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SUBJECT: Suppl response to violations noted in Insp Repts  
150-269/93-02, 50-270/93-02 & 50-287/93-02. Corrective actions:  
certain non-safety related 4kV & 6.9kV breakers required to  
trip.

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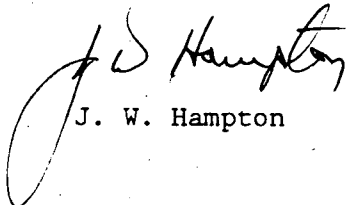
July 14, 1993

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

Subject: Oconee Nuclear Site  
Docket Nos. 50-269, -270, -287  
Inspection Report 50-269, -270, -287/93-02  
Reply to Notice of Violation - Supplemental Information

By letter dated June 7, 1993 I provided a response to the subject Notice of Violation. Based on discussions with the inspection team leader, supplemental information is attached describing the scenarios where certain non-safety related 4kV and 6.9kV breakers are required to trip. As multiple failures are required to impair the ability to mitigate the accident, and maintenance enhancements are planned as described in the original response, designating these breakers as safety-related is not considered necessary or required.

Very truly yours,



J. W. Hampton

xc: Mr. S. D. Ebnetter, Regional Administrator  
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Supplement to Response to a Notice of Violation  
Inspection Report No. 50-269/93-02, 50-270/93-02,  
and 50-287/93-02

As stated in Duke Power's original response to the subject Notice of Violation, it is important that certain 4kV and 6.9kV Switchgear breakers trip under particular scenarios. These breakers include the 6.9kV breakers from the startup transformers (the "E" breakers) and the 4kV breakers that supply some non-safety-related loads (load shed breakers). As described below, a failure of any one of these breakers will not result in loss of the capability to mitigate the consequences of a design basis accident, even when an additional failure is assumed. Multiple failures of these breakers must occur to impact the capability to mitigate an accident.

The failure of one 4kV load shed breaker to trip on a load shed signal could degrade the system, but not prevent it from performing its design basis function. Similarly, if a fault (failure) occurred downstream of a 4kV breaker accompanied by the failure of the breaker to trip (second failure), the system could be degraded, but would still perform its design basis function due to the protective relay scheme and redundant buses. This is confirmed by the FSAR, Table 8.4, which states that loss of one 4160V Auxiliary Switchgear Bus Section is of no consequence due to redundant buses. No mode of failure leading to the loss of the 4kV bus section is specified in the Single Failure Analysis table.

The failure of one 6.9kV E breaker to trip (resulting in two Reactor Coolant Pump motors staying connected to the Keowee Overhead Path) could result in degradation of the system, but preliminary analyses have shown that the system would still perform its design basis function. Certification of the computer program used for this preliminary analysis is pending. If a fault (failure) were to occur downstream of one 6.9kV E breaker, accompanied by the failure of the breaker to trip (second failure), the overhead path would be lost. However, the Keowee Underground Feeder would still be available. This is confirmed by the FSAR, Table 8.4, which states that loss of one of any 230kV bus, PCB-18, 27, and 30, 230kV circuit to Startup transformers CT1, CT2, CT3, and Associated Buses would be of no consequence, as power would be available through the Underground feeder from Keowee.

As multiple failures are required to impair the ability to mitigate the accident, and maintenance enhancements are planned as described in the original response, designating these breakers as safety-related is not considered necessary or required.