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SUBJECT: Forwards "Description of Proposed Mods for Generic Ltr 89-19..." re resolution of USI A-47, "Safety...."

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March 19, 1990

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Generic Letter 89-19

Gentlemen:

By letter dated September 20, 1989 pursuant to 10CFR50.54(f) the NRC issued Generic Letter (GL) 89-19, Request for Action Related to Resolution of Unresolved Safety Issue A-47 "Safety Implication of Control Systems in LWR Nuclear Power Plants." The results of analyses conducted for USI A-47 were provided in NUREG 1217 and 1218. GL89-19 recommends that Oconee Nuclear Station provide: 1) automatic steam generator overfill protection to mitigate main feedwater (MFW) overfeed events; and 2) automatic protection to prevent steam generator dryout. GL 89-19 also provides recommendations for schedules to implement modifications, and Technical Specifications. Notwithstanding previous actions at Oconee Nuclear Station to resolve USI A-47, I believe further enhancements can be made to overfill and dryout protection. My purpose in proposing enhancements is to bring USI A-47 to a timely closure.

On February 23, 1990 members of my staff met with the NRC staff to assure that Duke and the NRC had a common understanding of Oconee's planned modifications to enhance steam generator overfill and dryout protection. Consistent with the discussions in the meeting, Attachment 1 details the proposed modifications including design, testability, and separation criteria. In order to allow for timely implementation of the modifications, I request NRC approval of the proposed modifications by December 31, 1990. Unless informed to the contrary prior to December 31, 1990, I will consider the proposed modifications acceptable to the NRC.

For Oconee, the GL recommends implementation of modifications prior to startup from the first refueling outage after July 11, 1990. Consistent with the normal design process, these modifications will be implemented during the second refueling outage after the date of this letter, i.e. Oconee Unit 1 end of cycle 13 (August 91), Unit 2 end of cycle 12 (February 92), Unit 3 end of cycle 13 (July 92). This schedule is deemed acceptable due to the relative safety significance of these modifications, resource impact of other regulatory initiatives (i.e. ATWS, Regulatory Guide 1.97, SPIP, HED), and our normal modification process.

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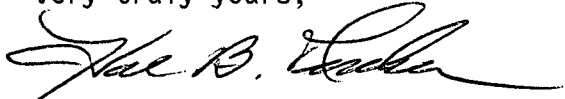
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March 19, 1990
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With regard to Technical Specifications, the GL recommends that "as part of future upgrades to Technical Specifications, licensees should consider including appropriate limiting conditions of operation and surveillance requirements in future Technical Specification improvements." Consistent with this recommendation, my staff is currently evaluating the proposed modifications to steam generator overfill and dryout protection against the criteria specified in the NRC Interim Policy Statement on Technical Specification Improvements (52 FR 3788). The results of this evaluation and any necessary Technical Specification changes will be forwarded for NRC review by March 19, 1991.

As a final note, I would like to comment on technical and regulatory aspects of GL 89-19. The GL recommendations were based on analyses provided in NUREG 1217 and 1218. By letter dated September 6, 1988 (H. B. Tucker to R. Baer (NRC/RES)) I provided comments on technical flaws in drafts of these NUREGs. My position is unchanged regarding these comments. As identified in GL 89-19, the regulatory basis for the GL is the NRC staff interpretation of 10CFR50, Appendix A GDC 13, 20 and 33. The Oconee licensing basis precedes the GDC. Modifications proposed herein are to facilitate timely resolution of USI A-47, in the event the proposed modifications are not found acceptable by the NRC, I reserve the right to revisit the technical and regulatory basis for GL 89-19.

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

Very truly yours,



H. B. Tucker

PJN111/td

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