



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

November 23, 1994

See p. 1

Mr. J. W. Hampton
Vice President, Oconee Site
Duke Power Company
P. O. Box 1439
Seneca, SC 29679

SUBJECT: OCONEE NUCLEAR STATION, UNITS 1, 2, and 3 PUMP AND VALVE INSERVICE TESTING PROGRAM, REVISION 21 (TAC NOS. M88403, M88404, AND M88405)

Dear Mr. Hampton:

By letters dated December 6, 1993, and January 11, 1994, Duke Power Company (DPC) submitted Revision 21 of the third ten-year interval pump and valve inservice testing (IST) program for the Oconee Nuclear Station, Units 1, 2, and 3. The third ten-year interval extends from July 1, 1992, to July 1, 2002. This program was developed utilizing the 1986 Edition of the ASME Section XI Code and supersedes all previous submittals. Revision 21 of the IST program was prepared in response to the NRC Safety Evaluation dated July 23, 1993, for Revision 20 of the IST program which was submitted January 4, 1993.

The staff, with technical assistance from Brookhaven National Laboratory (BNL), has reviewed the relief requests in the Revision 21 submittals. Our Safety Evaluation (SE) is enclosed. The staff adopts the evaluations and recommendations for granting relief or authorizing alternatives contained in the Technical Evaluation Report (TER) prepared by BNL which is attached to the enclosed SE. Relief is granted from, or alternatives are authorized for, the testing requirements which have been determined to be impractical to perform, where an alternative provides an acceptable level of quality and safety, or where compliance would result in a hardship or unusual difficulty without a compensating increase in quality or safety. A summary of the NRC's action on each relief request is provided in Table 1 of the enclosed SE.

Twenty-five relief requests were granted provisionally or on an interim basis and require additional action by DPC. Denied were (1) a portion of Relief Requests RR-VLV-11 and 12 relating to the disassembly and inspection of the reactor building spray pump suction and discharge valves, and (2) Relief Request GNR-VLV-07 regarding post-maintenance testing following packing adjustments for containment isolation valves. Section 4 of the TER summarizes the actions required of DPC resulting from the evaluation of the new and revised relief requests. For denied IST program relief requests, DPC should take action prior to performing the next regularly scheduled IST, or within 90 days for tests performed quarterly, to ensure that the testing of these components complies with the Code or to develop additional justification for not complying with the Code. Guidance on nonconforming conditions is provided in Generic Letter 91-18. The requests which are granted or authorized are

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acceptable for implementation provided the action items identified in Section 4 of the TER are addressed within one year of the date of the SE or by the end of the next refueling outage, whichever is later. Duke Power Company should provide information to the NRC within one year of the date of the SE transmittal letter describing actions taken, actions in progress, or actions to be taken, to address each of these items. Additionally, the granting of relief is based on the fulfillment of any commitments made by the DPC in its basis for each relief request and the alternatives proposed.

Program changes involving new or revised relief requests that meet the positions in GL 89-04, Attachment 1, should be submitted to the NRC but may be implemented provided the guidance in GL 89-04, Section D, is followed. Program changes that add or delete components from the IST program should also be provided to the NRC.

The reliefs granted pursuant to 10 CFR 50.55a (f)(6)(i), and the alternatives authorized pursuant to 10 CFR 50.55a (a)(3)(i) or (a)(3)(ii), are authorized by law and will not endanger life or property, or the common defense and security and are otherwise in the public interest given due consideration to the burden that could result if the requirements were imposed on your facility.

Sincerely,

Original signed by:

Herbert N. Berkow, Director
Project Directorate II-3
Division of Reactor Projects-I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-269, 50-270 and 50-287

Enclosure: Safety Evaluation Report w/attached
Table I and BNL Technical Evaluation Report

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Mr. J. W. Hampton

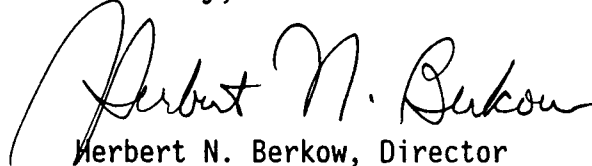
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