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72-0004 Duke Power Co., 50-269, 50-270 & 50-287, 07200004
AUTH.NAME AUTHOR AFFILIATION
HAMPTON,J.W. Duke Power Co.
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SUBJECT: Submits comments on NRC Insp Repts 50-269/94-99,50-270/94-99 & 50-287/94-99 for SALP rept for period 930502-941029.

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Duke Power Company
Oconee Nuclear Site
P.O. Box 1439
Seneca, SC 29679

J. W. HAMPTON
Vice President
(803)885-3499 Office
(803)885-3564 Fax

DUKE POWER

January 17, 1995

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, 50-279, 50-287, 72-4
NRC Inspection Report 50-269,-270,-287/94-99

Dear Sir:

By letter dated December 13, 1994, you transmitted the SALP report for the Oconee facility for the period from May 2, 1993 through October 29, 1994. A verbal presentation of that report was conducted in a public meeting on December 20, 1994 at the Oconee site.

I would like to thank you for the feedback provided in the SALP report. After reviewing the report, the Licensee has some comments we feel should be considered in the assessment of Plant Operations. These comments are provided in Attachment 1.

Please contact me, or members of my staff, if further information is needed.

Very truly yours,

J. W. Hampton
Site Vice President
Oconee Nuclear Station

cc: Mr. Stewart D. Ebneter
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, N.W., Suite 2900
Atlanta, GA 30323

Mr. L. A. Wiens, Project Manager
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

P. E. Harmon
Senior Resident Inspector
Oconee Nuclear Site

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cc: Mr. R. E. Carroll, Jr.
U. S. Nuclear Regulatory Commission
101 Marietta Street, N.W., Suite 2900
Atlanta, GA 30323

Attachment 1

Plant Operations

The Plant Operations section of the SALP report states "problems in procedure adherence outside of the Control Room continued from the last two assessment periods; these problems resulted in an inadvertent boron dilution and associated reactor trip, a subcritical reactor protection system actuation, and (in part) a reactor trip from flux to flow imbalance".

Although some examples of procedure adherence problems existed in Plant Operations during this SALP period, the events cited in the above statement are not entirely consistent with our records. For example, Oconee did not experience an inadvertent dilution event that resulted in a reactor trip. Also, the reactor trip from flux to flow imbalance resulted from spiking on the RCS flow transmitters. A planned boron dilution contributed to this trip in that it caused a slight increase in reactor power. Inspection Report 93-30 does not identify procedure adherence as a contributor to this trip. The Licensee requests that the NRC consider revising this statement to include examples which more accurately support your general comment on procedure adherence.

Page 2 of the SALP report states "examples of a non-conservative safety approach included: delayed resolution of a reactor coolant pump ground, which masked further ground conditions and alarms on all three units for nearly one month; and a post-trip review which did not adequately assess or explain some anomalous plant responses".

The Licensee asks that you reconsider characterizing the DC ground and post trip review as examples of a non-conservative safety approach. We feel they would be more properly labeled as corrective actions that were not sufficiently aggressive in your view and not "examples of a non-conservative safety approach". As you know, our DC power system is, by design, extensively cross-connected among units. Isolating portions to investigate grounds can place us in an LCO, and some troubleshooting steps can increase the risk of unit trips or transients. It is occasionally a judgement call as to the relative risk of operating with a known ground versus finding and repairing the ground.

In the area of post-trip assessment, we are not aware of a case, including the cited example, where we have restarted a unit with a significant safety question outstanding. Given the comprehensive nature of the assessment procedure, it can be a judgement call as to how much research and documentation is necessary on a given piece of data, to give a clear basis for restart.