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50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287
AUTH.NAME AUTHOR AFFILIATION
TUCKMAN,M.S. Duke Power Co.
RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Discusses meeting w/NRC on 911009 re facility tech specs & sys design concerning shutdown operations.

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Duke Power Company
Nuclear Production Dept.
P.O. Box 1007
Charlotte, N.C. 28201-1007

M.S. TUCKMAN
Vice President
Nuclear Operations
(704)373-3851

DUKE POWER

October 21, 1991

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

Subject: Oconee Nuclear Station
Units 1, 2, & 3
Docket Nos. 50-269, -270, -287

Gentlemen:

At the request of the NRC, we met with the staff on October 9, 1991 to address the Oconee Nuclear Station (ONS) Technical Specifications (TS) and system design related to shutdown operations. In preparation for this meeting we reviewed the ONS TS against existing Standard Technical Specifications (STS) and identified areas where enhancements could be made. The review showed that ONS generally meets STS shutdown requirements through our operating philosophy, and in most cases within procedures or other administrative programs. In order to formalize our operating philosophy, we will incorporate the identified enhancements into Selected Licensee Commitments (SLC) or TS interpretations (TSI).

It is our intent to implement these SLC's and TSI's by the next Unit 3 refueling outage, currently scheduled for June 1992. This schedule is based on a preliminary review of the proposed upgrades and the associated procedural revisions. Should delays occur, we will notify the NRC and provide a detailed schedule of implementation. For the Unit 2 refueling outage, scheduled for January 1992, our operating philosophy will incorporate (1) the STS definition of refueling shutdown (mode 6), which ties the refueling shutdown condition to reactor vessel head status, and, (2) the STS modes 5 and 6 decay heat removal requirements. This philosophy will be effected through outage work planning and managerial guidance, though the associated SLC's and procedures may not yet be in place. A formally documented TS interpretation regarding refueling shutdown, as described in (1), will be in place by the Unit 2 refueling outage.

Given that current STS requirements for shutdown operations are being effectively implemented as described above, it is considered premature to submit shutdown TS's at this time. Industry understanding of appropriate shutdown requirements is changing, and

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there are pending generic NRC initiatives in this area. Our intent is to provide additional TS's for shutdown operations, as appropriate, when NRC guidance and industry understanding are better defined. An exception is the requirements for electrical systems during shutdown operations, which have been incorporated into a draft rewrite of TS 3.7. This work on TS 3.7 is the subject of a meeting between Duke and the NRC Office of Nuclear Reactor Regulation, planned for November, 1991. The schedule for implementation of these electrical system requirements will be determined, in cooperation with the NRC, as part of the TS 3.7 rewrite effort.

Very Truly Yours,

M. S. Tuckman

M. S. Tuckman

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xc: S. D. Ebneter, Regional Administrator
U. S. Nuclear Regulatory Commission, Region II
101 Marietta Street, NW Suite 2900
Atlanta, GA 30323

D. B. Matthews, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

L. A. Wiens, Projects Manager
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

P. E. Harmon, Sr. Resident Inspector
Nuclear Regulatory Commission
Oconee Nuclear Station