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SUBJECT: Responds to Generic Ltr 88-03 re steam binding of auxiliary feedwater pumps. Plant not susceptible to subj event.

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May 25, 1988

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
GL 88-03

Gentlemen:

The proceeding information is in response to Generic Letter (GL) 88-03 dated February 17, 1988, concerning steam binding of auxiliary feedwater (AFW) pumps. A review of incidents leading to the issue of GL 88-03 indicates that Oconee is not susceptible to such an event. Assured means of preventing substantial backflow conditions are provided by multiple barriers including swing check valves, tilting disc check valves, motor operated gate valves, and spring loaded automatic recirculation control valves. For the A and B Trains of the Emergency Feedwater (EFW) system, there are 4 and 5 check valves respectively between the Turbine Driven EFW Pump and the Once Through Steam Generator (OTSG); there are 5 and 6 check valves respectively between the Motor Driven EFW pumps and the OTSG. Extremely long piping runs (625-911 ft.) between the EFW pumps and OTSG's provide a means for condensing backleakage. In addition, for all three Oconee units there have been no backleakage problems in 14 years of operation.

Within GL 88-03, the NRC requested that all addressees provide a letter of confirmation indicating that procedures be maintained:

1. To monitor fluid conditions within the AFW system each shift during times when the system is required to be operable. This monitoring should ensure that fluid temperature at the AFW pump discharge is maintained at about ambient levels;
2. For recognizing steam binding and for restoring the AFW system to operable status should steam binding occur.

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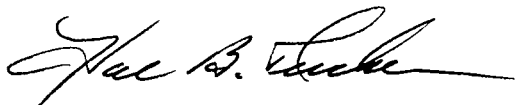
In response to Item 1, the Turbine Driven EFW pump casing surface temperature is monitored by procedure once per 12 hour shift when the EFW system is required to be operable. Duke finds this monitoring program to be adequate based on the low susceptibility to steam binding due to multiple barriers and long piping runs, as well as the absence of previous backleakage problems. In any event, the Turbine Driven EFW pump is capable of supplying sufficient feedwater to enable the Reactor Coolant System to cool down to conditions at which the Decay Heat Removal System may be operated.

In response to Item 2, procedures at Oconee do not specifically address recognizing steam binding and restoring the EFW system to operable status should steam binding occur. However, Oconee Technical Specification 3.4 provides Limiting Conditions for Operation (LCO) of the EFW system. If steam binding of an EFW pump was identified, the pump(s) would be declared inoperable and the appropriate Technical Specification LCO would be entered. Corrective action would be based on an evaluation of the specific event. Oconee Station Directives provide the administrative guidelines for making operability determinations and initiating corrective action when operating under an LCO as defined by Technical Specifications.

As requested in GL 88-03, this letter confirms that fluid conditions within the EFW system are monitored each shift by procedure. However, Duke finds that "specific" procedures addressing steam binding of EFW pumps are redundant and unnecessary. Administrative guidelines currently in place at Oconee will ensure that any steam bound EFW pump is restored to operable status in a timely manner.

I declare under penalty of perjury that the statements set forth herein are true and correct to the best of my knowledge.

Very truly yours,



Hal B. Tucker

PJN/328/bhp

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May 24, 1988

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DOCKET NO(S). 50-269
50-270
50-287

Mr. H. B. Tucker, Vice President
Nuclear Production Department
Duke Power Company
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Charlotte, NC 28242

SUBJECT: OCONEE NUCLEAR STATION, UNITS 1, 2, AND 3

The following documents concerning our review of the subject facility are transmitted for your information.

- Notice of Receipt of Application, dated _____.
- Draft/Final Environmental Statement, dated _____.
- Notice of Availability of Draft/Final Environmental Statement, dated _____.
- Safety Evaluation Report, or Supplement No. _____ dated _____.
- Environmental Assessment and Finding of No Significant Impact, dated _____.
- Notice of Consideration of Issuance of Facility Operating License or Amendment to Facility Operating License, dated _____.
- Bi-Weekly Notice; Applications and Amendments to Operating Licenses Involving No Significant Hazards Considerations, dated 5/4/88 [see page(s)] 15911.
- Exemption, dated _____.
- Construction Permit No. CPPR-_____, Amendment No. _____ dated _____.
- Facility Operating License No. _____, Amendment No. _____ dated _____.
- Order Extending Construction Completion Date, dated _____.
- Monthly Operating Report for _____ transmitted by letter dated _____.
- Annual/Semi-Annual Report- _____
_____ transmitted by letter dated _____.

Office of Nuclear Reactor Regulation

Enclosures:
As stated

cc: See next page

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Mr. H. B. Tucker
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Oconee Nuclear Station
Units Nos. 1, 2 and 3

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