

November 21, 2002

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

Subject: Oconee Nuclear Station, Units 1, 2, and 3
Docket Numbers 50-269, 50-270, and 50-287
License Amendment Request to Extend the Completion Time for an
Inoperable Low Pressure Injection Train from 72 hours to 7 days -
Revised No Significant Hazards Consideration
Technical Specification Change Number 2001-005

Pursuant to a November 18, 2002 telephone call between Mr. Lenny Olshan of the Nuclear Regulatory Commission and Mr. Stephen Newman of Duke Energy Corporation (Duke), Duke is replacing in its entirety, the responses to the No Significant Hazards Consideration submitted with the original October 24, 2002 license amendment change request with the revised responses given in the Attachment to this letter. The purpose of this change is to incorporate the No Significant Hazards Consideration guidance information found in Technical Specification Task Force Change Traveler (TSTF) 430, "AOT Extension to 7 days for LPI and Containment Spray (BAW-2295-A, Rev. 1)."

Inquiries on this amendment request change should be directed to Stephen C. Newman of the Oconee Regulatory Compliance Group at (864) 885-4388.

Very truly yours,



R. A. Jones, Vice President
Oconee Nuclear Site

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Mr. Virgil R. Autry, Director
Division of Radioactive Waste Management
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Department of Health & Environmental Control
2600 Bull Street
Columbia, SC 29201

R. A. Jones, being duly sworn, states that he is Vice President, Oconee Nuclear Site, Duke Energy Corporation, that he is authorized on the part of said Company to sign and file with the U. S. Nuclear Regulatory Commission this revision to the Facility Operating License Nos. DPR-38, DPR-47, and DPR-55, for Oconee Units 1, 2, and 3 respectively, and that all the statements and matters set forth herein including those from the original license amendment request are true and correct to the best of his knowledge.



R. A. Jones, Vice President
Oconee Nuclear Site

Subscribed and sworn to before me this 21 day of November, 2002


Notary Public

My Commission Expires:
My Commission Expires Aug. 19, 2009

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ATTACHMENT

NO SIGNIFICANT HAZARDS CONSIDERATION (Revised)

Pursuant to 10 CFR 50.91, Duke Energy Corporation (Duke) has made the determination that this amendment request involves a No Significant Hazards Consideration by applying the standards established by the NRC regulations in 10 CFR 50.92. The specific responses to the criterion are discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change allows for one train of Low Pressure Injection to be inoperable for up to 7 days. The Low Pressure Injection system is not an initiator for any accident previously evaluated and the consequences of an event during the extended Completion Time are no more severe than the consequences of the same event during the current Completion Time. Therefore, the consequences of an event previously analyzed are not increased. Consequently, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change allows for one train of Low Pressure Injection to be inoperable for up to 7 days. The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed change involve a significant reduction in the margin of safety?

Response: No.

The proposed change allows for one train of Low Pressure Injection to be inoperable for up to 7 days. An evaluation presented in Topical Report BAW-2295 and accepted by the NRC concluded that the extended Completion Time did not result in a significant reduction in the margin of safety. Therefore, the proposed change does not involve a significant reduction in the margin of safety.