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SUBJECT: Provides maint unavailability records in support of proposed Tech Specs for standby shutdown facility. Tables rept periods from Aug 1988 - Jul 1991.

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**DUKE POWER**

August 12, 1991

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

Subject: Oconee Nuclear Station  
Docket Nos. 50-269, -270, -287  
Standby Shutdown Facility (SSF)  
Technical Specification Revisions  
SSF and Diesel Generator Availability

Gentlemen:

On September 18, 1990, a meeting was held at Oconee Nuclear Station with personnel from the NRC to discuss the Technical Specification Amendment regarding the SSF, originally submitted on July 26, 1985 and last supplemented on March 5, 1991. During this meeting members of my staff agreed to provide maintenance unavailability records in support of the proposed technical specifications for the Oconee SSF. Accordingly, this letter transmits Standby Shutdown Facility availability information (Attachment), as requested by the NRC staff.

The attached tables report periods of unavailability of Standby Shutdown Facility (SSF) and SSF Diesel Generator from August 1988 through July 1991. Included are all scheduled outages, as well as all conditions which required the SSF to be declared out of service. However, conditions which affected a single unit only, but left the SSF able to perform its functions for the other units, are not addressed. The August 1988 to July 1991 time period was chosen because the records were readily available, and because this period captures a typical "cycle" of events which cause the SSF to become unavailable.

The SSF was taken out of service a total of 56 times, of which 31 were for scheduled monthly and annual surveillance (referred to as "PMs"). When possible, minor work which would have made the SSF inoperable was performed during scheduled outage periods.

The annual SSF Diesel PM's performed each November (5 day outages), and the CCW unwatering performed in mid 1989 (31 day outage), should be noted. The CCW unwatering for coating of

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pipng and other periodic maintenance occurs roughly every other refueling outage of Unit 2, or about once every 3 years. In addition, the first major teardown/overhaul of the SSF Diesel, required to meet manufacturer's warranty provisions, is scheduled for late 1991 or early 1992. This work is expected to take 2 to 3 weeks, and will be repeated at 10 year intervals.

This data is consistent with the Oconee PRA. Oconee's response to the Generic Letter 88-20 submitted on November 30, 1991 contained Oconee's PRA, which includes SSF reliability data (and PRA inputs) in Appendix 13, Table A.13-6. The PRA data is based upon SSF equipment availability records from initial operation through 1988, and is therefore complementary to the attached availability data. Although the data sets are somewhat different in nature, because the PRA data does not include instances of technical inoperability when equipment would actually have been able to perform its function, a rough comparison of the data shows good agreement.

Overall, high availability of the SSF and SSF Diesel is demonstrated, as is the need for the 7-day and special 45-day inoperability periods which are included in the proposed Technical Specifications for the SSF.

Should you have further questions, please feel free to contact S. G. Benesole of my staff at (704) 373-2101.

  
M. S. Tuckman

MAH149/mah

Attachment

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ATTACHMENT

SSF Unavailability: August 1988 - December 1988

<u>DATE</u>	<u>CAUSE FOR UNAVAILABILITY</u>	<u>PERIOD OF INOPERABILITY</u>		
		<u>DAYS</u>	<u>HRS</u>	<u>MIN.</u>
8-8	SSF diesel out of service for PM's prior to quarterly loaded run		3	35
8-9	Maint. adjusted packing on HVAC service water pump #1 and Perf. did their test	4	0	5
9-6	Monthly PM of Diesels		7	21
9-16	Perf. declared SSF ASWP inoperable	1	11	50
9-27	Both HVAC compressors OOS to replace bad compressor discharge pressure switch		0	39
10-3	Monthly PM of Diesels		10	45
11-7	Annual PM of Diesels	4	12	0
12-5	Monthly PM of Diesels		12	8
TOTAL END-OF-YEAR		11.43 days in a 5 month period		

