

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9812300329 DOC. DATE: 98/12/21 NOTARIZED: NO DOCKET #
 FACIL: 50-269 Oconee Nuclear Station, Unit 1, Duke Power Co. 05000269
 AUTH. NAME AUTHOR AFFILIATION
 BURCHFIELD, J.E. Duke Power Co.
 MCCOLLUM, W.R. Duke Power Co.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 98-016-00: on 981124, three interpretations did not meet TSS. Caused by inadequate Mgt Policy. Reviewed refueling practices, revised practices & submitted TS change to assure compliance. With 981221 ltr.

DISTRIBUTION CODE: IE22T COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 9
 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD2-2 PD	1 1	LABARGE, D	1 1
INTERNAL:	ACRS	1 1	AEOD/SPD/RAB	2 2
	AEOD/SPD/RRAB	1 1	<u>FILE CENTER</u>	1 1
	NRR/DE/ECGB	1 1	NRR/DE/EELB	1 1
	NRR/DE/EMEB	1 1	NRR/DRCH/HICB	1 1
	NRR/DRCH/HOHB	1 1	NRR/DRCH/HQMB	1 1
	NRR/DRPM/PECB	1 1	NRR/DSSA/SPLB	1 1
	RES/DET/EIB	1 1	RGN2 FILE 01	1 1
EXTERNAL:	L ST LOBBY WARD	1 1	LITCO BRYCE, J H	1 1
	NOAC POORE, W.	1 1	NOAC QUEENER, DS	1 1
	NRC PDR	1 1	NUDOCS FULL TXT	1 1

NOTE TO ALL "RIDS" RECIPIENTS:
 PLEASE HELP US TO REDUCE WASTE. TO HAVE YOUR NAME OR ORGANIZATION REMOVED FROM DISTRIBUTION LISTS OR REDUCE THE NUMBER OF COPIES RECEIVED BY YOU OR YOUR ORGANIZATION, CONTACT THE DOCUMENT CONTROL DESK (DCD) ON EXTENSION 415-2083

FULL TEXT CONVERSION REQUIRED
 TOTAL NUMBER OF COPIES REQUIRED: LTTR 23 ENCL 23

C
A
T
E
G
O
R
Y

1

D
O
C
U
M
E
N
T



Duke Energy Corporation

Oconee Nuclear Station
P.O. Box 1439
Seneca, SC 29679
(864) 885-3107 OFFICE
(864) 885-3564 FAX

W. R. McCollum, Jr.
Vice President

December 21, 1998

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

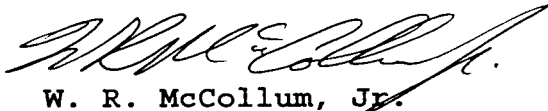
Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Licensee Event Report 269/1998-16, Revision 00
Problem Investigation Process No.: 0-098-5667

Gentlemen:

Pursuant to 10 CFR 50.73 Sections (a) (1) and (d), attached is Licensee Event Report 269/1998-16, concerning Technical Specification Interpretations conflicting with Technical Specification.

This report is being submitted in accordance with 10 CFR 50.73 (a) (2) (i) (B). This event is considered to be of no significance with respect to the health and safety of the public.

Very truly yours,



W. R. McCollum, Jr.

Attachment

9812300329 981221
PDR ADOCK 05000269
S PDR

Handwritten initials

Document Control Desk

Date: December 21, 1998

Page 2

cc: Mr. Luis A. Reyes
Administrator, Region II
U.S. Nuclear Regulatory Commission
61 Forsyth Street, S. W., Suite 23T85
Atlanta, GA 30303

Mr. D. E. LaBarge
U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, D.C. 20555

INPO Records Center
700 Galleria Parkway, NW
Atlanta, GA 30339-5957

Mr. M. A. Scott
NRC Resident Inspector
Oconee Nuclear Station

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Oconee Nuclear Station, Unit 1	DOCKET NUMBER (2) 05000 269	PAGE (3) 1 Of 7
---	--------------------------------	--------------------

TITLE (4) Three Interpretations Did Not Meet Technical Specifications Due To Inadequate Management Policy

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER(S)
11	24	1998	1998	16	00	12	21	1998	Unit 2	05000 270
									Unit 3	05000 287

