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SUBJECT: Forwards schedular justification re Generic Ltr 89-04.

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DUKE POWER

January 12, 1990

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269,-270,-287
Generic Letter 89-04
Scheduler Justification

Gentlemen:

By letter dated October 3, 1989 I informed the NRC of the Oconee Nuclear Station schedule to address Generic Letter 89-04. Please find attached the justification for the proposed schedule provided by my October 3, 1989 letter.

If there are any questions, do not hesitate to contact by staff through normal licensing channels.

Very Truly Yours,

H. B. Tucker _{MJT}

Hal B. Tucker

PJN/81

Attachment

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OCONEE NUCLEAR STATION
GENERIC LETTER 89-04
SCHEDULAR JUSTIFICATION
January 1990

Introduction:

Generic Letter 89-04 was received by Duke Power Company on April 17, 1989. As detailed below, Oconee Nuclear Station (ONS) had initiated an overall upgrade to the IST program. By letter dated October 3, 1989 Duke informed the NRC of the ONS IST program upgrades in progress and identified a schedule for response to GL 89-04. The proceeding information is provided as a basis for the ONS response schedule with regard to GL 89-04.

Discussion:

NRC approval of the first ten year interval Oconee IST program was provided by a letter dated March 25, 1982. An upgrade to assure adequacy of the IST program scope and implementing procedures began in 1988. GL 89-04 guidance is now being incorporated into the program upgrade.

The initial ONS IST program upgrade was a three part process:

- 1) Preparation of IST scope via the active valve list;
- 2) Verification of the active valve list;
- 3) Inclusion of new valves into IST program, including preparation of test procedures;

As a result of GL 89-04, two items have been added:

- 4) Review of IST program against GL 89-04 guidance;
- 5) Implementation of GL 89-04 guidance.

During September 1988 the active valve list design study was initiated. The design study involved a review of all valves required to function to mitigate the consequences of an accident, not necessarily limited to FSAR Chapter 15 design basis accidents.

In June 1989 the active valve list design study was completed. On a per unit basis, approximately 300 valves per unit were identified, of which 80 were not included in the 550 valves in the current IST program. Station verification of the list then began and is

still in progress for Units 1 and 2.

The verification process involves approximately one person-month per unit. Completion of the verification process will establish the scope for the IST program. With this scope established, testing procedures will be developed and implemented on a schedule concurrent with upcoming cycles. Specifically, these procedures will be implemented during Unit 1 cycle 13 beginning April 1990, Unit 2 cycle 12 beginning September 1990, and are currently being implemented during Unit 3 cycle 12. Development of test procedures involves approximately four person-months per unit.

The fourth and fifth steps in the IST program upgrade will assure review and implementation of applicable GL 89-04 guidance. Results of a preliminary review indicate that for many of the GL 89-04 positions ONS is currently in conformance, however conformance with certain GL positions cannot be confirmed until completion of the scope/verification process. Completion of the IST program upgrade is currently expected by November 1, 1990. At that time the NRC will be provided with the upgraded IST program, and all GL 89-04 guidance and staff positions will be addressed.

Implementation of changes to the IST program as a result of GL 89-04 will commence concurrent with the first refueling outages following November 1, 1990 (Unit 1 EOC 13, Unit 2 EOC 12, Unit 3 EOC 12). In order to accelerate the schedule for review and implementation of GL 89-04, the additional resource burden would delay implementation of IST program upgrades currently in progress. It is not prudent or practical to delay implementation of upgrades in progress to address GL 89-04.

In addition, other regulatory issues being addressed by Duke impact the available resources that can be brought to bear in responding to GL 89-04. To assure that our efforts in responding to these regulatory issues are not compromised, the additional time being taken to provide a response to GL 89-04 is necessary. Briefly, the other regulatory issues are:

- 1) In our response to GL 88-14 (see Duke letters dated May 8, 1989, June 15, 1989, and July 21, 1989) we had committed to verify by test that air operated valves will go to their fail-safe position upon loss of Instrument Air. This may in some cases involve the development of new testing procedures. This effort is still ongoing and has impacted resources needed to respond to GL 89-04.
- 2) On June 28, 1989 the NRC issued GL 89-10 which concerned testing and surveillance requirements for safety-related motor operated valves (MOV). The intent of this Generic Letter is for licensees to implement programs that ensure all applicable MOVs are capable of operating under design basis conditions. Within the Generic letter, the NRC recognized that the MOV issue is not a simple task and that the effort should be

viewed as a long-term ongoing program. Significant resources were utilized in developing the initial response to this Generic Letter. In addition, due to the extensive number of applicable MOVs, significant resources will be required for program implementation. As a result of this effort, resources available to address the regulatory initiatives of GL 89-04 were impacted.

- 3) As discussed in Licensee Event Report (LER) 269/89-15, Duke committed to review the entire containment leak testing program against current interpretations of requirements and verify that all requirements are either met or have approved exemptions. In addition all exemptions will be reviewed to assure that the technical justifications for the exemption is still valid. This effort is still ongoing and has impacted resources required to respond to GL 89-04.

As a result of regulatory initiatives and upgrades to the IST program which were already in progress, the schedule for response to GL 89-04 has been extended. Response to GL 89-04 has been incorporated into the overall process to upgrade the IST programs.