SSF Unavailability: 1989

PERIOD OF INOPERABILITY

<u>DATE</u>	<u>CAUSE FOR UNAVAILABILITY</u>	<u>DAYS</u>	<u>HRS</u>	<u>MIN.</u>
1-2	Monthly PM of Diesels		18	3
2-5	SSF Aux. service water pump OOS for NSM	1	7	11
2-8	Unit 1 doing EPSL test		11	0
2-9	Unit 1 doing EPSL test		3	56
2-9	Unit 1 doing EPSL test		0	26
3-6	Monthly PM of Diesels		7	35
4-10	Monthly PM of Diesels		10	54
5-7	ASW pump and diesel work	4	13	6
5-22	CCW piping unwatered for inspection and coating	30	15	30
7-10	Monthly PM of Diesels		11	29
8-7	Monthly PM of Diesels	1	11	33
9-5	Monthly PM of Diesels		8	54
10-2	Monthly PM of Diesels		8	32
11-3	Annual PM of Diesels	4	4	35
11-3	Received fire alarm and found OTS1-3 bkr. tripped with a 50G (ground fault) relay flag		22	50
12-4	Monthly PM of Diesel		13	15
12-5	EPSL testing on Unit 3		2	50
TOTAL END-OF-YEAR			47.15 days	

SSF Unavailability: 1990

PERIOD OF INOPERABILITY

<u>DATE</u>	<u>CAUSE FOR UNAVAILABILITY</u>	<u>DAYS</u>	<u>HRS</u>	<u>MIN.</u>
1-8	Monthly PM of Diesels and I & E work		14	13
1-31	Diesel OOS due to generator meter calibration by Trans. Dept.		1	0
2-5	Monthly PM of Diesel		14	56
2-13	Handwheel on 2CCW-267 fell off during Perf. test on SSF ASW pump causing valve inop. and requiring vent pipe repairs on ASWP		22	0
3-5	Monthly PM of Diesel		7	50
4-2	Monthly PM of Diesel		8	55
4-10	Belt replacement of AHU's required		0	16
5-7	Monthly PM of Diesels		18	15
5-16	ES actuation on Unit 1 tripped OTS1-1. NSM work in progress		0	5
5-27	EPSL Testing on Unit-1		2	12
6-4	Monthly PM of Diesel. Problems were encountered on required engine vent system	2	4	38
7-2	Monthly PM of Diesel		11	44
7-16	SSF OOS due to switchyard isolation test. (NSM 52850 implemented)		1	21
8-2	Loss of power to Diesel Generator metering cubicle due to a short during perf. of IP/O/A/380/9		6	50
8-6	Monthly PM of Diesel		11	44
9-4	Monthly PM of Diesel		7	29
10-1	Monthly PM of Diesel		7	45
10-11	The normal battery charger output voltage was found by NLO rounds to be low. Issued W.R. and placed standby charger in service		1	28
10-17	XSF was placed on alternate power source Unit 2 outage switching logic testing procedure		1	25
10-18	Power switching logic testing on Unit 2 outage		4	1

<u>DATE</u>	<u>CAUSE FOR UNAVAILABILITY</u>	<u>DAYS</u>	<u>HRS</u>	<u>MIN.</u>
11-11	Annual PM of Diesel and ASW NSM	5	1	8
12-3	Monthly PM of Diesel		15	3
12-12	Required lubrication of SSF ASW pump		7	53
TOTAL END-OF-YEAR		14.17 days		

SSF Unavailability: January 1991 - July 1991

<u>DATE</u>	<u>CAUSE FOR UNAVAILABILITY</u>	<u>PERIOD OF INOPERABILITY</u>		
		<u>DAYS</u>	<u>HRS</u>	<u>MIN.</u>
1-7	Monthly PM of Diesel		6	50
2-4	Monthly PM of Diesel		9	3
3-4	Monthly PM of Diesel		11	49
3-13	Unit 3 outage test due to OTS-1 BKR problem		0	13
4-1	Monthly PM of Diesel		8	13
5-6	Monthly PM of Diesel		10	13
6-3	Monthly PM of Diesel		13	38
7-1	Monthly PM of Diesel		11	20
TOTAL END-OF-YEAR		2.96 days in a 7 month period		