



Duke Energy

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

March 18, 2002

Mr. Samuel J. Collins
Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Oconee Nuclear Station
DPR-38, DPR-47, DPR-55
50-269, 50-270, 50-287

**RE: Request for Extension of Time to Submit an Answer and
Request a Hearing**

Dear Mr. Collins:

Section IV of the Nuclear Regulatory Commission's ("NRC") February 25, 2002 Order Modifying Licenses ("Order") states that, in accordance with 10 C.F.R. § 2.202, a Licensee must submit an answer to the Order and may request an extension of time in which to submit an answer or to request a hearing on the Order within 20 days of the date of the Order. In addition, the Order states, "[w]here good cause is shown, consideration will be given to extending the time to request a hearing."

For the following reasons, Oconee Nuclear Station hereby requests an extension of time to supplement the Answer to the Order submitted March 18, 2002 and to request a hearing.

As required by Condition C.1. of the Order, Oconee Nuclear Station's response identifies actions that have been or will be taken to comply with each applicable requirement and provides a proposed schedule for implementation. We have responded to Condition B.1. (2) by identifying requirements with which compliance is unnecessary in Oconee Nuclear Station's specific circumstances. With regard to Condition B.1. (1) and (3), Oconee Nuclear Station has not identified any requirements with which Oconee Nuclear Station is unable to comply or for which compliance would cause Oconee Nuclear Station to be in violation of a Commission regulation or facility license. With regard to Condition B. 2, Oconee Nuclear Station has not identified any requirement the implementation of which would adversely impact safe operation of the facility.

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In a few instances, as detailed in the March 18, 2002 submittal from W. R. McCollum, Jr. to the NRC, we are unable to complete the necessary evaluations to determine what actions are appropriate and what an appropriate schedule for implementation would be within the required response time. As a result, pursuant to Section IV of the Order, Oconee Nuclear Station requests (1) an extension of time to file an answer for Interim Compensatory Measures B2.a(1) and B2.a(2) until the date identified in our March 18 submittal for completing the analyses and or other actions with respect to those Interim Compensatory Measures, and (2) a comparable extension of time to file a request for hearing with respect to those matters.

Good cause exists for this request. Several complex analyses are being performed related to these measures. Until these analyses required to respond to the Order are complete, Oconee Nuclear Station cannot know if it is able to comply with the Order in these respects, if compliance is necessary in the circumstances, or if compliance would cause Oconee Nuclear Station to be in violation of NRC regulations or a facility license. Accordingly, Oconee Nuclear Station cannot know at this time how its interests will be affected by the Order and cannot determine at this time whether a request for a hearing would be appropriate. Thus, as noted above, Oconee Nuclear Station requests an extension of time to file an answer to certain Interim Compensatory Measures, and similarly requests an extension of time for requesting a hearing on that portion of the Order that relates to these certain Interim Compensatory Measures.

Sincerely,

Duke Energy Corporation



William R. McCollum, Jr.
Site Vice President

Office of Nuclear Reactor Regulation
March 18, 2002

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