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ACCESSION NBR: 9706240249 DOC. DATE: 97/06/16 NOTARIZED: NO DOCKET #
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SUBJECT: Informs NRC of util intentions w/re efforts to assure continuing accuracy & completeness of UFSAR for each of Duke nuclear site.

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DUKE POWER

June 16, 1997

U. S. Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555-0001

Subject: Oconee Nuclear Station- Units 1 , 2 and 3
Docket Nos. 50-269, 50-270 and 50-278
McGuire Nuclear Station - Units 1 and 2
Docket Nos. 50-369 and 50-370
Catawba Nuclear Station - Units 1 and 2
Docket Nos. 50-413 and 50-414
Plans for Assuring the Accuracy and Completeness
of the UFSAR

On October 18, 1996, the staff published in the Federal Register an amendment to its Statement of Policy and Procedure for Enforcement Actions to address issues associated with UFSAR related violations.

The purpose of this letter is to inform the NRC of Duke Power's intentions with regard to efforts to assure the continuing accuracy and completeness of the UFSAR for each of Duke's nuclear sites.

Introduction

Duke Power has always understood and placed a high priority on the necessity for an accurate and complete UFSAR. Continuous improvements have been made in our processes and controls for UFSAR review and revisions. In 1996, a process improvement team completed an assessment of the overall UFSAR maintenance process and identified opportunities for strengthening our program. A Nuclear System Directive, "UFSAR Update Process", has been implemented to incorporate these enhancements.

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During the last quarter of 1996, Duke conducted a pilot study of the UFSAR for each site according to guidelines in the NEI 96-05 document. This consisted of a cross-chapter review of several different systems. The purpose of this review was not only to provide input to NEI for the NEI 96-05 initiative, but to help assess if any efforts beyond the normal UFSAR update process should be undertaken.

While the results of the pilot did not identify significant new UFSAR maintenance issues, the number of discrepancies did suggest a broader, one-time effort could be used to effectively improve the UFSARs at Duke facilities.

Duke is therefore initiating a multi-site project, which will consist of an accuracy review in addition to a review of selected licensing basis correspondence for information that should be reflected in the UFSAR for completeness per 10 CFR 50.71(e). This project will be simultaneously conducted and managed at the three Duke nuclear sites.

Oconee is also conducting a project, referred to as the Oconee Safety-Related Designation Clarification (OSRDC) project, to clarify the safety classification of equipment. Part of the OSRDC project has involved a review of accident mitigation functions and their relationship to what is described in the UFSAR. Thus, relevant portions of the OSRDC project are also being considered as part of the UFSAR initiative.

Accuracy Review

This portion of the project will consist of a systematic chapter-by-chapter review of the UFSAR. This effort will require a review of text, as well as tables, figures and cross-references.

The accuracy of each non-historical statement or data piece, will be verified by one or more specified methods. These methods include substantiation by knowledgeable personnel, review of design drawings, calculations, or other authoritative documentation or verification method.

Completeness Review

In this portion of the review, selected docketed correspondence such as License Amendment Safety Evaluation Reports, responses to Generic Letters and Bulletins and NRC Safety Evaluation Reports for other regulatory required

initiatives will be reviewed for information that should have been incorporated into the UFSAR per 10 CFR 50.71 (e). The UFSAR will then be reviewed to verify that it contains this required material.

For Oconee only, due to its early construction and operational date, this review will be taken one step further in that this subset of correspondence will also be examined for any information that should be incorporated into other plant documents such as procedures, program descriptions or design basis documents. The plant documents will be reviewed to verify they contain the required information.

Additionally, the proper level of detail will be verified to be present in the UFSAR compared with applicable Regulatory Standards.

Resolution of Discrepancies

The resolution of discrepancies, specifically where plant or licensing documentation are inconsistent, will be accomplished by thorough examination of the historical record. Careful consideration will be given to preserving the licensing basis versus just "fixing" the UFSAR. Thus resolution may involve the revision of other supporting plant documents such as a calculation or procedure in addition to or in lieu of, a UFSAR change.

The resolution of any discrepancies will be conducted within the boundaries of established Duke Nuclear System Directives. The Problem Investigation Process (PIP) will be utilized for individual items involving safety-significant issues that require operability evaluations. Resulting changes to the UFSAR procedures, and stations structures, systems or components will be evaluated in accordance with 10 CFR 50.59.

Schedule

Planning and preparation for this project began in March, 1997. The project is divided into Phase I and Phase II. Phase I is a concurrent review of Chapter 5 at all sites and an assessment of any needed changes in methodology prior to proceeding with Phase II. The current schedule is for Phase I to be complete in October 1997.

Phase II will be the review of all other UFSAR chapters. The schedule for Phase II will be developed based on the results

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from Phase I and we will provide you with the phase II
schedule by December 1997.

If there are any questions regarding this matter, please
contact Skip Copp at 704-382-5826.

Sincerely,



M. S. Tuckman

attachment:

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June 16, 1997

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