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84 JUL 18 P 13:29

Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Re: Oconee Nuclear Station
Docket Nos. 50-269, 270, 287
IE Bulletin 84-02

Dear Sir:

In response to IE Bulletin 84-02 dated March 12, 1984 concerning recent failures of the General Electric type HFA Relays in use in Class 1E Safety Systems, please find attached a report for Oconee Nuclear Station pursuant to Action Item 1d of the bulletin.

In addition to the written report requested per Action Item 1d, the results of a generic review of the general concerns expressed in the bulletin were also to be provided. This review is still in progress and the results will be provided shortly after the completion of the investigation.

I declare under penalty of perjury that the information contained herein is correct to the best of my knowledge as executed on July 13, 1984.

Very truly yours,

Hal B. Tucker

Hal B. Tucker

PFG/rhs

Attachment

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

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

Ms. Helen Nicolaras
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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DUKE POWER COMPANY
OCONEE NUCLEAR STATION

Response
to
IE Bulletin 84-02

Action Item 1a

Develop plans and schedules for replacing (1) nylon or Lexan coil spool-type HFA relays used in normally energized safety-related* applications and (2) nylon coil spool-type HFA relays used in normally de-energized safety-related applications. The replacement relays and any replacements made in the future should meet the requirements of the applicable IEEE standards. The replacement program for energized and de-energized relays should be performed on a "best efforts" basis during plant outages of sufficient duration. The entire replacement program should be completed within two years from the date of this bulletin.

The replacement schedule should consider the following recommended priority:

Nylon or Lexan normally energized in the reactor trip system
Nylon or Lexan normally energized in other safety-related applications
Nylon normally de-energized in the reactor trip system
Nylon normally de-energized in other safety-related applications

Response 1a

A station modification has been initiated to replace all GE type HFA 51A relays used in normally energized as well as normally de-energized safety-related applications. The scheduled completion date for the modification to replace all GE type HFA 51A relays used in safety related applications is March 1, 1986.

Action Item 1b

During the period before relay replacement, develop and implement surveillance plans that include:

(1) Monthly functional tests of all reactor trip system normally energized relays that verify relay contacts change state when the relay coil is de-energized;

(2) Visual inspections of all safety-related normally energized relays as soon as practical upon receipt of this bulletin. Thereafter, similar inspections should be accomplished in

conjunction with the monthly functional test. These visual inspections should verify that relay coils are not deteriorating (e.g., inspect coil bobbins for visible cracks or melting), and should confirm cleanliness of the relay pole pieces.

Response 1b

A review was performed and it was determined that there are no GE type HFA relays used in the Reactor Protective System (RPS). Therefore, monthly functional tests of the normally energized relays in the RPS trip systems is not applicable. An inspection of all GE HFA relays in safety-related applications was performed on June 18, 1984. The results of the inspection confirmed the cleanliness of the relay poles and verified that no relay coil deterioration had occurred. A monthly inspection will be performed on all GE HFA safety-related normally energized relays to assure that the relay coils are not deteriorating. This monthly inspection is to be initiated July 1984, and will continue until all GE HFA relays are installed in safety-related applications.

Action Item 1c

Provide a basis for continuing operation for the period of time until the normally energized relays are replaced. This basis should include a discussion of those measures addressed in Items 1a and 1b and any other preventive and/or corrective measures taken or planned.

Response 1c

The initial inspection confirmed the cleanliness of the relay poles and verified that no relay coil deterioration had occurred. The monthly inspection program initiated in July 1984, shall ensure that the relays will operate properly. There are no GE HFA relays installed in the RPS. Furthermore, a review of the maintenance records indicate that these relays have not been a problem. Based on the above discussion, the continued safe operation of Oconee during the period of time that it will take to replace all of the GE HFA relays used in safety-related applications is assured.