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See Rpt.

SUBJECT: Confirms completion of listed actions, per NRC 910215 request. Confirmation of completion of testing upgrade noted as Step 2 in 901101 response to GL 89-04 will be sent after completion in Aug 1992. Rev 18 to IST Program Manual encl.

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DUKE POWER

May 7, 1992

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

Subject: Oconee Nuclear Station, Units 1, 2, and 3
Docket Nos. 50-269, -270, -287
Generic Letter 89-04
Inservice Testing (IST) Program

By letter dated November 1, 1990 information was provided to the NRC concerning the schedule for adding valves to the IST program that were not currently in the program but had been identified in the active valve list. This item was identified as Step 1 in our November 1, 1990 response.

These additions were completed during the previous refueling outages as listed below.

Unit 3 EOC 12 completed	March	27, 1991
Unit 1 EOC 13 completed	September	23, 1991
Unit 2 EOC 12 completed	March	3, 1992

This letter provides confirmation of completion of the above actions as requested by your February 15th, 1991 letter. Confirmation of completion of the testing upgrade identified as Step 2 in our response will be sent when complete (expected to be August 1992).

Additionally, pursuant to 10CFR 50.55 (a) and Generic Letter 89-04, attached for your information and review is the latest IST Program Manual for Oconee Nuclear Station. A summary sheet has been provided to identify the major changes made to the manual. Some of the Relief Requests have been revised and three new Relief Requests have been added.

In the November 1, 1990 submittal for Generic Letter 89-04 our position for valves CF-11 & 13 included a one time disassembly to verify valve integrity and that service conditions do not adversely affect the valves. A test to verify the valves will open to allow passage of

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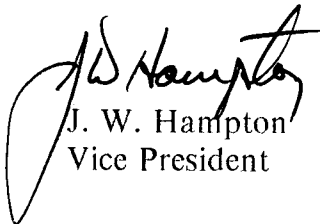
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required flow under accident conditions will be performed each refueling outage in lieu of the one time disassembly. This test provides better assurance the valves will function as required over a longer period of time than the initial position using the one time disassembly. Relief Request #12 outlines the revised testing to be performed on these valves. The remainder of the changes made in this revision of the IST Program do not change our positions previously submitted in accordance with Generic Letter 89-04.

Very truly yours,



J. W. Hampton
Vice President

Attachments

xc: (W/Attachments)

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SUMMARY SHEET

Inservice Inspection Program Manual

The following are the major changes being made by Revision 18.

1. The following changes are being made due to modification of piping configuration for MDEFWP suction from hotwell.

Add: 1,3C-850

Add 1,3C-852

Delete 1,3C-568

These changes are also reflected in IWV Relief Request 34.

2. The following valves are being removed from the IWV Program due to no longer being considered active.

1,2,3HP-98

1,2,3HP-99

1,2,3HP-115

2LP-4

3. LP-28 and HP-363 were added to the IWV program due to Design revision to the Active Valve List. Cold shutdown justifications 31 and 32 were added.

4. The following valve changes were made to due to new valves being added to RCP seal lines.

Add: 1,2,3HP-454

Add: 1,3HP-390

Add: 1HP-457

Delete: 1,3HP-283

Delete: 1,2,3HP-284

Delete: 1HP-286

These additions and deletions were also reflected in IWV Relief Request 28.

5. The following valves were changed to EMO:

1,2CCW-268

1,2CCW-287

6. The following valves had been identified as manual but are EMOs:

3CF-3

3CF-4

7. IWV Relief Requests 2, 4, and 12 were changed due to changes in testing method.
8. IWV Relief Request 25 was changed and Cold Shutdown Justification 31 was changed due to changes in full flow testing for CF-12 and 14. Relief request for LP-29 and 30 is no longer necessary due to changes in Active Valve List and testing method.
9. IWV Cold Shutdown Justification 28 was modified to remove HP-99 due to change in active valve list. The justification was also reworded for clarity.
10. IWV Relief Request 43 was added due to changes in testing method.
11. IWP Relief Requests 8 and 9 were added.