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SUBJECT: Describes Duke Energy Corp proposed process for revising NRC-approved topical reports, describing methodologies for core reload design & licensing basis thermal-hydraulic transient analysis.

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April 14, 1998

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

Attention: Document Control Desk

Subject: McGuire Nuclear Station  
Docket Numbers 50-369 and -370  
Catawba Nuclear Station  
Docket Numbers 50-413, and -414  
Oconee Nuclear Station  
Docket Numbers 50-269, -270 and -287  
Process for Revising NRC-Approved Topical Reports

The purpose of this letter is to describe Duke Energy Corporation's proposed process for revising NRC-approved topical reports that describe the methodologies for core reload design and licensing basis thermal-hydraulic transient analysis. This process is intended to meet our understanding of the NRC staff's expectations for when topical report revisions are to be submitted for NRC review, and when the revisions can be implemented without NRC review. If the process described below is not an appropriate approach for managing topical report revisions, please inform us at your earliest convenience.

Item #1: When is submittal of a topical report revision for NRC review and approval necessary?

Duke Proposed Process: A topical report revision must be submitted for NRC review if it involves any new codes or models that have not been previously reviewed by the NRC, or if it involves a new modeling approach that produces less conservative results. Topical report revisions that correct errors or that involve modeling approaches that produce more conservative results do not require NRC review. Minor code revisions that do not include new models do not require topical report revisions.

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Item #2: How should topical report revisions that do not meet the above criteria for NRC review and approval be managed?

Duke Proposed Process: Any topical report revision that does not meet the above criteria for NRC review (i.e. an internal revision) should be documented with a 50.59 evaluation to demonstrate that no unreviewed safety question exists. The changes associated with this revision can then be implemented. An internal revision will not be submitted to the NRC, but the changes in all internal revisions will be identified and included in the next revision that does require NRC review.

Item #3: How detailed must the list of COLR-related topical reports in the technical specification be?

Duke Proposed Process: Any COLR-related topical report and revision which is reviewed and approved by the NRC must be in the technical specification list along with its revision number and date. Only one version (e.g. the proprietary approved version) needs to be listed.

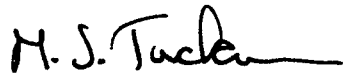
Item #4: When is the technical specification list of COLR-related topical reports required to be updated?

Duke Proposed Process: A technical specification change should be requested to update the list whenever a new COLR-related topical report or revision is approved by the NRC. This revision should be initiated within a reasonable time period after receiving the NRC SER. Since this list is administrative in nature and the SER is the actual regulatory approval document, a lag between implementing the COLR-related topical report or revision and updating the technical specification list may occur. Provided that the SER has been received, the topical report or revision can be implemented prior to the technical specification revision.

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Any questions regarding this matter can be forwarded to  
K. S. Canady, Manager - Nuclear Engineering Division at  
(704) 382-4712.

Very truly yours,

A handwritten signature in black ink, appearing to read "M. S. Tuckman", with a long horizontal flourish extending to the right.

M. S. Tuckman

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