently upgrading the valve replacement program such that evaluation records provide sufficient justification to assure that each difference between the existing and replacement valve is acceptable and appropriately documented.

4. Corrective steps which will be taken to avoid further violations:

Exempt changes for valve replacements will be documented in accordance with the upgraded program.

5. Date of full compliance:

The upgraded program for valve replacement exempt changes will be implemented on April 1, 1989.