50-269

PDR per: Davide. LuBarge



UNITED STATES NUCLEAR REGULATORY COMMISSION **REGION II** 101 MARIETTA STREET, N.W., SUITE 2900 ATLANTA, GEURGIA 30323-0199

December 13, 1996

MEMORANDUM TO:

Herbert Berkow, Director Project Directorate II-2 Division of Reactor Projects I/II Office of Nuclear Reactor Regulation 0 Mm

FROM:

Ellis W. Merschoff, Director Division of Reactor Projects

SUBJECT : REQUEST FOR TECHNICAL ASSISTANCE - REVIEW OF ACCEPTABILITY OF LICENSEE PIPING MODIFICATION EVALUATION AT OCONEE (TIA 96-024)

In 1995, the NRC had identified that Duke Power Company did not have a complete fatigue analysis for some RCS piping as described in the Oconee Updated Final Safety Analysis Report (UFSAR). A deviation was issued in Inspection Report 50-259,260,287/95-09 addressing this issue. Subsequently, there was additional correspondence between the NRC and the licensee on this issue. The overall result of the correspondence was that by August 31, 1999, analysis would be performed of the existing reactor coolant system (RCS) piping (out to the first isolation valve).

Inspection Report 50-269,270,287/96-13 contained Violation 96-13-10, Failure to Perform an Adequate 10 CFR 50.59 Evaluation. The issue involved a modification that had recently been performed on the Unit 2 High Pressure Injection (HPI) piping that directly connected to RCS piping. During preparation and performance of the Unit 2 modification, the licensee had not properly considered cyclic load fatigue issues, indicating that this analysis was not needed until the August 31, 1999 date. Specific details of the issue were discussed with NRR during inspection and review.

As part of the corrective actions for the deficiency involving the HPI piping. the licensee revised the 10 CFR 50.59 evaluations for the Unit 2 and Unit 3 HPI piping modifications. Copies of those evaluations and associated calculations have been mailed to the NRC Project Manager. The evaluations rely on a comparative analysis that the licensee performed to address the effects of the modification.

Region II requests that NRR evaluate the acceptability of the revised evaluations. Specifically:

- 1. Are the calculations and methodology applied in the comparative analysis technically accurate?
- 2. Does the licensee's comparative analysis sufficiently support the conclusions in the revised 50.59 evaluation?

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- 3. Should the licensee perform any additional analysis in order to support the conclusions reached in the safety analysis?

Oconee Units 2 and 3 have the associated modification installed. Units 2 and 3 are currently scheduled for startup on January 6 and 31, respectively.

Docket Nos. 50-259, 50-260, 50-287 License Nos. DPR-38, DPR-47, DPR-55

cc: R. W. Cooper, RI W. L. Axelson, RIII J. E. Dyer, RIV R. W. Hernan, NRR L. D. Wert, RII R. V. Crlenjak, RII M. A. Scott, RII J. C. Barnes, RII