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DUKE POWER

December 26, 1996

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

Subject: Oconee Nuclear Station Docket Nos. 50-269, -270, -287 Supplemental Information Regarding Oconee Emergency Power Engineered Safeguards Functional Test Amendment Request

On December 11, 1996, Duke Power Company submitted an amendment to Facility Operating License Nos. DPR-38, DPR-47, and DPR-55 for Oconee Nuclear Station Units 1, 2, and 3, respectively. The amendment consists of proposed changes to the Updated Final Safety Analysis Report (UFSAR) regarding a one-time emergency power engineered safeguards (ES) functional test. Additional information regarding this proposed license amendment was also submitted to the NRC in letters dated December 17, 1996, and December 19, 1996.

During a conference call on December 24, 1996, the staff requested additional information regarding a December 19, 1996, ENS notification associated with the Standby Shutdown Facility (SSF). Valves LP-1 and LP-2 must be opened during an Appendix R fire event in order to cool down a unit to cold shutdown conditions. These valves are located in the decay heat drop line. During certain Appendix R fire scenarios, a portable control panel for each unit powered from the SSF is used to control selected valves. During recent valve maintenance, it was determined that the leads for valves 3LP-1 and 3LP-2 were reversed at both the valves and at the valve breakers. Subsequent investigation determined that the leads for valves 2LP-1 and 2LP-2 were also reversed. No other valves were affected. Since the leads were reversed at both locations, the valves were still functional and passed all surveillance tests from the main control rooms. However, if the portable control panel was used during an Appendix R event, the reversed leads would have caused the valves to be inoperable.

It should be noted that this issue is only related to an Appendix R event for valves that are operated by the portable panels. This SSF issue has no relationship to the SSF Auxiliary Service Water System function which is being credited as a backup source of feedwater during the emergency power ES functional test. The valves associated with operation of the SSF ASW System are operated from the SSF. Thus, they do not require the use of portable control panels and they are regularly tested by the Inservice Test (IST) program. Therefore, these valves are not susceptible to the failure mode identified in the December 19, 1996, ENS notification.

The equipment associated with the SSF is regularly tested to ensure its operability as directed by our testing and maintenance programs. The SSF diesel generator is tested monthly, the ASW pump is tested quarterly, and the associated valves are tested as directed by the IST program. The most recent test of the SSF diesel generator was on December 2, 1996 and the last quarterly test for the SSF ASW pump was on November 29, 1996. The SSF ASW valves needed to align feedwater to the Units 1 and 2 steam generators have also been tested since September 1996. As a conservative measure, Duke Power intends to stroke test these Units 1 and 2 SSF ASW valves again prior to the emergency power ES functional test.

In activition, a 24 hour test of the SSF was conducted in Septement of 1996. This test is described in the October 31, 1996, Duke Power submittal in response to the NRR and AEOD draft reports on the Oconee emergency power system.

In summary, there is no relationship between the December 19, 1996, ENS notification and operability of the SSF ASW System. Duke Power's testing of the SSF ASW System assures it is in a state of operational readiness for the emergency power ES functional test. Please contact J. E. Burchfield at (864) 885-3292 if there are any questions.

Very truly yours,

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