

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8111030363 DOC. DATE: 81/10/30 NOTARIZED: NO
 FACIL: 50-270 Oconee Nuclear Station, Unit 2, Duke Power Co.
 AUTH. NAME: PARKER, W.O. AUTHOR AFFILIATION: Duke Power Co.
 RECIP. NAME: DENTON, H.R. RECIPIENT AFFILIATION: Office of Nuclear Reactor Regulation, Director
 STOLZ, J.F. Operating Reactors Branch 4

DOCKET #
05000270

SUBJECT: Responds to NRC 810825 request for comment on three outstanding issues in safety evaluation re NUREG-0737 Item III, E1.1, auxiliary feedwater sys evaluation. NRC has not provided sufficient info to justify request.

DISTRIBUTION CODE: A046S COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 2 + 45
 TITLE: Response to NUREG-0737/NUREG-0660 TMI Action Plan Rgmts (OL's)

NOTES: AE00/Dornstein:1cc 05000270

ACTION:	RECIPIENT	COPIES		RECIPIENT	COPIES	
	ID CODE/NAME	LTTR	ENCL		ID CODE/NAME	LTTR
	ORBI #4 BCI 01	7	7			
INTERNAL:	A/DI C&S ENG 22	1	1	A/DI M&O ENG 23	1	1
	A/DI SAFETY AS17	1	1	DEP DIR, DHFS 29	1	1
	DIR, EM PREP 33	1	1	DIRECTOR, DEI 21	1	1
	DIRECTOR, DHFS 28	1	1	DIRECTOR, DL 14	1	1
	DIRECTOR, DSI 24	1	1	ELD	1	0
	I&E 12	2	2	IE/DEP/EPDB	1	1
	IE/DEP/EPLB	3	3	NRR/DL/ADL 16	1	1
	NRR/DL/ADOR 15	1	1	NRR/DL/DRAB 18	3	3
	NRR/DSI/ADRS 27	1	1	NRR/DSI/ADGP 31	1	1
	NRR/DSI/ADPS 25	1	1	NRR/DSI/ADRP 26	1	1
	NRR/DSI/RAB	1	1	NRR/DST DIR 30	1	1
	NRR/DST/ADT 32	1	1	PDR 02	1	1
	REG FILE 04	1	1			
EXTERNAL:	ACRS 34	16	16	FEMA-REP DIV	1	1
	INPO, J. STARNES	1	1	LPDR 03	1	1
	NSIC 05	1	1	NTIS	1	1

APERTURE DIST

NOV 06 1981

TOTAL NUMBER OF COPIES REQUIRED: LTR 59 ENCL 58
~~56~~ ~~51~~

DUKE POWER COMPANY

POWER BUILDING

422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28242

50-270

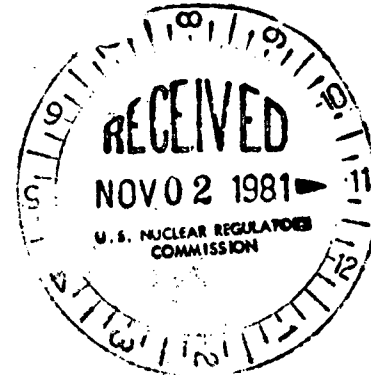
WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

October 30, 1981

TELEPHONE: AREA 704
373-4083

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

Attention: Mr. J. F. Stolz, Chief
Operating Reactors Branch No. 4



Dear Sir:

By letter dated August 25, 1981, the Staff provided a Safety Evaluation Report concerning NUREG-D737, Item II.E.1.1, Auxiliary Feedwater System Evaluation. In this letter, the Staff requested that Duke comment and/or commit to three outstanding issues. The following is the Duke response to this request.

With regard to the requirement to perform a flow test from the Emergency Feedwater Pumps to the steam generators following an extended cold shutdown, the Staff has not provided sufficient information to justify this request. Duke considers the present method of testing the Emergency Feedwater System in accordance with ASME Section XI pump and valve testing and the double verification of the valve line-up following cold shutdown to be sufficient to assure proper performance of the Emergency Feedwater System. As the Staff will recall, flow tests were performed during 1979 following the immediate Order of May 1979. Such a test proposed by the Staff would not increase safety, but may instead degrade overall safety by unnecessarily stressing the steam generator with cold water. Such testing is not required for Emergency Core Cooling Systems on a periodic basis and should not be required for Emergency Feedwater, either.

With regard to the performance of 48-hour endurance tests on all Emergency Feedwater Pumps, the Staff has not provided sufficient information to justify this request. Currently, all Emergency Feedwater Pumps at Oconee are tested periodically in accordance with ASME Section XI. The Staff has not presented any information that shows that such testing is unacceptable. Duke has conducted two 48-hour endurance tests. One was satisfactorily conducted on the Unit 2 Turbine Driven Emergency Feedwater Pump and the second was satisfactorily conducted on the Unit 2, A, Motor Driven Emergency Feedwater Pump. Both of these tests involved running the pumps for 48 hours, allowing the pump to cool for at least 8 hours, and then running the pump for an additional hour. During the period of the test, various pump parameters were monitored on an hourly basis, including bearing temperatures and bearing vibrations. These tests were conducted in accordance with ASME Section XI subsection IWP requirements. These tests were completed without any signifi-

A046
3
//
Asatune
Dist

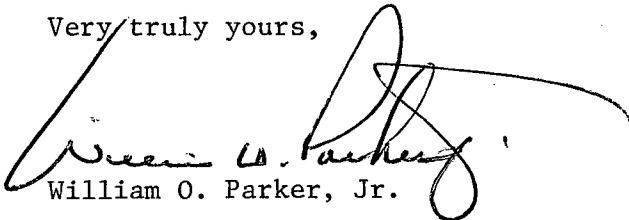
811030363 811030
PDR ADOCK 05000270
PDR

Mr. Harold R. Denton, Director
October 30, 1981
Page 2

cant problems detected. In light of these results, additional endurance testing of EFW pumps is not considered necessary. A copy of the completed test procedure is attached as well as a copy of the current emergency feed-water piping diagram for Oconee Unit 2, PO-121D-2.

With regard to information on the capability to deliver EFW flow following a tornado, this information was not specifically requested by the Staff in its initial request. The primary source of secondary side cooling water in the event of a tornado or any occurrence that causes a loss of the main or emergency feedwater systems is the existing Auxiliary Service Water system. This system is described in Oconee FSAR Section 9.11. The SSF Auxiliary Service Water System will likely be capable of providing flow following a tornado. Further details of the design of this system are provided in a Duke submittal dated March 28, 1980.

Very truly yours,



William O. Parker, Jr.

RLG/php
Attachment