

Dockets Nos. 50-269  
50-270  
50-287

*DMB 076*

SEP 2 1983

Mr. H. B. Tucker  
Vice President - Nuclear  
Production Department  
Duke Power Company  
P. O. Box 33189  
422 South Church Street  
Charlotte, North Carolina 28242

SUBJECT: NUREG-0737 ITEM II.F.1.5 CONTAINMENT WATER LEVEL MONITOR

Dear Mr. Tucker:

This letter is in response to your letters dated May 31, 1983 and August 26, 1983 dealing, in part, with the above subject item in which you requested an amendment to the Confirmatory Order of March 18, 1983. Items II.B.3 and II.F.1.3 of your August 26 letter will be addressed in separate correspondence.

The NRC staff has concluded that an amendment to your Confirmatory Order is not required solely because the containment water level monitoring system, which had been in place and operational prior to the Order, does not meet only the environmental qualification aspect of Clarification Item 1, Item II.F.1.5. (Regulatory Guide 1.89). The Oconee water level monitoring system is still required to conform to R.G. 1.89, but this single aspect of an otherwise operational and implemented system will be addressed within the overall scope of the staff review of the system's compliance with 10 CFR 50.49 (the Environmental Qualification Rule). This approach is consistent with the staff's safety evaluation report (SER) for Oconee Items II.F.1.4, 5 and 6 in which the environmental qualification requirements were reserved for review under the scope of 10 CFR 50.49. The staff's SER was transmitted to you in separate correspondence dated September 1, 1983.

As noted in a telephone discussion with Mr. Robert Gill of your staff on August 31, 1983, the discrete point system identified in your August 26 letter would appear to meet the intent of the Commission requirement for a continuous system. This guidance is predicated on the information supplied by you to date and provided that the system is capable of the following: Each of your proposed redundant systems should both afford a recording means continuous over time and also incorporate data collection points spaced at a maximum elevation interval of six inches. As noted by Mr. Gill, your voluntary submittal of intended system parameters and design description is appreciated. A supplement to the NRC staff's SER based on your submitted information will be issued if deemed necessary by the staff.

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OFFICE						
SURNAME						
DATE						

Mr. H. B. Tucker

- 2 -

Item II.F.1.5, as stated in the Confirmatory Order, will be considered as met (except as noted above) provided that the justification stated in your May 31, 1983 letter (Attachment 2) continues to apply. This justification includes, but is not limited to, the facts that: 1) the present non-environmentally qualified narrow range system remains in place and operational until replaced with qualified equipment; 2) the wide range monitor system continues to remain qualified; and 3) compensatory measures for the narrow range system, such as existing RB radiation monitors and the RCS inventory balance calculations, remain in effect. Furthermore, justification shall also require that the potential failure of the non-environmentally qualified narrow range system in the event of an accident will not adversely affect other safety grade equipment or mislead the control room operators; this condition, we understand, is presently met.

Finally, based on discussion with Mr. Gill on August 29, 1983, Attachment 2 of your May 31, 1983 letter will be considered as submittal of a justification for continued operation (JCO) of your narrow range sump level monitors. Also noted in discussion with Mr. Gill is the fact that your stated implementation schedule (see Attachment 2) of a qualified narrow range system will be addressed under the 10 CFR 50.49 review. The NRC staff notes that based on the currently predicted Oconee refueling outages that your implementation schedule unless modified is in jeopardy of missing the 10 CFR 50.49(g) qualification deadline of March 31, 1985. The staff intends to scrutinize this issue in view of its being identified at this early date and due to the fact that you have now secured our guidance on system design compliance and should proceed with an expedited procurement and implementation schedule.

Sincerely,

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Original signed by

John F. Stolz, Chief  
 Operating Reactors Branch #4  
 Division of Licensing

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

September 2, 1983

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Mr. H. B. Tucker

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Sincerely,



John F. Stolz, Chief  
Operating Reactors Branch #4  
Division of Licensing

Enclosure:  
As stated

cc  
See next page

Duke Power Company

cc w/enclosure(s):

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