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 RECIPIENT NAME      RECIPIENT AFFILIATION  
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SUBJECT: Responds to NRC 940727 ltr re deviations noted in insp repts  
 50-269/94-19, 50-270/94-19 & 50-287/94-19. Corrective actions:  
 FSAR interpretation/position, considered as deviation by NRC,  
 not considered significant safety issue by DPC & NR.

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**DUKE POWER**

August 25, 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, -287/94-19  
Reply to Notice of Deviation

Dear Sir:

By letter dated July 27, 1994 the NRC issued a Notice of Deviation as described in Inspection Report No. 50-269/94-19, 50-270/94-19, and 50-287/94-19.

Pursuant to the provision of 10 CFR 2.201, I am submitting a written response to the deviations identified in the above Inspection Report.

Very truly yours,

J. W. Hampton

cc: Mr. S. D. Ebnetter, 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

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Attachment 1  
Reply to Notice of Deviation  
Deviation 269,270,287/94-19-01

Final Safety Analysis Report, section 3.2.2.1, "System Classifications," states in part that those portions of 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 Unit 1 and Unit 3 low pressure injection systems between check valves LP-29/30 and motor operated valves LP-21/22 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 acknowledges this deviation. This deviation resulted from the NRC Resident Inspectors' review of the piping classification associated with the Low Pressure Injection (LPI) suction piping. A Final Safety Analysis Report (FSAR) interpretation and Duke Power position was presented to the NRC Office of Nuclear Reactor Regulation (NRR). The NRR reviewed the Duke Power interpretation/position and determined that the subject piping should be classified Class II (Duke Class B) vice Class III (Duke Class C). Therefore the reason for the deviation is improper Engineering interpretation of the FSAR.

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

The FSAR interpretation/position was considered by the NRC as a deviation from the FSAR. Duke Power, as well as NRR, considers this item not to be a safety significant issue. Therefore, no immediate corrective actions are necessary.

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

The failure to meet code class requirement is limited to Units 1 and 3. The subject piping classification (Duke Class B) terminating at 1- and 3-LP-21, and 1- and 3-LP-22 will be extended to include the check valves 1- and 3-LP-29, and 1- and 3-LP-30. Check valves 1- and 3-LP-29, and 1- and 3-LP-30 were replaced recently with Class B valves. The section of piping between these valves already meets Class B requirements with exception of having received NDE on initial piping installation per the applicable

construction code. To fully meet the Class B requirement a Class B non-destructive examination (NDE) will be performed on the subject piping and valve welds. In addition, a thorough search will be conducted by Ocone Engineering for any additional piping which may have been misclassified with respect to the requirements for containing radioactive recirculated sump water.

4. The date when corrective actions will be completed:

The NDE on the subject LPI suction lines will be performed in the upcoming Unit 1 EOC 16 and Unit 3 EOC 15 refueling outages. This will be documented in the problem investigation program and tracked as a commitment item.

Attachment 2  
Reply to Notice of Deviation  
Deviation 269,270,287/94-19-02

Final Safety Analysis Report, section 3.2.2.1, "Systems Classifications," states in part that welds between classes of systems (Class I to II, I to III, or II to III) are performed and inspected in accordance with the rules of the higher class.

Contrary to the above, welds between classes of systems are not performed and inspected in accordance with the rules of the higher class. The licensee program performs and inspects welds between classes of systems in accordance with the rules for the lower class.

**RESPONSE:**

1. The reason for the deviation:

Duke Power acknowledges this deviation. A review of available records could not find any instances where Oconee has joined two different classes of piping by welding and intentionally inspected the weld to the requirements of the lower class except for instances where a valve has been welded in as the class break point. For valves, Oconee Engineering has interpreted the class break to occur at the valve seat.

Consistent with this interpretation, the welds for a valve at a class break application would receive the appropriate inspection for their respective classes. The reason was that since the class break occurred at the valve seat, there were no welds joining two different piping classes.

Additional reviews have concluded that this interpretation has been used since the time Oconee was constructed. Therefore, the reason for this deviation is insufficient clarification on this subject in the Final Safety Analysis Report (FSAR).

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

None

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

A change to Section 3.2.2.1 of the FSAR will be made to eliminate confusion on this issue by providing a clearer interpretation of the subject statement regarding inspection of welds connecting piping of different classification.

4. The date when corrective actions will be completed:

The proposed change will be submitted October 31, 1994 and will be included into the FSAR in the 1994 annual revision to be submitted in June, 1995.