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ACCESSION NBR: 9711170097 DOC.DATE: 97/11/05 NOTARIZED: NO DOCKET #
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SUBJECT: Provides status of license renewal activities which support renewed license application for Oconee. Identification & outline of five key topics which require NRC attention, discussed.

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November 5, 1997

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

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

Attention: J. W. Roe, Director (Acting),
Division of Reactor Program Management

When Duke Energy Corporation (Duke) initiated license renewal technical discussions with the NRC Staff early this year, our objective was to reach a general consensus with the staff regarding the level of detail to be contained in an application for a renewed operating license. We wanted to understand the appropriate level of detail in a license renewal submittal that would be sufficient to allow the staff to begin its technical review. Duke appreciates the staff's willingness to meet on several occasions this year to discuss electrical, mechanical, structural and environmental examples of license renewal information and the timely and constructive feedback provided by the staff in each of these areas. We believe that, as a result of the efforts of the staff over the past several months, our original objective has been met. The purpose of this letter is to provide the status of our license renewal activities in support of the preparation of a renewed license application for Oconee. We also identify and outline five key topics which we believe require NRC attention in the coming months in order to support the preparation of an Oconee license renewal application by Duke.

Duke plans to complete the required technical review activities and obtain station management approval to submit the complete Oconee License Renewal Technical Information Topical Report (OLRP-1001) in early 1998. The earliest submittal date of a complete Oconee renewed operating license application is July 1998. These dates are predicated on a number of factors and assumptions and are subject to change. In support of these dates, we continue to be involved in a number of industry activities that we believe will provide important support for the preparation of an Oconee application for a renewal operating license. Two of these activities are described below.

The first industry activity in which Duke is involved is the review of the working draft of the Standard Review Plan for License Renewal (SRP-LR) which was provided to Duke by NRC letter dated October 1, 1997. We recognize the significant amount of industry and staff efforts captured in this working draft SRP-LR. We plan to consider to the extent practical, the

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working draft of the SRP-LR as an aid in the development of the Oconee license renewal technical information submittal. We are also supporting an industry effort, under the auspices of the Nuclear Energy Institute, to review the SRP-LR and provide comments for staff consideration over the next several months.

The second industry activity in which Duke is involved is the review of the draft updated Environmental Standard Review Plan (SRP), including an Appendix specifically for license renewal applicants, which has been made available for comments (62 FR 51915 dated October 3, 1997). We plan to consider this draft document to the extent practical, as well as the draft Environmental Regulatory Guide, when available, as aids in the preparation of the Oconee environmental report that is required for license renewal. We will support industry efforts to provide comments on the draft Environmental SRP and the draft Environmental Regulatory Guide. A stable and predictable process to review environmental impacts associated with license renewal is very important to the preparation of an application for a renewed operating license.

The last several months have brought significant strides toward establishing a stable and predictable license renewal process. Beyond the progress made in these areas, we would like to highlight five key topics that we believe require NRC attention in order to effectively support the preparation of the technical and environmental information in an application for a renewed operating license for Oconee. These five key topics are described in the paragraphs that follow.

◆ Topic 1: Containment Information Review

During a January 6-7, 1997 meeting with the NRC Staff, we discussed the Containment sections of OLRP-1001. Positive feedback was provided by the staff during the meeting. Subsequently, by letter dated March 12, 1997, Duke submitted the Containment sections of OLRP-1001 for NRC Staff review and approval. We look forward to receiving the first round of staff requests for additional information on this submittal in the near future.

◆ Topic 2: Supporting Owners Group Information Review

As noted in our letter dated May 19, 1997 Duke is relying on several Owners Group technical reports in the preparation of the Reactor Coolant System sections of OLRP-1001. Duke appreciates the staff review conducted on the B&W Owners Group Pressurizer Report BAW-2244 and the issuance of the Safety Evaluation on BAW-2244 by NRC letter dated August 18, 1997. We encourage the staff to devote the resources necessary to complete the reviews of the other Owners Group documents that were listed in our May 19 letter in a timely manner. We would like the opportunity to review the draft safety evaluations for two B&W Owners Group reports (BAW-2251, covering the Reactor Vessel and BAW-2248 covering the Reactor Vessel Internals) that are currently NRC review prior to our submittal of OLRP-1001 in early 1998.

