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SUBJECT: Submits util position on SG tubing surveillance program TS.
 Concurrence from NRR re applicability of TS 4.17
 requirements,requested.

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January 26, 1998

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Steam Generator Tubing Surveillance Requirements

During power escalation following the Oconee Unit 1 refueling outage, a primary to secondary leak was identified in the Unit 1 "A" steam generator. Oconee Unit 1 was shut down on December 28, 1997, to repair the primary to secondary leak in the Unit 1 "A" steam generator. The primary to secondary leakage rate exceeded the Technical Specification limit of 150 gallons per day.

During ensuing discussions with the NRC Staff, Duke Energy Corporation (Duke) presented its interpretation of the applicability of the steam generator tubing surveillance program requirements in Technical Specification 4.17.4.d. Technical Specification 4.17.4.d requires an inspection of selected steam generator tubes after the occurrence of primary to secondary leakage in the steam generator in excess of 150 gallons per day. Duke personnel indicated that if the primary to secondary leakage was the result of a degraded steam generator tube, steam generator tube inspections would be performed in accordance with the Technical Specification 4.17.4.d requirements.

For situations where the primary to secondary leakage was occurring from a degraded plug or tube to tubesheet weld, Duke personnel indicated that the Technical Specification 4.17.4.d requirements did not apply. This was due to the fact that the Technical Specification 4.17.4.d requirements involved inspections to be performed for situations where the leakage was the result of a leaking tube. No steam generator tube inspection requirements are contained in Technical Specification 4.17.4.d for primary to secondary leaks in the steam generator that are caused by situations other than a leaking tube.

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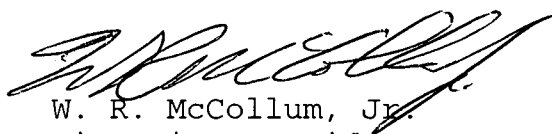
A review of the initial issuance of steam generator tubing surveillance program Technical Specifications, which were approved on February 22, 1980, indicates that the focus of the inspections was only on the steam generator tubes. In addition, the correspondence that was associated with the initial steam generator tubing surveillance Technical Specifications was reviewed. This review concluded that Technical Specification 4.17.4.d involved inspections of the steam generator tubing and did not require inspections of plugs or tube to tubesheet welds following a tube leak in excess of the Technical Specification requirements.

A review of the steam generator tubing surveillance program Technical Specifications indicates that the program requirements are only for the steam generator tubes. The applicability of Technical Specification 4.17 indicates that the requirements apply to the surveillance of tubing of each steam generator. In the objective section of Technical Specification 4.17, the objective of the steam generator tubing surveillance program is to ensure the integrity of the steam generator tubing through a defined inservice surveillance program. Other examples that limit the focus of Technical Specification 4.17 to only the steam generator tubes are contained in the sections for definitions, acceptance criteria, inspection sampling and reporting requirements.

As requested by the NRC Staff and in accordance with the guidance provided in Information Notice 97-80, Duke Energy Corporation is submitting its position on the Technical Specification interpretation and requesting concurrence from the Office of Nuclear Reactor Regulation regarding the applicability of the Technical Specification 4.17 requirements.

If there are any questions about this submittal, please contact Michael Bailey at (864) 885-4390.

Very truly yours,



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

U. S. Nuclear Regulatory Commission
January 26, 1998

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MEB

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