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 DENTON, H. R. Office of Nuclear Reactor Regulation, Director
 STOLZ, J. F. Operating Reactors Branch 4

SUBJECT: Responds to 840612 request re NUREG-0737, Items I, A, 1, 3, re shift manning overtime limits & II, K, 3, 3, re reporting safety & relief valve failures. Proposed Tech Specs address Generic Ltr 82-16, per 840626 application for license amend.

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July 16, 1984

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, 50-270, 50-287

Dear Sir:

In response to the NRC letter dated June 12, 1984 which requested Technical Specifications to address the NUREG-0737 items I.A.1.3 and II.K.3.3, the attached information is provided. These two items concern shift manning overtime limits and reporting of SV and RV failures and challenges, respectively.

With respect to staff working hours (Item I.A.1.3), Duke Power Company (Duke) has developed and prepared Technical Specification to address the staff working hours in compliance to the Generic Letter 82-16. The proposed amendment to the Oconee Facility Operating License and revisions to the Oconee Nuclear Station Technical Specifications for this item was submitted to the NRC by my letter dated June 26, 1984.

By letter dated December 28, 1982, Duke stated its position regarding reporting SV and RV failures and challenges (II.K.3.3). Duke maintains that as required by 10CFR50.73 operational experiences such as SV and RV failures and challenges are reported by Licensee Event Reports (LER). Also, with due consideration to the other basis provided in the Attachment, Duke has determined that Technical Specification for this item (II.K.3.3) is unnecessary, and thus, no proposed Technical Specification is provided in this submittal.

Very truly yours,



Hal B. Tucker

MAH/slb

Attachment

cc: Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW. Suite 2900
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Mr. Harold R. Denton, Director
July 16, 1984
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cc: Mr. J. C. Bryant
NRC Resident Inspector
Oconee Nuclear Station

Ms. Helen Nicolaras
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Duke Power Company
Oconee Nuclear Station

Response to NRC Letter Dated June 12, 1984
NUREG-0737 Technical Specifications

(1) Limit Overtime (I.A.1.3)

Duke has submitted a proposed Technical Specification Revision in response to this item. The proposed amendment was submitted June 26, 1984.

(2) Reporting SV and RV Failures and Challenges (II.K.3.3)

Duke does not consider it necessary or appropriate to be including this item in Technical Specifications. The basis of this position is provided in the following.

1. Plant changes made as a result of TMI such as upgraded Emergency Feedwater System, and reduced RPS overpressure trip setpoints have effectively reduced challenges to the safety and relief valves.
2. The results of the EPRI Relief and Safety Valve test program are being used to assure the operability of these valves, if ever challenged.
3. Operating experience over the past four and a half years at Oconee has indicated no challenges to these valves.
4. Existing Technical Specifications effectively address degradation of the reactor coolant system pressure boundary of which these valves form a part. Thus, failures of these valves to fulfill their safety function would be reported.
5. Operational experiences such as SV and RV failures and challenges are reported by Licensee Event Reports (LER) as required by 10 CFR 50.73, NUREG-1022.
6. Annual reports are no longer required by Oconee Technical Specifications as a result of a License Amendment issued January 30, 1978. Reporting these events either monthly or annually duplicates information that is provided by LERs. The reporting of challenges to and failures of relief and safety valves has not been explicitly addressed, but is implicitly included within the new reporting requirements.

7. The original basis for this requirement appears to be founded on establishing and maintaining an historical data base. With due consideration to the above statements, it is considered that inclusion of this reporting requirement in Technical Specifications is an unnecessary administrative effort and duplicates information already required to be reported.