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December 8, 2000

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

Subject: Duke Energy Corporation
Oconee Nuclear Station, Units 1, 2, and 3
Docket Nos. 50-269, 50-270, and 50-287
Supplemental Information Regarding License Amendment Request for Technical Specification 5.5.10.e.6 and Topical Report BAW-2303P, Revision 4

- References:
- 1) Letter, Duke to USNRC, License Amendment Request for Technical Specification 5.5.10.e.6 and Topical Report BAW-2303P (TSCR 2000-07), Revision 4, dated September 12, 2000
 - 2) Letter, Duke to USNRC, Response to NRC Questions on License Amendment Request for Technical Specification 5.5.10.e.6 and Topical Report BAW-2303P, Revision 4, dated October 26, 2000
 - 3) Letter, Duke to USNRC, License Amendment Request for Technical Specification 5.5.10.e.6 and Topical Report BAW-2303P, Revision 4, dated November 10, 2000

Reference 1 submitted a Duke Energy Corporation (Duke) License Amendment Request (LAR) applicable to Oconee Technical Specification (TS) 5.5.10.e.6. This LAR proposed changes to the TS requirements for the Steam Generator (SG) Tube Surveillance Program, including revision of the referenced Topical Report. A request for NRC approval of this Topical Report, BAW-2303P, August 2000, *OTSG Repair Roll Qualification Report*, Revision 4, was also included in the September 12, 2000, LAR. Reference 2 provided responses to NRC questions.

By Reference 3, Duke agreed to accept certain License Conditions. During subsequent discussions between Duke and the NRC, these License Conditions were modified and new Conditions added. By this letter, Duke agrees to the following modified License Conditions that will be added to the Oconee Facility Operating Licenses Nos. DPR-38, DPR-47, and DPR-55 upon NRC issuance of the LAR contained in Reference 1.

A001

New Oconee License Condition:

In addition, until the steam generators are replaced, the license is amended to add the following License Condition:

- Steam Generator Circumferential Crack Report:

Following each inservice inspection of steam generator tubes, the NRC shall be notified of the following prior to returning the steam generators to service:

- a. Indication of circumferential cracking in the secondary side roll (lower roll in the upper tubesheet or upper roll in the lower tubesheet) if rerolled.
 - b. Indication of circumferential cracking in the original roll or heat affected zone adjacent to the tube-to-tubesheet seal weld if no reroll is present.
 - c. Determination of the best-estimate total leakage that would result from an analysis of the limiting Large Break Loss of Coolant Accident (LBLOCA) based on circumferential cracking in the original tube-to-tubesheet rolls, tube-to-tubesheet rerolls, and heat affected zones of seal welds as found during each inspection.
- Demonstrate that the primary-to-secondary leakage following a LBLOCA, as described in Appendix A to BAW-2374, is acceptable, based on the as-found condition of the SGs. This is required to demonstrate that adequate margin and defense-in-depth are maintained. For the purpose of this evaluation, acceptable means a best estimate of the leakage expected in the event of a LBLOCA that would not result in a significant increase of radionuclide release (e.g., in excess of 10 CFR 100 limits). A summary of this evaluation shall be provided to the NRC within 3 months following completion of steam generator tube inservice inspection with the report required by Technical Specification 5.6.8, Item b.

As a commitment, Duke will verify that the plant-specific EOPs are consistent with the descriptions in BAW-2374 in regard to the key operator actions for mitigation of the accident sequence of concern. These key operator actions are the transfer of the ECCS suction from the refueling water storage tank to the containment sump, and the isolation of the secondary system to minimize any primary-to-secondary leakage. Duke will also verify that the plant-specific EOPs are consistent with the B&WOG's November 27, 2000, letter with respect to compliance with 10 CFR 50.46.

Please contact Robert Douglas at 864-885-3073 with any questions regarding this submittal.

Very Truly Yours,


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

xc: (w/enclosures)

L.A. Reyes
Administrator, Region II

M. C. Shannon
NRC Senior Resident Inspector
Oconee Nuclear Station

D. E. LaBarge
ONRR, Senior Project Manager

V.R. Autry, Director
DHEC

AFFIDAVIT

W. R. McCollum, Jr., being duly sworn, states that he is Site Vice President of Duke Energy Corporation; that he is authorized on the part of said corporation to sign and file with the Nuclear Regulatory Commission this supplemental information regarding a proposed revision to the Oconee Nuclear Station License Nos. DPR-38, DPR-47, and DPR-55; and that all statements and matters set forth therein are true and correct to the best of his knowledge.



W. R. McCollum, Jr., Site Vice President

Subscribed and sworn to me: DECEMBER 8, 2000
Date

Notary Public: Robert C. Douglas

My Commission Expires: AUGUST 13, 2009
Date

Seal