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MCCOLLUM,W.R. Duke Power Co. *See Proposed Change To Tech Specs*  
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SUBJECT: Supplemental application for 981002 LAR for amend to  
licenses DPR-38,DPR-47 & DPR-55 use of reactor building  
overpressure to assure net positive suction head for reactor  
building spray pumps.Revised calculation,included.

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May 13, 1999

U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
ATTENTION: Document Control Desk

SUBJECT: Duke Energy Corporation  
Docket No(s). 50-269, -270, -287  
Oconee Nuclear Station Units 1, 2, and 3  
Supplement to Proposed Amendment to the Facility  
Operating License Regarding Reactor Building  
Overpressure to Assure Net Positive Suction Head  
for the Reactor Building Spray Pumps

This letter supplements the License Amendment Request (LAR) submitted on October 2, 1998, regarding the use of reactor building overpressure to assure Net Positive Suction Head (NPSH) for the Reactor Building Spray (RBS) Pumps. This supplement is provided based on discussions held with the Staff during teleconferences on February 25, 1999 and March 9, 1999.

The Staff requested, during the February 25, 1999 teleconference, that the LAR and supporting NPSH calculation be revised to eliminate the use of the high temperature correction factor to facilitate timely approval of the LAR. Duke Energy Corporation (Duke) agreed to do so but maintains the position that the use of the high temperature correction factor is justified in this case. The Staff agreed to respond to Duke regarding the acceptability of applying the high temperature correction factor in accordance with an accepted industry standard. The Staff also requested that the NPSH calculation be revised to show explicitly what the available NPSH would be when crediting the requested 2.2 psi of overpressure. The calculation has been revised as requested and is included with this letter as Attachment 5.

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During the follow-up teleconference held on March 9, 1999, Duke requested that the 2.2 psi of overpressure credit be applied to the Low Pressure Injection (LPI) pumps in addition to the RBS pumps. The current analysis indicates that it is not necessary to credit overpressure to assure LPI NPSH. However, the additional margin gained by crediting overpressure for the LPI pumps will compensate for the margin lost by the elimination of the high temperature correction factor. The Staff agreed that it would be acceptable to supplement the submittal to reflect crediting 2.2 psi of overpressure for the LPI pumps.

Pursuant to 10 CFR 50.90, this letter submits a supplement to the October 2, 1998 LAR for Facility Operating License Nos. DPR-38, DPR-47, and DPR-55 for Oconee Nuclear Station Units 1, 2, and 3, respectively. The attachments to the original October 2, 1998 LAR are attached and have been updated appropriately to reflect the changes described above. Additionally, editorial changes have been made which include updating Technical Specification references to the Improved Technical Specifications and correcting a typographical error discovered in the reactor building free volume. Revision bars indicate changes from the original LAR.

This LAR contains the following attachments:

Attachment 1 provides marked-up UFSAR pages that reflect the results of the current NPSH analysis. Revisions have been made to incorporate crediting overpressure for both the RBS and LPI pumps. Table 6-33 has been revised in its entirety to provide a simplified tabulation of the current NPSH requirements.

Attachment 2 provides the description and technical justification of the proposed changes to the Updated Final Safety Analysis Report (UFSAR). This attachment has been revised to incorporate crediting overpressure for the LPI pumps and eliminate the use of high temperature correction factors.

Attachment 3 documents the determination that the amendment contains No Significant Hazards Considerations pursuant to 10 CFR 50.92. The No Significant Hazards Considerations has been revised to cover the revisions made to attachment 1 and 2. The final conclusion that there are no significant hazards involved in this LAR remains unchanged.

Attachment 4 provides the basis for the categorical exclusion from performing an Environmental Assessment/Impact Statement pursuant to 10 CFR 51.22(c)(9). No revisions were made to this attachment.

Attachment 5 contains Duke calculation OSC-4467 Revision 8. Revision 6 to this calculation was provided to the Staff by letter dated November 20, 1998 in response to Question 1 of a Request for Additional Information (RAI) dated October 26, 1998.

Questions 2 and 3 of the October 26, 1998 RAI deal with the use of the high temperature correction factor. Since this LAR Supplement eliminates the use of the high temperature correction factor, the responses to Questions 2 and 3 provided in the November 20, 1998 letter are no longer applicable to this LAR. Similarly, the graphs provided in response to Question 6 of the RAI reflect the use of the high temperature correction factor. While the graphs no longer present the analysis exactly, they are still representative of the analysis for this LAR. The responses to the remaining two questions (questions 4 and 5) of the October 26, 1998 RAI remain applicable to this LAR.

In accordance with Duke administrative procedures and the Quality Assurance Program Topical Report, this LAR Supplement has been previously reviewed and approved by the Oconee Plant Operations Review Committee and the Duke Corporate Nuclear Safety Review Board.

Pursuant to 10 CFR 50.91, a copy of this LAR Supplement is being sent to the State of South Carolina.


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Inquiries on this matter should be directed to J. E.  
Burchfield, Jr. at (864) 885-3292.

Very truly yours,

A handwritten signature in dark ink, appearing to read "W. R. McCollum, Jr.", is written over the typed name.

W. R. McCollum, Jr., Site Vice President  
Oconee Nuclear Site

Attachments

U. S. Nuclear Regulatory Commission

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xc w/attachments:

L. A. Reyes

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2600 Bull Street

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May 13, 1999

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AFFIDAVIT

W. R. McCollum, Jr., being duly sworn, states that he is Site Vice President of Duke Energy Corporation; that he is authorized on the part of said corporation to sign and file with the Nuclear Regulatory Commission this revision to the Oconee Nuclear Station License Nos. DPR-38, DPR-47, and DPR-55; and that all statements and matters set forth therein are true and correct to the best of his knowledge.



W. R. McCollum, Jr., Site Vice President

Subscribed and sworn to me: 5-13-99  
Date

Notary Public: Lynea M Coleman

My Commission Expires: Nov. 21, 2005  
Date

SEAL