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 FACIL: 50-269 Oconee Nuclear Station, Unit 1, Duke Power Co. 05000269
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 STOLZ, J.F. Operating Reactors Branch 4

SUBJECT: Requests exemption from standby shutdown facility fire protection requirements re source range monitors & steam generator pressure indication, per 830608 rule. Design meets 10CFR50, App R, Section III.G.3 & III.L requirements.

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July 15, 1983

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

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287

Dear Sir:

In accordance with a Staff request, the following exemption relative to the Oconee Standby Shutdown Facility (SSF) is requested.

The Oconee SSF was designed and constructed, in part, to resolve the safe shutdown requirements for fire protection (Appendix R to 10 CFR 50, Sections III.G.3 and III.L). The NRC has found that the SSF design meets the appropriate requirements with the exception of process monitoring instruments for source range flux monitoring and steam generator pressure indication.

Appendix R to 10 CFR 50, Section III.L.2 states, in part:

2. The performance goals for the shutdown functions shall be:
 - a. The reactivity control function shall be capable of achieving and maintaining cold shutdown reactivity conditions.
 - b. The reactor coolant makeup function shall be capable of maintaining the reactor coolant level above the top of the core for BWRs and be within the level indication in the pressurizer for PWRs.
 - c. The reactor heat removal function shall be capable of achieving and maintaining decay heat removal.
 - d. The process monitoring function shall be capable of providing direct readings of the process variables necessary to perform and control the above functions.
 - e. The supporting functions shall be capable of providing the process cooling, lubrications, etc., necessary to permit the operation of the equipment used for safe shutdown functions.

The NRC position, as conveyed to Duke in the SSF SER, was that source range, flux monitoring and steam generator pressure indication were required to meet these requirements.

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Duke held an appeal meeting with the NRC on June 8, 1983 at which time Duke presented the bases for its position that such instrumentation was not required. The Staff listened to the Duke discussions and concluded that, due to the unique Oconee SSF design, source range monitors and steam generator pressure indication would not be required, but that an exemption to the rule would be necessary. Duke maintains that the existing SSF design meets the requirements and is in full compliance with the regulation. Nevertheless, in accordance with the Staff request, and in consideration of the desire to resolve this in a timely manner, Duke hereby requests an exemption.

Inasmuch as this exemption request is being submitted in response to a Staff request, no license fees are deemed necessary.

Very truly yours,



Hal B. Tucker

RLG/php

cc: Mr. James P. O'Reilly, Regional Administrator
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NRC Resident Inspector
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