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RECIP. NAME RECIPIENT AFFILIATION  
DENTON, H. R. Office of Nuclear Reactor Regulation, Director  
STOLZ, J. F. Operating Reactors Branch 4

SUBJECT: Responds to 820920 Generic Ltr 82-16 re Tech Specs  
addressing NUREG-0737 items. Review indicates several  
requirements already incorporated while other items still  
under review.

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December 28, 1982

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Mr. John F. Stolz, Chief  
Operating Reactors Branch No. 4

Subject: Oconee Nuclear Station  
Docket Nos. 50-269, -270, -287

Dear Sir:

In response to the NRC letter dated September 20, 1982 (Generic Letter 82-16) which requested Technical Specifications to address NUREG-0737 items, the attached information is provided.

A careful review of the existing Technical Specifications of Oconee indicates that several of the requirements included in Generic Letter 82-16 have already been incorporated. Several other items are still under active review and appropriate Technical Specifications will be provided upon completion of the review. Finally, the remaining items have been reviewed and it has been determined that Technical Specifications for those are unnecessary, and thus, no proposed Technical Specifications are provided in this submittal.

Very truly yours,

*H.B. Tucker / HBT*

Hal B. Tucker

RLG/php  
Attachment

cc: Mr. James P. O'Reilly, Regional Administrator  
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NRC Resident Inspector  
Oconee Nuclear Station

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DUKE POWER COMPANY  
OCONEE NUCLEAR STATION

Response to NRC Generic Letter 82-16  
NUREG-0737 Technical Specifications

(1) STA Training (I.A.1.1.3)

Per Generic Letter, no response is requested to this item.

(2) Limit Overtime (I.A.1.3)

By letter dated July 23, 1982, Duke provided a response to the NRC Generic Letter 82-12, dated June 15, 1982. Duke strongly objects to the proposed action specified with respect to its being included in Technical Specifications. The basis for this position was provided in our letter.

(3) Short Term Auxiliary Feedwater System Evaluation (II.E.1.1)

(4) Safety Grade AFW System Initiation and Flow Indication (II.E.1.2)

Appropriate Technical Specifications to address these two items have been previously incorporated into the Oconee Specifications.

(5) Dedicated Hydrogen Penetrations (II.E.4.1)

Existing Oconee Technical Specifications and procedures effectively address this item.

(6) Containment Pressure Setpoint (II.E.4.2.5)

By letter dated July 15, 1981, the NRC found that the requirements of this item were met by Oconee. Thus, no response to this item is required.

(7) Containment Purge Valve (II.E.4.2.6)

This item is under separate review by both Duke and the NRC. As such, no response to this item is required.

(8) Radiation Signal on Purge Valves (II.E.4.2.7)

This item is under separate review by both Duke and the NRC. The purge system is only operated at cold shutdowns and refueling outages. Thus, no response to this item is required.

(9) Upgrade B&W AFW System (II.K.2.8)

Response to items 3, 4 applies.

(10) B&W Thermal-Mechanical Report (II.K.2.13)

This item is under active review by both Duke and the NRC. As such, no response to this item is required.

(11) Reporting SV and RV Failures and Challenges (II.K.3.3)

Duke does not consider it necessary or appropriate to be including this item in Technical Specifications. The basis of this position is provided in the following.

1. Plant changes made as a result of TMI such as upgraded Emergency Feedwater System, and reduced RPS overpressure trip setpoints have effectively reduced challenges to the safety and relief valves.
2. The results of the EPRI Relief and Safety Valve test program are being used to assure the operability of these valves, if ever challenged.
3. Operating experience over the past three years at Oconee has indicated no challenges to these valves.
4. Existing Technical Specifications effectively address degradation of the reactor coolant system pressure boundary of which these valves form a part. Thus, failures of these valves to fulfill their safety function would be reported.
5. The proposed rule to revise Licensee Event Report (10 CFR 50.73) which was issued for comment May 6, 1982, would, when issued as a final rule, supersede existing Technical Specification reporting of operational experience.
6. Annual reports are no longer required by Oconee Technical Specifications as a result of a License Amendment issued January 30, 1978. Reporting these events either monthly or annually duplicates information that is provided by LERs. The reporting of challenges to and failures of relief and safety valves has not been explicitly addressed, but is implicitly included within the new reporting requirements.
7. The original basis for this requirement appears to be founded on establishing and maintaining an historical data base. With due consideration to the above statements, it is considered that inclusion of this reporting requirement in Technical Specifications is an unnecessary administrative effort and duplicates information already required to be reported.

(12) Anticipatory Trip on Turbine Trip (II.K.3.12)

Not applicable to Oconee.