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SUBJECT: Responds to NRC 940921 ltr re deviation noted in insp repts 50-269/94-24,50-270/94-24 & 50-287/94-24.C/A:operability evaluation performed to evaluate integrity of piping should piping be exposed to recirculated RB sump fluid during LOCA.

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DUKE POWER

December 19, 1994

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

Subject: Oconee Nuclear Site
Docket Nos. 50-269, -270, -287
Inspection Report 50-269, -270, -287/94-24
Revised Reply to Notice of Deviation
Deviation 94-24-05

Dear Sir:

By letter dated September 21, 1994 the NRC issued a Notice of Deviation as described in Inspection Report No. 50-269/94-24, 50-270/94-24, and 50-287/94-24. By letter response from Duke Power Company dated October 19, 1994, Duke originally denied this Deviation based on an interpretation obtained from the Oconee Final Safety Analysis Report (FSAR). After further review and discussion with the NRC, Duke now acknowledges that this FSAR interpretation was incorrect. As a result, Duke is acknowledging the subject deviation per the attachment.

Pursuant to the provision of 10 CFR 2.201, I am resubmitting, per the attachment, a written response to the deviation identified in the above Inspection Report.

Very truly yours,

J. W. Hampton

Attachment

IE01
1/1

cc: Mr. S. D. Ebneter, Regional Administrator
U. S. Nuclear Regulatory Commission, Region II

Mr. L. A. Wiens, Project Manager
Office of Nuclear Reactor Regulation

Mr. P. E. Harmon
Senior Resident Inspector
Oconee Nuclear Site

Attachment 1
Reply to Notice of Deviation
Deviation 269,270,287/94-24-05

Final Safety Analysis Report, section 3.2.2.1, "System Classifications," states in part that those portions of the Engineered Safeguards Systems which may see recirculated reactor building sump water following a Loss of Coolant Accident are required to be Class II (Duke Class "B").

Contrary to the above, the portions of the high pressure injection system downstream of the high pressure injection (HPI) mini-flow recirculation manual isolation valves are classified as Class III (Duke Class "C"), even though this piping may see recirculated reactor building sump water following a Loss of Coolant Accident.

RESPONSE:

1. ***The reason for the deviation:***

Duke Power Company (DPC) acknowledges this deviation based on the following discussion:

During construction of Oconee Nuclear Station, the subject piping was constructed under the provisions of USAS B31.7, 7/67 ed., for Class III (Duke Class C) piping based on the interpretation provided by the Oconee Final Safety Analysis Report (FSAR), Section 3.2.2.1 (Current location), which discusses Duke's criteria for piping classification. The root cause of the misclassification of the piping was that the interpretation that the HPI pump recirculation line piping was to be classified Duke Class C vice Duke Class B was incorrect due to lack of clarifying information otherwise available in the FSAR.

2. ***The corrective steps which have been taken and the results achieved:***

An operability evaluation was performed to evaluate the integrity of the piping should it be exposed to recirculated reactor building sump fluid during a Loss of Coolant Accident (LOCA). The evaluation concluded that the subject piping could perform its intended safety function and therefore the piping was concluded to be operable. This evaluation was based in part on the fact that the current Inservice Inspection and Testing program for this piping, along with excellent material documentation, material traceability, welding records, welder qualification requirements, and over 20 years of reliable service have shown that this piping is highly reliable. No other corrective steps were required.

3. ***The corrective steps which will be taken to avoid further deviations:***

Duke Power Company will upgrade the HPI pump recirculation piping, along with other normally unisolable attached piping, to "Duke Class B / ISI Class B". Due to extreme hardship with lack of corresponding increase in level of safety and

health to the public, a Relief Request will be submitted in accordance with 10 CFR 50.55a (a)(ii). This Relief Request will demonstrate extreme hardship exists with performing the Construction Code required NDE with regards to excessive radiation exposure and NDE direct and supporting costs. This Relief Request will also demonstrate that the safety and public health benefits gained from this required NDE is relatively small as compared to the hardships involved.

4. ***The date when corrective actions will be completed:***

Specific corrective actions will be specified in the "Implementation Schedule" section of the Relief Request. The Relief Request will be submitted by 02 February 1995 since significant research is required to complete this request.