OPERATING MODE (9) N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR (Check one or more of the following) (11)									
POWER LEVEL (10) 100	<input type="checkbox"/>	20.402(b)	<input type="checkbox"/>	20.405(c)	<input type="checkbox"/>	50.73(a)(2)(iv)	<input type="checkbox"/>	73.71(b)		
	<input type="checkbox"/>	20.405(a)(1)(i)	<input type="checkbox"/>	50.36(c)(1)	<input type="checkbox"/>	50.73(a)(2)(v)	<input type="checkbox"/>	73.71(c)		
	<input type="checkbox"/>	20.405(a)(1)(ii)	<input type="checkbox"/>	50.36(c)(2)	<input type="checkbox"/>	50.73(a)(2)(vii)	<input type="checkbox"/>	OTHER (Specify in Abstract below and in Text, NRC Form 366A)		
	<input type="checkbox"/>	20.405(a)(1)(iii)	<input checked="" type="checkbox"/>	50.73(a)(2)(i)(B)	<input type="checkbox"/>	50.73(a)(2)(viii)(A)				
	<input type="checkbox"/>	20.405(a)(1)(iv)	<input type="checkbox"/>	50.73(a)(2)(ii)	<input type="checkbox"/>	50.73(a)(2)(viii)(B)				
<input type="checkbox"/>	20.405(a)(1)(v)	<input type="checkbox"/>	50.73(a)(2)(iii)	<input type="checkbox"/>	50.73(a)(2)(x)					

LICENSEE CONTACT FOR THIS LER (12)	
NAME J.E. Burchfield, Regulatory Compliance Manager	TELEPHONE NUMBER AREA CODE (864) 885-3292

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)											
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		

SUPPLEMENTAL REPORT EXPECTED (14)	X	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (f yes, complete EXPECTED SUBMISSION DATE)						

ABSTRACT (Limit to 1400 spaces, i.e. approximately fifteen single-space typewritten lines) (16)

On November 24, 1998, Units 1 and 2 were at 100% power. Unit 3 was shutdown for a refueling outage. As a corrective action for LER 50-269/98-03, a review of Technical Specification (TS) Interpretations (TSI) was completed. The review determined that three TSIs conflicted with their associated TS. TS 3.1.2, Table 3.1-2, provides guidance concerning Reactor Coolant temperature and pump constraints while cooling down within prescribed limits. TSI 3.1.2.1 allows an additional pump configuration if certain requirements are met. TS 3.8.6 requires at least one door on the personnel and emergency hatches to be closed during fuel handling. The TSI allows the emergency hatch to be sealed with a temporary closure to allow for passage of Steam Generator inspection cables. TS 3.8.7 requires automatic isolation valves to be operable or at least one containment isolation valve must be closed. The TSI specifies the valves and operability requirements which are not specified in the TS. Certain requirements of TS 3.8.6 and 3.8.7 have not been met during fuel handling and refueling operations since the TSIs were issued in 1987. The root cause of this event is inadequate Management Policy, in that a TSI did not comply with certain requirements of the associated TS. Corrective actions include reviewing refueling practices and revising the practices or submitting a TS change to assure compliance.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
Oconee Nuclear Station, Unit 1	269	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 7
		1998	16	00	

EVALUATION:

Background

From time to time, Oconee has issued "Technical Specification Interpretation" documents to provide clarification, guidance, and policy for selected provisions of the Technical Specifications where experience indicates guidance is needed. After review and approval by site management, they are filed in the controlled copies of TS for reference. Technical Specification Interpretations are being eliminated as part of the conversion to Improved Technical Specifications.

Description of Event

On March 2, 1998, Oconee submitted LER 50-269/98-03 concerning an issue related to refueling outage frequency surveillances being performed at periods other than refueling outages. A corrective action associated with the event was to review Technical Specification Interpretations (TSI) against the Technical Specifications (TS) for other instances where conflicting issues may exist and to revise as necessary. On November 24, 1998, the review was completed and three issues were identified.

1. TSI on TS 3.1.2.1, Pressurization, Heatup and Cooldown Limitations and Table 3.1-2, Operational Guidance for Plant Cooldown. TS Table 3.1-2 states that only one Reactor Coolant Pump (RCP) may be run at Reactor Coolant System (RCS) [EIIS:AB] temperatures less than 200F, during cooldown. The TSI specifies that operation with one RCP per loop is permitted at temperatures less than 200F if certain conditions are met. Alternatively, if RCS pressure is maintained at least 20 psi below the cooldown Pressure/Temperature limit, one RCP per loop is permitted without any conditional requirements.

