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**DUKE POWER**  
November 30, 1995

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

Subject: Oconee Nuclear Station  
Docket Nos. 50-269, -270, -287  
Electrical Distribution System Functional  
Inspection (EDSFI) Inspection Report 93-02

In the EDSFI inspection report 93-02, the NRC inspection team concluded that additional reviews were needed in the area of potential failures of the governor control system. Finding number 4 of the inspection report indicated that a failure which results in the loss of governor oil needed to be postulated.

Duke Power provided a response to the EDSFI findings in a letter dated July 6, 1993. This response indicated that a detailed single failure analysis of the Keowee governor system would be performed. The governor single failure analysis is finished and includes the postulation of a failure resulting in the loss of governor oil.

In addition to the single failure analysis, Duke committed to install an additional governor oil pump which is supplied by DC power. This commitment was made to enhance the availability of the governor following an extended loss of Keowee auxiliary AC power.

Following a review of the existing Keowee auxiliary AC power system, risk benefit, and modification cost, Duke has determined that the modification is not necessary. Duke revised the Keowee emergency start procedure (AP/0/2000/002) to provide guidance to the Keowee operator for a loss of Keowee auxiliary AC power. This guidance includes steps to align the Keowee auxiliary AC loads to an operable power source. In addition to the procedural controls, control circuitry was installed which automatically transfers the Keowee auxiliary AC loads to an operable power source. Duke submitted a description of this modification to the NRC in a letter dated May 17, 1993. The procedural controls and transfer circuitry ensure that the Keowee auxiliary AC power will not be lost for an extended period.

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The probability that the DC governor oil pump would ever be required to function was reviewed to determine the safety significance of the modification. This review concluded that the probability of using the DC governor oil pump was not significant. Therefore, the low safety significance, combined with the current procedural controls and transfer circuitry, makes the deletion of this commitment a cost beneficial licensing action (CBLA). The deletion of this commitment meets the CBLA criteria and will result in an estimated savings of \$160,000 in labor and parts costs. In addition, the periodic surveillance and inservice testing on the new pump will not be required if the modification is not installed.

If there are any questions, please contact Michael Bailey at (803) 885-4390.

Very Truly Yours,

Handwritten signature in cursive script, appearing to read "J. W. Hampton".

J. W. Hampton, Site Vice President  
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