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SUBJECT: Provides proposed program for completing IPE for plant, per Generic Ltr 88-20.

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October 30, 1989

U. S. Nuclear Regulatory Commission
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Washington, DC 20555

Subject: Oconee Nuclear Station
Docket Nos. 50-269, 50-270 & 50-287
Generic Letter 88-20

Dear Sir:

In response to GL88-20 and supplement, Duke Power Company is providing herein the proposed program for completing the IPE for Oconee Nuclear Station.

In June 1984 Duke and EPRI completed a Level 3 PRA, with external events, on Oconee Unit 3. This PRA (NSAC-60) has been reviewed by NRC and its contractors. Subsequently, in 1987 Duke began a program to update the NSAC-60 PRA to take into account a number of changes made to the plant since 1980, the original PRA baseline. For satisfying the IPE requirement, Duke intends to utilize the updated Oconee PRA, which is a level 3 PRA with analysis for external events.

The updated Oconee PRA was planned, managed, and carried out entirely with Duke personnel. This PRA takes into account a more complete data base, updated plant system configurations and corrected system models. The overall methodology is consistent with the PRA Procedures Guide, NUREG-2300. The human interaction assessment employed the EPRI sponsored SHARP methodology. The in-plant consequence analysis, consisting of accident progression is based on the MAAP computer code (MAAP 3.0B). Finally, the CRAC2 computer code was utilized to perform the ex-plant consequence analysis.

Although a draft copy of the updated Oconee PRA is currently available, a few additional tasks remain to be completed for the IPE applications. These tasks and their schedules as presently envisioned are as follows:

Finalize Unit 3 Results	2/90
Assess Unit 1&2 Differences	2/90
A-45 Evaluation and USI/GSI Screening	4/90
Examination of Results	8/90
Submittal of IPE Package to NRC	12/90

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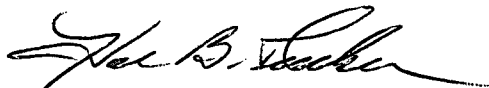
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Nearly all the information the NRC is seeking in the IPE submittal is contained in the completed Oconee PRA document. Accordingly, our submittal package will include a copy of the updated PRA, a "road map" for the requested information within the PRA, a discussion of the evaluation of A-45 and other USIs/GSIs, a summary of Duke actions in response to the PRA results, and a discussion of conformance to GL88-20.

Since our IPE methodology is PRA methodology and since our PRA documents are nearly completed, restructuring the PRA reports in the order suggested by the IPE submittal guidance would require additional resources and paperwork and is not warranted. Our submittal package contains all the information NRC is seeking.

We trust that the NRC finds the program outlined above will satisfy the intent and spirit of the IPE letter.

Very truly yours,



H. B. Tucker

PFG/75/td

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