A Problem Investigation Process (PIP) Report identified this item in 1997 and corrective action indicates the TSI will be deleted by the Improved TS conversion. Current operating procedures prevent this mode of operation. TSI 3.1.2.1 is a historical item from 1990. Framatome (formerly Babcock and Wilcox) Document 51-1178914-00, "Oconee Cooldown Pressure/Temperature Limits - RCP Options", was utilized to incorporate a Technical Specification Interpretation (TSI). This document allowed

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
Oconee Nuclear Station, Unit 1	269	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	3 OF 7
		1998	16	00	

the use of one RCP/loop at RCS temperatures of less than 200F when certain conditions were met. The Framatome document gives two options for running one RCP/loop at less than 200F. The first option is to suspend the cooldown and allow equilibrium conditions to be established. This option does NOT violate the current TS. However, the second option states that cooldown may continue with one RCP/loop if RCS pressure is maintained at least 20 psi below the cooldown limit. This second option of the Framatome analysis was also captured in the TSI. This is in direct conflict with the requirements of the TS as it allows cooldown with greater than one RCP operating. Apparently, in capturing the Framatome analysis results in the TSI, it was not recognized that this second option was in conflict with the specific requirements of the TS.

2. TSI on TS 3.8.6, 3.8.7, Containment Conditions for Refueling: TS 3.8.6 requires one door on the Personnel and Emergency Hatches to be closed during fuel movement. The TSI allows the Emergency Hatch to be sealed by a temporary barrier which contains penetrations for outage related cables and services such as Steam Generator Eddy Current testing cables. This TSI conflicts with the TS.
3. TSI on TS 3.8.6, 3.8.7, Containment Conditions for Refueling: TS 3.8.7 requires that automatic containment isolation valves be operable or at least one must be closed. This TSI allows temporary closures or dedicated personnel assigned to close open valves in lieu of closed or automatic containment isolation valves. This TSI conflicts with the TS.

The TSI defines that TS 3.8.7 applies only to isolation valves with "automatic" actuation by radiation monitors. The TSI defines that other valves, such as Containment Isolation Valves (CIV) actuated by Engineered Safeguards (ES) [EIIS:JE], are not "automatic" for the purpose of TS 3.8.7 because ES is not required to be operable during fuel movement and because a fuel handling accident will not generate containment building pressures necessary to automatically actuate ES. The definition of Containment integrity in TS 1.7 addresses "all automatic containment isolation valves." It is apparent that scope of the TS 1.7 definition is broader than the definition of the TSI. Oconee does not have documentation that the definition in the TSI is acceptable to the NRC.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
Oconee Nuclear Station, Unit 1	269	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	4 OF 7
		1998	16	00	

Also, TS 3.8.7 does NOT address penetrations with manual valves. Therefore, while TS 3.8.6 and 3.8.7 appear to express an intent that the containment be sealed to some extent during fuel movement, containment integrity or "refueling closure" is NOT specifically required during fuel movement. Therefore, it appears that the intent of these TSs could be negated completely by allowing a number of manual CIVs to remain open throughout refueling. The TSI addresses this issue by applying additional requirements to maintain "refueling closure".

However, the TSI allows temporary closures or dedicated personnel assigned to close open valves in lieu of closed or automatic CIVs. While this interpretation may be consistent with NRC guidance (Generic Letter 91-08) relative to opening CIVs when containment integrity is required, it may not be in compliance with the existing TS 3.8.7 if the ES valves are considered automatic.

Items 2 and 3 (TSIs 3.8.6 and 3.8.7) were identified as potentially conflicting with TSs in September 1997 during disposition of TSIs, by the Improved TS project team. A formal, structured review process was used in the conversion of current TSs to Improved TSs. However, this formal process was not used in the evaluation of the disposition of TSIs as part of the Improved TS implementation project. No corrective action is required as this was a one time process to eliminate TSIs and the corrective action for the review of TSIs as defined in LER 50-269/98-03 is adequate.

