



BRUCE H HAMILTON
Vice President
Oconee Nuclear Station

Duke Power
ON01VP / 7800 Rochester Highway
Seneca, SC 29672

864 885 3487
864 885 4208 fax

January 31, 2006

U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Document Control Desk

Subject: Oconee Nuclear Station
Docket Numbers 50-269, 270, and 287
Response to Request for Additional Information
Pertaining to License Amendment Request to relocate
RBS flow instrument from Technical Specifications
Technical Specification Change (TSC) Number
2004-01, Supplement 1

In a submittal dated August 20, 2004, Duke Energy Corporation (Duke) proposed to amend Appendix A, Technical Specifications, for Facility Operating Licenses DPR-38, DPR-47 and DPR-55 for Oconee Nuclear Station (ONS), Units 1, 2, and 3. The proposed amendment revises Technical Specification (TS) 3.3.8, "Post Accident Monitoring Instrumentation," to eliminate TS requirements associated with the Reactor Building Spray (RBS) flow instruments commensurate with the importance of their revised post accident function.

The proposed change removes the RBS flow instrument from TS 3.3.8 based on it no longer being a Type A or Category 1 variable. Recent modifications plugged approximately 50% of the reactor building spray nozzles and replaced the flow metering orifice in each RBS header. This eliminated the need to manually throttle RBS flow rate within 15 minutes of accident initiation during the injection phase of post-accident operation, and the need to manually throttle RBS flow rate prior to transferring suction to the RBES. Therefore, the variable is now Category 2, Type D.

During a conference call between Duke (Graham Davenport and Boyd Shingleton) and NRC Staff (Leonard Olshan, John Nakoski, and Joe Burns), the NRC requested Duke to provide a qualitative statement regarding the 50.59 evaluation for the

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RBS flow modification and two calculations, OSC-7993 and OSC-5280, that support the modification.

The 50.59 safety evaluation for the RBS pump flow rate improvement modifications documents that RBS system operation was evaluated to demonstrate that the proposed change would not have an adverse effect on RBS pump performance, an adverse effect on LBLOCA long-term cooling requirements or have any adverse effect on the net positive suction head for the Low Pressure Injection pumps. The system resistances added by this modification are designed to provide RBS flow rates of 700 -1200 gpm, without requiring throttling. The range of flow rates and system performance within this range were evaluated in OSC-7993, RBS System Hydraulic Analysis for ON-X3105, and found to be adequate for injection and recirculation modes. The new flow rates were also used as input into OSC-5280, "FSAR Section 15.14.5 LBLOCA Long-term Cooling Requirements II," and no adverse effects due to this modification were found.

If there are any additional questions, please contact Boyd Shingleton at (864) 885-4716.

Very truly yours,

A handwritten signature in black ink that reads "Bruce Hamilton". The signature is written in a cursive, flowing style.

Bruce H. Hamilton, Vice President
Oconee Nuclear Site

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cc: Mr. L. N. Olshan, Project Manager
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Mail Stop O-14 H25
Washington, D. C. 20555

Mr. W. D. Travers, Regional Administrator
U. S. Nuclear Regulatory Commission - Region II
Atlanta Federal Center
61 Forsyth St., SW, Suite 23T85
Atlanta, Georgia 30303

Mr. M. C. Shannon
Senior Resident Inspector
Oconee Nuclear Station

Mr. Henry Porter, Director
Division of Radioactive Waste Management
Bureau of Land and Waste Management
Department of Health & Environmental Control
2600 Bull Street
Columbia, SC 29201

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Bruce H. Hamilton, being duly sworn, states that he is Vice President, Oconee Nuclear Site, Duke Energy Corporation, that he is authorized on the part of said Company to sign and file with the U. S. Nuclear Regulatory Commission this revision to the Renewed Facility Operating License Nos. DPR-38, DPR-47, DPR-55; and that all the statements and matters set forth herein are true and correct to the best of his knowledge.



Bruce H. Hamilton, Vice President
Oconee Nuclear Site

Subscribed and sworn to before me this 31st day of
January 2006


Notary Public

My Commission Expires:

6/12/2013