

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8805090205      DOC. DATE: 88/04/22      NOTARIZED: NO      DOCKET #  
 FACIL: 50-269 Oconee Nuclear Station, Unit 1, Duke Power Co.      05000269  
       50-270 Oconee Nuclear Station, Unit 2, Duke Power Co.      05000270  
       50-287 Oconee Nuclear Station, Unit 3, Duke Power Co.      05000287

AUTH. NAME      AUTHOR AFFILIATION  
 TUCKER, H.B.      Duke Power Co.  
 RECIP. NAME      RECIPIENT AFFILIATION  
                   Document Control Branch (Document Control Desk)

SUBJECT: Requests NRC review until 870814 amend application & reconsider position stated in 880331 ltr.

DISTRIBUTION CODE: A001D      COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 3  
 TITLE: OR Submittal: General Distribution

NOTES: AEOD/Ornstein: 1cy.      05000269  
       AEOD/Ornstein: 1cy.      05000270  
       AEOD/Ornstein: 1cy.      05000287

|           | RECIPIENT<br>ID CODE/NAME | COPIES<br>LTTR ENCL | RECIPIENT<br>ID CODE/NAME  | COPIES<br>LTTR ENCL |
|-----------|---------------------------|---------------------|----------------------------|---------------------|
|           | PD2-3 LA                  | 1 0                 | PD2-3 PD                   | 5 5                 |
|           | PASTIS, H                 | 1 1                 |                            |                     |
| INTERNAL: | ACRS                      | 6 6                 | ARM/DAF/LFMB               | 1 0                 |
|           | NRR/DEST/ADS 7E           | 1 1                 | NRR/DEST/CEB 8H            | 1 1                 |
|           | NRR/DEST/ESB 8D           | 1 1                 | NRR/DEST/MTB 9H            | 1 1                 |
|           | NRR/DEST/RSB 8E           | 1 1                 | NRR/DOEA/TSB 11            | 1 1                 |
|           | NRR/PMAS/ILRB12           | 1 1                 | <del>NUDOCS-ABSTRACT</del> | 1 1                 |
|           | OGC 15-B-18               | 1 0                 | <u>REG FILE</u> 01         | 1 1                 |
|           | RES/DE/EIB                | 1 1                 |                            |                     |
| EXTERNAL: | LPDR                      | 1 1                 | NRC PDR                    | 1 1                 |
|           | NSIC                      | 1 1                 |                            |                     |
| NOTES:    |                           | 1 1                 |                            |                     |

TOTAL NUMBER OF COPIES REQUIRED: LTTR 29 ENCL 26

R  
I  
D  
S  
/  
A  
D  
D  
S

DUKE POWER COMPANY

P.O. BOX 33189  
CHARLOTTE, N.C. 28242

HAL B. TUCKER  
VICE PRESIDENT  
NUCLEAR PRODUCTION

TELEPHONE  
(704) 373-4531

April 22, 1988

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

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

Dear Sir:

By letter dated August 14, 1987 Duke Power Company (Duke) submitted a proposed amendment to the Oconee Facility Operating License and a revision to the Oconee Nuclear Station Technical Specifications. The proposed amendment would revise Technical Specification 3.4.4 to raise the minimum upper surge tank (UST) level from 5 feet to 6 feet. The proposed technical specification revision also included a revision to the table of emergency feedwater (EFW) flow demand in the bases of Technical Specification 3.4. Supporting technical discussions for the proposed changes were provided as part of a no significant hazards consideration evaluation pursuant to 10 CFR 50.91 and 10 CFR 50.92, Attachment 2 to Duke's letter of August 14, 1987.

In a letter dated March 31, 1988, responding to Duke's amendment request, the NRC stated:

"We have been reviewing your application (August 14, 1987), to revise the Oconee Technical Specifications (TSs) in two areas: 1) To raise the minimum upper surge tank level from five to six feet; and 2) To revise the table of emergency feedwater flow versus time (required to remove decay heat and reactor coolant pump heat following reactor trip from 102% rated power). We have started our review of these two issues and find that you have not provided any technical justification for these revisions to the TSs. We also note that for the second revision, you have not provided any type of determination for a no significant hazards consideration (SHC) pursuant 10 CFR 50.92. Also, the determination for the first revision is weak. Approval of the proposed revisions requires that you include the no SHC determination and technical justification. Accordingly, we find your request unsuitable for processing and we are unable to take further action regarding your request."

