

July 1, 2003

U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Document Control Desk

Subject: Oconee Nuclear Station  
Docket Numbers 50-269, 270, and 287  
Additional Information Concerning License Amendment  
Request for Low Temperature Overpressure Protection  
System 3.4.12, Surveillance Requirement 3.4.12.5  
Technical Specification Change (TSC) Number  
2002-09

On April 10, 2003, Duke Energy Corporation (Duke) submitted a request to revise Technical Specification (TS) 3.4.12, Surveillance Requirement (SR) 3.4.12.5. As a result of conversations between Duke and Nuclear Regulatory Commission (NRC) personnel, the following information is provided to clarify the requirements associated with the proposed change to SR 3.4.12.5.

Currently, SR 3.4.12.5 is required to be performed within 12 hours after decreasing Reactor Coolant System (RCS) temperature to  $\leq 325^{\circ}\text{F}$  and every 31 days thereafter. This frequency does not require the first performance of the SR until within 12 hours after entry into the mode of applicability. Following this first performance, the SR is required to be performed on a 31 day frequency.

The proposed frequency for SR 3.4.12.5 is 31 days, without the caveat of being able to delay performance until 12 hours after entering the mode of applicability. As stated in both Oconee TS and NUREG-1430, Volume 1, Revision 2, Section 1.4, Example 1.4.1, if the interval as specified is exceeded while the unit is not in a mode or other specified condition in the Applicability of the Limiting Condition for Operation for which performance of the SR is required, the surveillance must be performed within the frequency requirements prior to entry into the mode or other specified condition.

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Consequently, specifying a frequency of 31 days will require that this SR be met prior to entry into the mode of applicability. As current TS allow a 12 hour delay in performance of the SR, this requested change is conservative in that it will require that the SR be met prior to entering into the mode of applicability.

If there are any additional questions, please contact Noel Clarkson at (864) 885-3077.

Very truly yours,

A handwritten signature in black ink, appearing to be 'R. A. Jones', written over the typed name.

R. A. Jones, Vice President  
Oconee Nuclear Site

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