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

SUBJECT: Forwards response to NRC 850711 request for addl info re open items identified in util 840928 interim rept based on review of Reg Guide 1.97 concerning emergency response capability. Response to Items 2 & 3 will be sent by 860106.

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September 9, 1985

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

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

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

Dear Sir:

By letter dated July 11, 1985, the NRC provided an Interim Report for Oconee Nuclear Station. The interim report was based on a review of the Regulatory Guide 1.97 Report which was submitted by Duke to the NRC by a letter dated September 28, 1984. Within the July 11, 1985 letter, a request for additional information regarding the open items identified in the interim report was made and, in addition, to provide any other comments concerning the interim report.

To this end, please find attached Duke's response to the identified open items. Please note that Duke considers Items 2 and 3 (Pressurizer Level and Pressurizer Heater Status) to be B&W Generic Issues. As such, Duke Power, in concert with the B&W Owners Group, will develop a generic response for Items 2 and 3. A submittal is planned by January 6, 1986.

Duke has reviewed the interim report. It is suggested that the reference made to diesel generators on page 10 of the interim report be corrected. Other than that, there are no additional comments.

Very truly yours,



Hal B. Tucker

PFG:slb

8509170160 850909  
PDR ADOCK 05000269  
F PDR

Attachment

cc: Dr. J. Nelson Grace, Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

A003  
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Mr. Harold R. Denton, Director

September 9, 1985

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

Mr. J. C. Bryant  
NRC Resident Inspector  
Oconee Nuclear Station

Attachment  
Duke Power Company  
Oconee Nuclear Station  
Response to Request For Additional Information:  
Emergency Response Capability - Regulatory Guide 1.97  
NRC Letter Dated July 11, 1985

1. Accumulator tank level and pressure--environmental qualification should be addressed in accordance with 10 CFR 50.49 (Section 3.37).

Response

Duke will review these instruments for 10 CFR 50.49 applicability and will initiate discussions with the Equipment Qualification Reviewers in the NRC. Further contact with the Regulatory Guide 1.97 Reviewers will be initiated if their input is warranted or desired.

2. Pressurizer level--the licensee should supply additional analyses to support the deviation from the recommended range (Section 3.3.9).

Response

Duke Power Company, in concert with the B&W Owners Group, will develop a generic response to this item. A submittal is planned by January 6, 1986.

3. Pressurizer heater status--the licensee should provide the instrumentation recommended by Regulatory Guide 1.97 (Section 3.3.10).

Response

Duke Power Company, in concert with the B&W Owners Group, will develop a generic response to this item. A submittal is planned by January 6, 1986.

4. Steam generator level--the licensee should provide wide range Category 1 instrumentation for this variable (Section 3.3.13).

Response

The recommendation for steam generator (SG) level range given in Regulatory Guide 1.97 is based on a U-tube steam generator design. This range, lower tube-sheet to steam separators, does not cover the entire height of the generator. Similarly, the appropriate range for the once-through steam generator is covered by the 0-388" range of the current Category 1 instrument. While it is possible to transfer heat over the entire range of the generator, in practice almost all heat transfer occurs in the lower portion of the SG (covered by the instrument) where boiling occurs.

The 0-388" range covers normal operation, the post-trip low level limit, the natural circulation setpoint, the loss of subcooled margin setpoint, and the steam aspirating ports. Thus, this range covers the plant response during normal operation and virtually all postulated abnormal transients. It is possible to envision severe SG overfeed transients for which the SG level could momentarily go offscale high. However, the 0-630" range would not provide any additional useful information during such a transient. Operator action to mitigate a severe overfeed transient is simple and straightforward--isolating feedwater from the affected steam generator(s). The high SG level condition is monitored adequately by the 0-388" scale.

Upgrading the full range steam generator level indication to Category 1 would involve significant expense and would not enhance the operability or safety of the plant. Duke Power Company maintains that the current 0-388" Category 1 instrument will provide adequate level indication during an accident situation.

5. Safety/relief valve positions or main steam flow--the licensee should supply the recommended instrumentation (Section 3.3.15).

Response

Duke will install instrumentation for monitoring Main Steam Relief Valve OPEN/CLOSED status. A description of this instrumentation and an implementation schedule will be submitted by September, 1986.