In response to your letter of March 31, 1988 Duke wishes to note the following:

- (1) The technical justification for revised Technical Specification 3.4.4 to require a minimum of 6 feet instead of 5 feet UST level is provided in the second paragraph of Attachment 2 to Duke's letter of August 14, 1987. As discussed in the August 14, 1987 letter, the change constitutes an additional limitation and a more stringent requirement compared to the present requirement for the UST level. The present

8805090205 880422  
PDR ADCK 05000269  
P DCD

1001  
11

requirement of 5 feet level in the UST is simply based only upon tank geometry and corresponds to a tank volume of 30,000 gallons. The proposed 6 feet UST level requirement takes into consideration the maximum expected UST level instrumentation error based on recent analyses performed by Duke Power Company. The uncertainty analyses to determine the adequacy of the UST level requirement showed that an indicated UST level of 6 feet is required to ensure that the Technical Specification 3.4.4 is satisfied. Therefore, the proposed 6 feet level setpoint includes an additional allowance for instrument error. This would assure a sufficient UST level for EFW suction and for the depletion of inventory while switching to an alternate EFW suction source.

- (2) A discussion of the technical justification for the changes in the table of EFW flow demand in the bases of Technical Specification 3.4 is provided in Attachment 2 to Duke's letter of August 14, 1987. As discussed in the August 14, 1987 letter, the changes in the table are based on revised calculations which assume a lower decay heat, a lower reactor coolant pump heat and inclusion of delay neutron power not originally assumed in calculations for EFW flow demand. The original calculations assumed infinite operation to determine decay heat level, while the revised calculations are based on a more realistic and bounding assumption of 440 effective full power days per cycle. The reactor coolant pump heat is based on actual heat input at hot conditions rather than the higher rated power of the pump. Furthermore, the introduction of the delay neutron power into the flow demand calculations results in higher flow demand for the two minute entry in the table. However, this change is conservatively based on the control rod worth associated with the minimum shutdown margin and does not affect the capability to achieve and maintain hot shutdown with only one EFW pump operating following loss of main FW with offsite power available. Finally, the table of EFW flow demand based on the revised calculations is bounding for any decay heat level that may occur in an Oconee core.
- (3) The revised table of EFW flow requirements is part of the bases for Technical Specification 3.4. This revised table has been submitted pursuant to 10 CFR 50, 50.36(a) and is not to be considered as part of the technical specifications. Specifically, 10 CFR 50, 50.36(a) states that "a summary statement of the bases or reasons for such specifications, other than those covering administrative controls, shall also be included in the application, but not become part of the technical specifications." Therefore, the requirements of 10 CFR 50.92 for determination of a no significant hazards consideration are not applicable for revisions to the table of EFW flow demand which is part of the bases of the Oconee Technical Specification 3.4. As such, Duke's amendment request of August 14, 1987 need only include the technical justification and determination of a no significant hazards consideration for the proposed change in Technical Specification 3.4.4. However, as mentioned earlier, Attachment 2 to Duke's letter of August 14, 1987 provides a discussion of the technical bases for changes to the table of EFW flow demand.

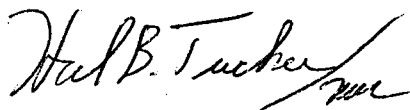
April 22, 1988

Page Three

In summary, Duke feels that the technical justification and determination of a no significant hazards consideration for the proposed Technical Specification 3.4.4 are of sufficient detail and meet the intent of 10 CFR 50.92. It should be noted that the change in the UST level requirement from 5 feet to 6 feet is clearly an improvement in the availability and reliability of the water sources for EFW for decay heat removal. This change provides an allowance based on simple uncertainty analysis for UST level instrument error and has been detailed in Duke's submittal to the extent applicable. Furthermore, table of EFW flow requirements in the bases of Technical Specification 3.4 is not considered as part of the technical specifications pursuant to 10 CFR 50.36(a). Therefore, the requirements of 10 CFR 50.92 are not applicable to changes in the table of EFW flow demand in the bases of Technical Specification 3.4.

Finally, based on the foregoing discussion, Duke respectfully requests that the NRC Staff review Duke's application of August 14, 1987 and reconsider their position as stated in the NRC letter of March 31, 1988.

Very truly yours,



Hal B. Tucker

MAH/1/sbn

Attachment

xc: Dr. J. Nelson Grace, Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

Mr. P. H. Skinner  
NRC Resident Inspector  
Oconee Nuclear Station

Mr. Heyward Shealy, Chief  
Bureau of Radiological Health  
South Carolina Department of Health &  
Environmental Control  
2600 Bull Street  
Columbia, South Carolina 29201

Ms. Helen Pastis  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555