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SUBJECT: Submits rev to tech specs for license amends 229,230 & 226
 re upgraded ECCW sys. Util determined, info provided in 981015
 ltr can be applied to units 1 & 3 as well as unit 2.

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February 11, 1999

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Revision to Technical Specifications for the
Upgraded ECCW System
License Amendments 229, 230, 226
License Condition #1

In a letter dated April 24, 1998, the NRC issued Amendment Nos. 229, 230, and 226 to Facility Operating License DPR-38, DPR-47, and DPR-55 respectively. As stated in the change to Appendix C of the amended licenses, License Condition 1 was created which required Duke Energy Corporation (Duke) to:

- 1) provide comparisons of critical characteristics for the new equipment that is being installed by the ECCW upgrade with data from testing or from recorded earthquakes, in accordance with Section 2.3.4, Part 1 of GIP-2 and Section I.2.3.4, paragraphs 2, 3, and 4 of the staff's SSER dated May 22, 1992, or
- 2) qualify the new equipment using the existing methods in Section 3 of the Oconee UFSAR. This condition required that this information be provided to the NRC by July 15, 1998.

On June 30, 1998, Duke supplied NARE (New and Replacement Equipment) evaluation packages for new equipment associated with the Unit 2 Oconee ECCW upgrade project. The data was presented using the then-current format provided by the SQUG Steering Committee.

Subsequently, the format of the NARE data-sheet was revised and the Oconee Unit 2 ECCW upgrade project NARE evaluation

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packages were revised and re-submitted by letter dated September 16, 1998.

During review by the NRC Staff, questions were raised as to the clarity of some of the data presented. On October 15, 1998, the Unit 2 Oconee ECCW upgrade project NARE evaluation packages were re-submitted after revising wording on the forms to clarify and explain some of the site specific information. The format of the NARE data-sheets was not affected by this revision.

However, installation and NARE evaluation of the Units 1 & 3 components were not complete at the time of the June 30, 1998 and subsequent letters. Therefore, Duke committed to provide NARE evaluation packages for new equipment associated with the Units 1 & 3 ECCW system upgrades within 60 days of completion of refueling outages 3EOC17 and 1EOC18.

The Unit 3 ECCW upgrade implementation is now complete and the design of Unit 1 is sufficiently complete to assure that the systems and components on Units 1 and 3 are essentially identical to Unit 2 with respect to the NARE evaluation. One cabinet was wall mounted rather than floor mounted. During a conference call, the NRC Staff concurred that this difference in mounting was not a significant difference with respect to their review. Therefore, Duke has determined that the information provided in the October 15, 1998 letter can be applied to Units 1 and 3 as well as Unit 2.

Since the NRC staff has been provided the information needed to complete their review, Duke considers License Condition 1 contained in License Amendments 229 and 226 of Facility Operating Licenses DPR-38 and DPR-55, respectively, to be complete.

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If there are any questions regarding this submittal, please contact Randy Todd at (864) 885-3418.

Very truly yours,



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