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SUBJECT: Forwards response to 900111 ltr re revs to plant emergency classification scheme.

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February 23, 1990

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Oconee Nuclear Station Emergency Plan Review
Revisions 89-01 and 89-02
Response to NRC letter dated January 11, 1990

Gentlemen:

I am submitting a response to your letter of January 11, 1990 concerning changes made to the Oconee Nuclear Station emergency classification scheme. Attachment to this letter provides responses to all items, except items 3 and 5, identified in Enclosure 1 to your letter of January 11, 1990. We intend to address the remaining two items in a meeting with the NRC on February 26, 1990 in Atlanta. The proposed revisions for emergency classification addressed by this letter will be implemented by March 1, 1990.

At the present time, I do not plan to respond to the comments provided by Enclosure 2 to your letter concerning items to consider for possible plan improvement. A Duke Power Company task force has been assigned to review these comments and to determine if any additional improvements should be made to the classification procedure.

Very truly yours,

Hal B. Tucker

H. B. Tucker

MAH72/td

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Attachment

Duke Power Company

Oconee Nuclear Station

Emergency Plan Revisions 89-01 and 89-02

Response to NRC Letter Dated January 11, 1990

All items are referenced to Section D, Figure D-1 of the Oconee Nuclear Station Emergency Plan.

Revision 89-01

1. NRC Comment:

(Alert No. 7) The revised Oconee EAL, Loss of all AC power for greater than 15 minutes during cold shutdown through refueling operations, does not address the NUREG-0654 Example Initiating Condition for more than a momentary loss of AC power (up to 15 minutes) during hot shutdown or operating modes. Thus, the anticipatory intent of the EALs has not been met.

Response:

At the present time, loss of all AC power for less than 15 minutes during power operations would require an Alert to be classified under Alert No. 21, Degraded Function of System(s) Needed to Maintain Plant Hot Shutdown Conditions - no high pressure injection flow. If the loss of power lasted longer than 15 minutes, the event would be upgraded to a Site Area Emergency (SAE No. 6). This is in keeping with the intent of NUREG 0654.

Even though we believe we are covered for momentary loss of ALL AC power during power operations, we will provide an additional bullet under Alert No. 7 to include the following words "Operating Mode: Above cold shutdown. Momentary loss of all AC power >1 but <15 minutes."

2. NRC Comment:

(Alert No. 8) The Oconee EAL Scheme was revised to delete the momentary loss (up to 15 minutes) of all DC power onsite. This deletion is not consistent with NUREG-0654.

Response:

Momentary loss of DC power to all vital panelboards for >1 but <15 minutes will be added to the classification scheme for operation above cold shutdown.

3. NRC Comment:

(Alert No. 13) The revised Oconee EAL, Fires that render inoperable an ECCS system (both trains) required for current state of operation, does not meet the intent of the NUREG-0654 EAL, Fires potentially affecting safety systems. The previous Oconee EAL was consistent with NUREG-0654; therefore, the Plan was revised in a non-conservative manner.

Response:

Duke Power Company intends to cover this item during a meeting with the NRC on February 26, 1990 concerning emergency classification for events relating to fire, security and natural disasters.

4. NRC Comment:

(Site Area Emergency No. 5) the Oconee EAL, Steam line break outside containment with primary to secondary leak greater than or equal to 50 gpm and indication of failed fuel, does not appear to be consistent with NUREG-0654. As written, the EAL implies the loss of three fission product barriers which would be classified as a General Emergency, whereas the clear intent of NUREG-0654 is loss of 2 of 3 fission product barriers (steam line break inside containment). In addition, the Plan does not adequately define indication of fuel damage.

Response:

The initiating condition will be reworded as follows: "Steam line break with P/S leak equal to or greater than 50 gpm." The operating mode for this event will be power operations through hot shutdown. A steam line break inside and outside containment will be given emergency action levels. A steam line break inside containment coupled with a 50 gpm steam generator tube leak and an indication of failed fuel will be classified based on: "Rapidly decreasing steam line pressure and steam generator tube leak equal to or greater than 50 gpm and valid RIA 57 and 58 HIGH alarm (630 R/hr)." This emergency action level assumes the loss of the pressure boundary and the cladding boundary.

The steam line break outside containment coupled with a 50 gpm steam generator tube leak assumes the loss of two fission product barriers - loss of the pressure boundary and loss of containment. The emergency action levels for this event are: "Non-isolable steam line break and steam generator tube leak equal to or greater than 50 gpm."

5. NRC Comment:

(Site Area Emergency No. 11) The revised Oconee EAL, Fires that result in the inability to achieve or maintain hot shutdown or fire in control room requiring evacuation and unit cannot be maintained at hot shutdown from the auxiliary control panel, is not consistent with the NUREG-0654 initiating condition, Fire compromising the function of safety systems. The previous EAL, Observation of a fire causing the loss of redundant safety system trains or function, was adequate; therefore, the Plan was revised in a non-conservative manner.

Response:

Duke Power Company intends to cover this item during a meeting with the NRC on February 26, 1990 concerning emergency classification for events relating to fire, security, and natural disasters.

6. NRC Comment:

(General Emergency No. 1.a, b.) The Oconee EAL, as revised, is not consistent with the EAL contained in Emergency Plan Implementing Procedure RP/0/B/1000/1. Specifically, the Plan describes "two hour dose calculations verify dose rates at the site boundary greater than or equal to 1 rem whole body and 5 rem thyroid at the site boundary," however, Enclosure 4.1.4 to the Procedure does not have a corresponding EAL. The procedural EAL addresses only "dose calculations or field monitoring measurements resulting in a two hour dose projection of 1 rem whole body and 5 rem thyroid at the site boundary."

Response:

The ONS Plan will be changed to give two separate emergency action levels for General Emergency No. 1. The EALS are: 1) 45 ALERT alarm and RIA 46 reading 4600 cpm 2) Dose calculations or field measurements result in a 2-hour dose projection at the site boundary equal to or greater than 1 Rem WB or 5 Rem Thyroid. A reading of 4600 cpm on the unit vent monitor will require a declaration of a General Emergency. An unmonitored release detected by the field monitoring teams that results in a two-hour dose projection of 1 Rem WB or 5 Rem thyroid will also require a declaration of a General Emergency.

Revision 89-02

1. NRC Comment:

(Site Area Emergency Nos. 3, 5, 10 and No. 13) These EALs were revised to delete the two minute dose rate values (500 mR/hr whole body and 2,5000 mR/hr thyroid). Although the change is acceptable for EALs Nos. 3, 5, and 10, the deletion from EAL No. 13 is inconsistent with NUREG-0654. The revision decreases the effectiveness of the Plan in that the EAL no longer considers short-term releases. Furthermore, such information is readily available in addition to direct field measurements.

Response:

Duke plans to eliminate the specific mention of time periods relating to a release of a radioactive effluent. The emergency action level will require a valid radiation indication monitor reading of 230 cpm for a site area emergency. The Technical Support Center will use the preferred method of 10-minute averaged data from the Operational Aid Computer provided by the TSC Data System. Control Room Operators will use the back-up method of an instantaneous readout from the radiation monitor strip chart located in the Control Room. Dose projections based on 230 cpm and average meteorological conditions will provide a dose rate at the site boundary greater than or equal to 50 mR/hr WB or 250 mR/hr thyroid. Since a site area emergency will be declared on a lower and a more conservative activity reading, the need to address a 2-minute high energy release is no longer necessary.