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March 21, 1983

Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30303

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Response to IE Bulletin 83-04

Dear Sir:

In response to an NRC letter dated March 11, 1983 which transmitted IE Bulletin 83-04, Failure of the Undervoltage Trip Function of Reactor Trip Breakers, please find attached a response for Oconee Nuclear Station.

I declare under penalty of perjury that the statements set forth herein are true and correct to the best of my knowledge, executed on March 21, 1983.

Very truly yours,

Hal B. Tucker

Hal B. Tucker

RLG/php
Attachment

cc: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. E. L. Conner, Jr.
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. J. C. Bryant
NRC Resident Inspector
Oconee Nuclear Station

IE11

Duke Power Company
Oconee Nuclear Station
Response to IE Bulletin 83-04

Date Bulletin Received - March 11, 1983

1. Perform surveillance tests of undervoltage trip function independent of the shunt trip function within 5 days of receipt of this Bulletin unless equivalent testing has been performed within 10 days. Those plants currently shut down should complete this item before resuming operation or within 10 days, whichever is sooner. Those plants for which on-line testability is not provided should complete this item at the next plant shutdown if currently operating.

   Response

   Oconee 1 - The undervoltage (UV) trip function was tested on March 10, 1983 during recovery from a reactor trip which occurred on March 9, 1983.

   Oconee 2 - The UV trip function was tested on March 10, 1983 during recovery from a reactor trip which occurred on March 10, 1983

   Oconee 3 - The UV trip function was tested on March 11, 1983 during restart from a forced outage.

2. Review the maintenance program for conformance to the latest manufacturer's recommendation, including frequency and lubrication. Verify actual implementation of the program.* If maintenance does not conform, initiate such maintenance within 5 days of receipt of this bulletin or provide an alternate maintenance program. Repeat the testing required in item 1 prior to declaring the breaker OPERABLE.

   * IE Bulletin 79-09, dated April 17, 1979, had as an attachment an extract of General Electric (GE) Service Advice Letter No. 175(CPDD)9.3 which is applicable to GE type AK-2 breakers.

   Response

   Duke Power has verified that the AK-2 breaker maintenance program is in conformance with the guidance contained in General Electric Service Advice Letter No. 175(CPDD)9.3. This program has been in place since February 1979.

3. Notify all licensed operators of the failure-to-trip event which occurred at Salem (see IE Bulletin 83-01) and the testing failures at San Onofre Units 2 and 3 described above. Review the appropriate emergency operating procedures for the event of failure-to-trip with each operator upon his arrival on-shift.

Response

The Oconee Superintendent of Operations was informed of the testing failures at San Onofre to the extent described in the Bulletin on March 11, 1983. This information was then relayed to the on-shift Shift Technical Advisor and was passed to all operators on-shift. Operators that were not initially available to receive this information will be informed by April 1, 1983. A copy of the Bulletin was provided on March 14, 1983 to responsible operating and maintenance personnel as well as to station management. The appropriate operator response actions have been reviewed with the operators.

4. Provide a written reply within 10 days of receipt of this bulletin:

   a. Identify results of testing performed in response to item 1. Plants without on-line testability should report the date and results of the most recent test.

      Response

      All testing performed as described in response to item 1 was satisfactorily completed.

   b. Identify conformance of the maintenance program to manufacturer's recommendation and describe results of maintenance performed directly as a result of this Bulletin in response to item 2.

      Response

      The maintenance program conforms to the manufacturer's recommendations. No additional maintenance was required to be performed directly as a result of this Bulletin.

   c. Provide a statement that provisions are in place to notify licensed operators of the Salem and San Onofre events and bring to their attention appropriate failure-to-trip emergency procedures upon their arrival on-shift.

      Response

      Duke considers that effective provisions are in place to perform this action.

   d. Provide a description of all RPS breaker malfunctions not previously reported to the NRC.

      Response

      Only one RPS malfunction had not been previously reported to the NRC. This occurred on December 17, 1978, during startup procedures on Unit 3. One of the AC AK-2 breakers failed to open when tested during a step of the startup procedure. The unit was at 1080 psi,

374°F. At the time of the event, it was not considered to be reportable. The exact failure mechanism was not determined. The breaker was replaced. This event preceded the sequence of events that occurred in early 1979 which resulted in GE issuing a service letter and the NRC issuing Bulletin 79-09. Failures of these breakers to function would be considered reportable pursuant to existing Technical Specifications.

e. Verify that procurement, testing and maintenance activities treat the RPS breaker and UV devices as safety related. Report the results of this verification to the NRC.

Response

The Oconee RPS design incorporates both AC and DC breakers. The AC breakers and the UV devices are considered to be fully safety-related. Replacement parts testing, and maintenance activities are accomplished in accordance with requirements for safety-related equipment. DC breakers and the UV devices are treated as safety-related although the DC breaker cabinets are not seismically qualified. Replacement parts, testing and maintenance activities are accomplished in accordance with requirements for safety-related equipment.

5. Any RPS breaker failure identified as a result of testing requested by this bulletin should be promptly reported to the NRC via the emergency notification system, regardless of the operating mode of the plant at the time of the failure.

Response

No RPS breaker failures were identified as a result of testing requested by this bulletin.