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SUBJECT: Submits plans for License Renewal Technical Info Topical
 Rept for review & aproval & requests 10FR 170 fee exemptio.

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DUKE POWER

February 2, 1996

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
License Renewal Technical Information Topical Report
Submittal Plan and Request for Waiver of Review Fees

Duke Power Company has provided support to the NRC and industry in the development of a stable and efficient license renewal process for several years. Our objective has been, and continues to be, to maintain license renewal as a viable option for our nuclear power plants.

In order to continue the development of a predictable and stable license renewal process, Duke Power plans to submit for NRC review and approval a report entitled "Oconee Nuclear Station, License Renewal Technical Information Topical Report" that will contain the technical information required by 10 CFR 54.21 (a), (b) and (c). (The FSAR Supplement required by 10 CFR 54.21 (d) will not be submitted with the Topical Report.) Duke is planning to submit various sections of the Topical Report beginning in July 1996 as described in the attached submittal plan with all sections submitted by first quarter 1997. Once approved, the Topical Report would be utilized as Exhibit A of a Renewal Operating License Application.

Duke Power requests relief from the Part 170 review fees that would be associated with the NRC review and approval of this Topical Report. As we have discussed with the NRC, the Topical Report will satisfy the NRC's criteria for relief from fees under Part 170. Under 10 CFR §§170.3 and 170.21 note 4, fees are not assessed for reports submitted to the NRC "[a]s a means of exchanging information between industry organizations and the NRC for the purpose of supporting generic regulatory improvements or efforts." In adopting this provision, the NRC explained that such "reports, although submitted by a specific organization, support NRC's development of generic guidance and regulations (e.g. rules, regulatory guides and policy statements)..." 59 Fed. Reg. 36895, 36904 (July 20, 1994).

It is our understanding that the technical information provided in the Topical Report will be used by the NRC Staff to support its development of the Standard review Plan (SRP) for license renewal. The technical information will also assist the NRC in its ongoing

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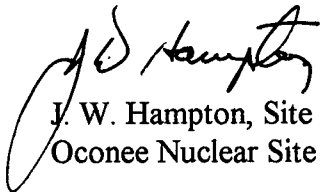
development of supplementary regulatory guidance for implementing the revised 10 CFR Part 54. The Topical Report will follow the guidance contained in NEI 95-10, "Industry Guidelines for Implementing the Requirements of 10 CFR Part 54 -- The License Renewal Rule," which is expected to be endorsed by the NRC in a Regulatory Guide.

Among other things, the Topical Report will demonstrate the adequacy of certain existing programs to manage the effects of aging as required by Part 54, and also help to establish what additional actions may be necessary and acceptable in areas not covered by existing aging management programs. In these ways, the Topical Report will be of substantial generic benefit to the NRC, as well as the industry and the public at large, in supporting the NRC's formulation of its regulatory guidance and SRP for implementing the revised process for license renewal.

From a broader perspective, Duke Power expects that the approved Topical Report would show that the revised Part 54 can be implemented in a technically sound and efficient manner and thereby further the NRC's policy of providing a stable and predictable process for license renewal. The Approved Topical Report will help demonstrate that an operating license can be safely extended for an additional period of operation. The safe and economical extension of operating licenses has been recognized as a vital component of the nation's energy policy.

We are available to meet and discuss with the NRC further details supporting the attached Topical Report submittal plan, as well as the 10 CFR 170 fee exemption request at your convenience. If you have any questions, please contact Robert Gill at (704) 382-3339.

Very truly yours,



J. W. Hampton, Site Vice President
Oconee Nuclear Site

RLG
Attachment

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**Oconee Nuclear Station
License Renewal Technical Information
Topical Report**

Submittal Plan

Submittal Description	Submittal on or before
Identification of time-limited aging analyses (TLAA) and exemptions. [§54.21(c)]	July 31, 1996
Reactor Building *	July 31, 1996
Electrical and I&C Components *	4th Quarter 1996
Structures and Civil Components *	4th Quarter 1996
Reactor Coolant System *	1st Quarter 1997
Mechanical Components *	1st Quarter 1997

* Note - Each of the submittals includes the identification of structures, components and component groups subject to aging management review [§54.21(a)(1), (2)], the aging management review of these structures, components and component groups [§54.21(3)] and applicable TLAA evaluations [§54.21(c)].