



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

APR 07 1980

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In Reply Refer To:

RII:DRQ
50-269/79-37
50-270/79-34
50-287/79-37

Duke Power Company
Attn: W. O. Parker, Jr.
Vice President, Steam Production
Post Office Box 2178
Charlotte, NC 28242

Gentlemen:

Thank you for your letter of March 3, 1980, informing us of steps you have taken to correct an item of noncompliance concerning activities under NRC Operating License Nos. DPR-38, DPR-47 and DPR-55 brought to your attention in our letter of February 6, 1980.

We will examine your corrective actions with respect to this item of noncompliance during subsequent inspections. In your letter, you also took exception to certain items identified in our letter.

In answer to your response to Item A. of the Notice of Violation, we conclude that the loss of power to the KI Bus does constitute a specific and foreseen potential malfunction of a system. Similar failures of non-nuclear instrumentation (NNI) and/or integrated control system (ICS) power have occurred in the past, at Oconee as well as other Babcock and Wilcox designed facilities, which have led to transient situations involving loss of adequate information to the operator. In light of the previous documented experience with this loss of power problem and the potential severity of the consequences, it is our position that an adequate Emergency Procedure should have been provided prior to the November 10, 1979, event. Therefore, our position on Item A. of the Notice of Violation remains unchanged and the item remains an item of noncompliance.

However, no further response to this item is necessary as your letter outlined the corrective actions you plan to take. We will examine those corrective actions and plans with respect to the item of noncompliance during subsequent inspections.

In answer to your response to the Notice of Deviation dealing with prompt NRC notification, we believe the requirements of IE Bulletin 79-05B are explicitly clear in this area. It is our position that

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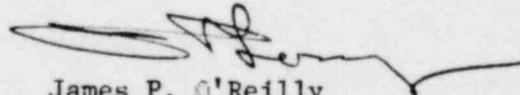
that Oconee Unit 3 was not in a controlled or expected condition of operation during the transient event which occurred on November 10, 1979. Due to the combination of a lack of adequate plant status information available to the operator and the lack of an adequate Emergency Procedure for this malfunction, the operators were not able to fully cope with the event in a safe manner. Although it is acknowledged that the operators took action during the early phase of the transient, it is also noted that the Reactor Coolant System cooldown limits were exceeded during the recovery phase as a result of equipment responding in an uncontrolled and unpredicted manner. Therefore, our position on the Notice of Deviation remains unchanged and the Deviation remains as originally identified.

Your procedures should be revised as necessary to assure notification of NRC within one hour of the start of any future similar type occurrences, as required by 10 CFR 50.72. Therefore, we request that, with regard to this deviation, that you provide us in writing within 20 days of our receipt of this letter your comments including a description of corrective actions that have been or will be taken by you, and the corrective actions which will be taken to avoid further deviations and the date corrective actions were or will be completed.

Should you desire further discussion of this matter we will be happy to arrange a meeting at a mutually convenient time in our Atlanta Offices.

We appreciate your cooperation with us.

Sincerely,



James P. O'Reilly
Director

cc: J. E. Smith
Station manager
Post Office Box 1175
Seneca, SC 29678