In addition, we respectfully request that the staff review of two other documents that were identified in our May letter be timely and not impact completion of the review of BAW-2251 (Demonstration of the Management of the Aging Effects of the Reactor Vessel) currently expected in 1998. These two documents are:

- ◇ BAW-2241P (Fluence and Uncertainty Methodologies) which was submitted by B&W Owners Group letter dated May 14, 1997; and
 - ◇ BAW-2301 (B&WOG Integrated Response to Generic Letter 97-01: "Degradation of Control Rod Drive Mechanism Nozzle and Other Vessel Closure Head Penetrations) which was submitted by B&W Owners Group letter dated July 25, 1997.
- ◆ Topic 3: Generic Issues and Broader Industry Concerns
- Duke is beginning to identify broader industry concerns where the development of a new inspection program or activity may be a long term effort and involve several industry organizations. One of these broader industry concerns is crack initiation and growth of small bore piping (less than 4-inches in diameter) in the reactor coolant system, which has been identified in the SRP-LR as an aging effect that must be addressed by license renewal applicants. This concern was discussed in a workshop meeting of the Special Working Group on Plant Life Extension (SWG PLEX-SC XI) in Kansas City on May 5, 1997 and is considered to be a generic concern that should be addressed in an industry-wide manner.

The development of an appropriate inspection program for reactor coolant system small bore piping (1) should involve industry organizations, including the American Society of Mechanical Engineers and the NRC and (2) may be a longer term effort that would not be completed in time to support the issuance of a plant specific renewed operating license. Duke believes that discussions on the development of a process to address these broader industry concerns as part of the application for a renewed operating license need to be conducted. A clear understanding of this process is very important to our development of OLRP-1001 and the preparation of the complete application for a renewed operating license for Oconee in 1998.

- ◆ Topic 4: Evaluation of Alternatives to License Renewal
- Based on an initial review of the draft Environmental SRP, we believe that additional clarification from the NRC is needed for near-term license renewal applicants in certain areas. For example, Duke has questions concerning the evaluation expectations with respect to reasonable alternatives as expressed in Chapter 9 of the draft Environmental SRP ('Alternatives to the Proposed Action') in light of ongoing restructuring and economic deregulation of the electric utility industry. Clarification of Commission expectations in this regard is important so that Duke can make its business decisions regarding the submittal of an application for a renewed operating license for Oconee in

1998. Duke plans to provide comments on this topic and other aspects of the draft Environmental SRP later.

◆ Topic 5: Environmental Impacts of Transportation

In June, the Commission directed the NRC Staff to complete its review of the environmental data related to the generic and cumulative environmental impacts of transportation of high level waste around a high-level waste repository. We look forward to the forthcoming Commission decision concerning relief from this review. Obtaining a timely Commission decision concerning this current regulatory requirement is very important in the preparation of an application for a renewed operating license by Duke in 1998.

As noted in above, our estimated schedule for submitting the technical information portion of an application (OLRP-1001) and the complete renewed license application for Oconee in 1998 is necessarily based on a number of assumptions. The above topics must be addressed in the near term in order to support the preparation of an application for a renewed operating license by Duke in 1998. The timely support of the NRC on these five topics would aid in our business decisions regarding Oconee license renewal. Addressing these topics in the near term means:

- (1) For Topic 1, achieving satisfactory progress in the NRC Staff review of the Oconee Containment submittal of March 1997;
- (2) For Topic 2, achieving satisfactory progress in the NRC Staff review of the Owners Group reports identified above;
- (3) For Topic 3, achieving satisfactory progress on the development of a process to address broader industry concerns as part of a renewed operating license application;
- (4) For Topic 4, obtaining clarification from the NRC for near-term license renewal applicants in the area of evaluating 'Alternatives to the Proposed Action' (Chapter 9 of the ER-SRP) in light of ongoing restructuring and economic deregulation of the electric utility industry; and
- (5) For Topic 5, obtaining a Commission decision on the specific review requirements for generic and cumulative environmental impacts of the high level waste transportation infrastructure for near-term license renewal applicants.

Duke appreciates the significant efforts of the NRC Staff this year in support of the many activities associated with making the license renewal process for nuclear power plants stable, predictable, and cost effective. As we make every effort to achieve the milestones set forth above, we look forward to the continued diligence by the NRC Staff on the above five priority topics in the coming months.

Very Truly Yours,

A handwritten signature in black ink, appearing to read 'W. R. McCollum Jr.', written in a cursive style.

W. R. McCollum Jr., Site Vice President
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