A review of previous TSIs found that in 1987 a TSI was issued for TS 3.8 with specific guidance for TS 3.8.6 and 3.8.7. Revisions have been made to the TSIs for 3.8.6 and 3.8.7 as recent as 1996. The TSI 3.8.6 Bases state, in part, that visual inspection of the temporary enclosure over the emergency hatch satisfies the requirement that the hatch be "closed", which constitutes operability. The TSI 3.8.7 Bases state, in part, that automatic containment isolation valves are operable when they have the ability to close or are in the closed position.

The TSI review to satisfy the LER 50-269/98-03 corrective action for comparison of TSs to TSIs has concluded that items 2 and 3 remain inadequate for TS compliance. The temporary barrier is installed on the

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
Oconee Nuclear Station, Unit 1	269	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	5 OF 7
		1998	16	00	

emergency hatch and automatic containment isolation valves may be opened during fuel loading and refueling.

Therefore, Oconee has, in the past, met the guidelines in TSI 3.8.6 and 3.8.7 during refueling outages but not all the requirements of each associated TS.

Conclusion

Technical Specifications (TS) and the associated Interpretations were reviewed for conflicts. The three TS Interpretations (TSI) identified are related to operation during cooldown, heatup, or refueling. There are situations during these operations which required further guidance or explanation that was not described in the TS. Management chose to describe these special situations in TSIs. The Improved TSs will not contain TSIs. The Improved TSs are scheduled for implementation in 1999.

The root cause of this event is inadequate Management Policy, in that a policy contained in a TSI did not comply with requirements of the associated TS.

LER 50-269/98-03 documented a similar issue relating to refueling outage frequency surveillances performed at periods other than refueling outages. A corrective action from this event was to review TSIs against TSs for other instances where literal compliance issues may exist and revise as necessary. The corrective action in LER 50-269/98-03 resulted in identifying the items described in this LER. Therefore, this event is considered to be non-recurring.

There were no equipment failures, personnel injuries, radioactive releases or exposures associated with this event.

CORRECTIVE ACTION:

Immediate

None

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
Oconee Nuclear Station, Unit 1	269	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	6 OF 7
		1998	16	00	

Subsequent

1. It was verified that Operations procedures do not allow operation as defined in the Technical Specification Interpretation (TSI) 3.1.2.1 on Reactor Coolant Pump (RCP) operation.

Planned

1. Revise TSI 3.1.2.1 on Reactor Coolant Pump operation for pressurization, heatup, and cooldown to be in agreement with the Technical Specification (TS) for RCP operation.
2. Review refueling practices against TSs 3.8.6 and 3.8.7 requirements and revise either the refueling practices or TSs to ensure compliance prior to the next scheduled refueling outage.

Planned corrective actions 1 and 2 are considered to be NRC Commitment Items. These are the only NRC Commitment items contained in this LER.

SAFETY ANALYSIS:

Technical Specification Interpretations (TSI) 3.8.6 and 3.8.7 do not agree with the associated Technical Specifications (TS). These TSIs are associated with TSs that assure fuel loading and refueling operations are performed in a safe manner. The primary concern is preventing the release of radioactive material from the Reactor Building during a design basis Fuel Handling Accident. Neither Containment Integrity, nor containment closure are required for refueling operations. The Updated Final Safety Analysis Section 15.11, Fuel Handling Accident Analyses, takes no credit for containment or filtration of gases released. The analyses concluded that the potential dose release from containment would not exceed the 10CFR100 limits. The Emergency Hatch is sealed and procedural guidance is provided to quickly close any open valves should a fuel handling accident occur. During the time the TSIs have been implemented, there have not been any Fuel Handling Accidents as described in the UFSAR.

TSI 3.1.2.1 does not agree with TS 3.1.2 Table 3.1-2. The TSI option that allows two Reactor Coolant Pumps (one in each loop) to be run during cooldown less than 200F if Reactor Coolant System pressure is maintained at

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
Oconee Nuclear Station, Unit 1	269	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	7 OF 7
		1998	16	00	

least 20 psi below the cooldown limit does not agree with the TS. However, current Operating procedures do not allow this option. If more than 1 pump had been run using the pressure cooldown limit specified in the TSI, analyses by Framatome (formerly Babcock and Wilcox) has shown that no adverse affects would be realized.

The health and safety of the public were not affected by these TSI to TS compliance issues.