DEC 15 1972

Docket Nos. 50-269
50-270
and 50-287

Duke Power Company
ATTN: Mr. A. C. Thies
Senior Vice President
Production and Transmission
422 South Church Street
P. O. Box 2178
Charlotte, North Carolina 28201

Gentlemen:

We have completed our preliminary review of your Amendment 37, Revision 24, to your application for operating licenses for Oconee Units 1, 2 and 3.

Enclosed are our comments and positions with regard to those revisions to the Technical Specifications.

If you have questions regarding the enclosed please contact us.

Sincerely,

Original Signed by
R. C. DeYoung

R. C. DeYoung, Assistant Director
for Pressurized Water Reactors
Directorate of Licensing

Enclosure:
As Stated

cc: William L. Porter, Esquire
Duke Power Company
P. O. Box 2178
422 South Church Street
Charlotte, North Carolina 28201

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Form AEC-318 (Rev. 9-53) AECM 0240

UNITED STATES
ATOMIC ENERGY COMMISSION
WASHINGTON, D.C. 20545

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OCONEE NUCLEAR STATION
TECHNICAL SPECIFICATIONS
(Thru Amendment 37, Revision 24)

Unit 1 Operations

Unit 1 Technical Specifications were found acceptable by our letter of August 28, 1972 with the provision that a number of changes (enclosed with the letter) were made. These changes were made by Amendments 34 and 35, Revisions 22 and 23 respectively, to your application. However, by Amendment 37, Revision 24, additional changes were made to the Unit 1 Technical Specifications not covered by the August 28, 1972 letters.

By this letter the Oconee Unit 1 Technical Specifications are acceptable through Revision 24 with the following exceptions.

1) Page iv - delete reference to Replacement pages for Units 1 and 2 and Units 1, 2 and 3 Technical Specifications.

2) Pages v and vi - delete reference to Spec. 4.16

3) Specification 3.3 - this specification is acceptable through Revision 23 only.

4) Specification 3.7 - this specification is acceptable through Revision 22 only.

Units 1 & 2 and Units 1, 2 and 3 Operations

The Technical Specifications for Units 1 & 2 operation will go into effect when Unit 2 becomes licensed for operation and the Technical Specifications for Unit 1 operations (discussed above) will become void. Since the Technical Specifications for Units 1 & 2 operations will apply to both units, they must be very clear in content regarding what applies on a per unit basis and what applies on a station basis. Duke should improve the Technical Specifications wherever necessary to avoid any confusion or ambiguity in their application. The above concern applies equally when Unit 3 becomes operational and the Units 1, 2 and 3 Technical Specifications go into effect and the Units 1 and 2 ones become void. The following comments concern substantial areas that need to be resolved.

1) Page v and vi - delete reference to Spec. 4.16

2) Specification 3.3 - the Revision 24 version of this specification does not conform to our discussion of the October 17, 1972 meeting at Bethesda. Therefore, we will require additional time for review. You will be notified if we require additional information in support of the changes.

3) Specification 3.5.2 - review of this specification is postponed until resolution of the fuel densification and ECCS issues now under review.

4) Specification 3.7 - the Revision 24 version of this specification does not conform to our discussion of the October 17, 1972 meeting at Bethesda. Therefore, we will require additional time for review. You will be notified if we require additional information in support of the changes.

5) Specification 3.9 - Objective d - change objective from 2×10^{-6} μc:/ml to 4×10^{-7} μc:/ml.

6) Specification 3.9.2 - delete the second sentence, beginning "Similarly . . . ," and add the following two sentences. "The concentration of tritium prior to release from the Restricted Area shall not exceed an average of 4×10^{-5} μc:/ml during any calendar quarter. The concentration of dissolved noble gases prior to release from the Restricted Area shall not exceed an average of 3×10^{-6} μc:/ml during any calendar quarter

7) Specification 3.9.3 - add a maximum instantaneous concentration for dissolved noble gases of 4×10^{-5} μc:/ml to this specification.

8) Specification 3.10 - Objective 1 - Change objective from $\leq$ 4340 m^3/sec to $\leq$ 5560 m^3/sec.

9) Specification 3.10.2 - in the first line change the word "and" to "in-"

10) Specification 3.10 Bases - 2nd paragraph beginning "The noble. . ." In the second line change the dispersion factor from 4.61×10^{-6} sec/m^3 to 3.6×10^{-6} sec/m^5.

11) Specification 4.11.1 - Add the sentence. "In addition to these samples, soil samples will be collected near the location of the terrestrial vegetation samples. Further, data will be included from two air particulate and air iodine samplers (near Warpath Recreation Area, and near boat dock at R. W. Gudger's Office) in the South Carolina State Board of Health Environmental Surveillance Program."

12) Specification 4.2.8 - this specification for Units 1 & 2 should be changed in accordance with the following program.

Actual Operation Time	Type of Capsule	Equivalent Exposure Time
1 year	B	1.8 years
11 years	A	19.8 years
17 years	A	30.6 years
22 years	A	39.6 years

This new program will effect Technical Specification 4.2.8 which will be changed to read as follows:

"A 'B' Type vessel specimen capsule shall be withdrawn after one year of operation. An 'A' Type capsule shall be withdrawn after 11, 17, and 22 years of operation. The withdrawal schedules may be modified to coincide with those refueling outages or unit shut-

downs most closely approaching the withdrawal schedule. Specimens thus withdrawn shall be tested in accordance with ASTM-E-185-70. A report of the test results shall be forwarded to the AEC within 90 days of withdrawal."

The second paragraph of the bases will be changed to read as follows:

"The reactor vessel specimen surveillance program is based on equivalent exposure times of 1.8, 19.8, 30.6 and 39.6 years. The contents of the different type capsules are defined below.

A Type	B Type
Weld Material	Haz Material
Haz Material	Base Line Material
Base Line Material	

This specification for Unit 3 should be changed to meet the intent of proposed Appendix H of 10 CFR 50.

13) Table 4.11.1 - add the following:

a) in Analysis for Aquatic Organisms add: "Sr-89, Sr-90 analysis on composite semiannually, if sufficient sample quantity is available for analysis."

b) in Analysis for Bottom Sediment add: "Sr-89, Sr-90 analysis semiannually "

c) in Analysis for Animals, Fish, and Milk add: "Gamma Analysis"

d) add the line:

"Type Samples	Schedule	Analysis "
Soil	Annually	Gamma Analysis

14) Specification 6.1.1.6.b - Add the words "per unit", after "and one Senior Reactor Operator."

15) Specification 6.1.1.6.e - add the words "for each unit" after "At least one operator per shift."

16) Specification 6.1.1.6.f - add a new item as follows:

f. "If the computer for a reactor is inoperable for more than eight (8) hours, an additional operator will be called in to supplement the shift crew."

17) Table 6.1-1 - add "RO" in the Minimum Qualification column for the Assistant Control Operator. Submit a revised Table 6.1-1 for 3-unit operation that meets the minimum shift complement specified in the 8/15/72 letter, i.e.: "For three-unit operation, we have concluded that the minimum shift complement shall be eleven. This crew is composed of three licensed Senior Reactor Operators, four persons with Reactor Operator Licenses, and four unlicensed operators.