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DUKE POWER

September 20, 1990

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

Subject: Oconee Nuclear Station

Docket Nos. 50-269, -270, -287

McGuire Nuclear Station Docket Nos. 50-369, -370 Catawba Nuclear Station Docket Nos. 50-413, -414

Dear Sir:

In 1988 Generic Letter 88-14 was issued and requested that licensees review NUREG-1275, Volume 2, and to perform a verification of the design and operations of the instrument air system. The generic letter requested that a response be provided within 180 days. Responses for each of our three stations (Oconee, McGuire, and Catawba) were submitted by my letters dated May 8, 1989, June 15, 1989, and July 21, 1989.

Recently, concerns regarding the information provided in the responses and concerns relative to the scope of our review at Oconee have been raised. These concerns were identified as a result of a recent event at Oconee involving valves PR-13 and 17 of the Penetration Room Ventilation System (PRVS). Details regarding this event are discussed in License Event Report 269/90-10 and NRC Inspection report 50-269,270,287/90-17.

I have instructed my staff to review our responses for each station and, where appropriate, develop an action plan to resolve any identified problems. As a result of this effort, the following action plan was developed. Each station will be implementing this plan, which should result in an improved response that is more in line with the intent of the generic letter.

- 1) Review all air operated valves to the criteria of Generic letter 88-14 and suplement the present responses as neccessary.
- 2) Identify other air operated components that meet the criteria of the generic letter
- 3) Revise the verification testing program provided in the initial response so that it is consistent with the scope of the generic letter for each identified component (both valves and other air operated components)
- 4) Develop a schedule for completion of verification testing of each identified component.

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- 5) Define how the instrument air system is to be tested and what the acceptance criteria should be.
- 6) For the newly identified components (not previously identified in the initial response), review the response to generic letter verification action item 2 to verify completeness and accuracy
- 7) Submit to the NRC the updated information developed as a result of this action plan.

It is my belief that the supplemental information that will be submitted as a result of implementing this action plan will be more in accordance with the intent of the generic letter. We remain committed to completing the implementation of this plan at the earliest possible time. Individual schedules for each station is still under development. I anticipate being able to provide schedule information by January 15, 1991.

Very truly yours,

Hal B. Tucker

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Document Control Desk September 20, 1990 Page 3

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