

June 17, 2004

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

Attention: Document Control Desk

Subject: Oconee Nuclear Station
Docket Numbers 50-269, 270, and 287
Supplement 6 to the License Amendment Request for
Temporary Extension to the Completion Times for
One and Two Keowee Hydro Units Inoperable
Technical Specification Change (TSC) Number
2002-05

In a submittal dated August 22, 2002, and supplemented by letters dated September 12, 2003, and February 4, February 16, March 23, and April 28, 2004, Duke proposed to amend Appendix A, Technical Specifications, for Facility Operating Licenses DPR-38, DPR-47 and DPR-55 for Oconee Nuclear Station, Units 1, 2, and 3. The amendment would temporarily extend Technical Specification (TS) 3.8.1 Required Action Completion Times when in the Conditions for one or two Keowee Hydro Units (KHU) inoperable to allow significant maintenance and upgrades to be performed.

In the April 28, 2004, Supplement, Duke indicated that weather and grid related entry and exit criteria were being developed for the dual KHU outages and would be included in the Critical Evolution Plan for the Keowee Outages. During a conference call on May 25, 2004, Duke provided the entry and exit criteria that had been developed to date. The NRC requested Duke to docket the entry and exit criteria. Attachment 1 provides the requested information. Attachment 2 provides a summary of the Regulatory Commitments made in the August 22, 2002 License Amendment Request (LAR) and the subsequent LAR Supplements.

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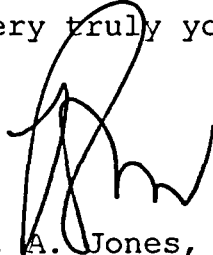
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If there are any questions regarding this submittal, please contact Boyd Shingleton at (864) 885-4716.

Very truly yours,

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

R. A. Jones, Vice President
Oconee Nuclear Site

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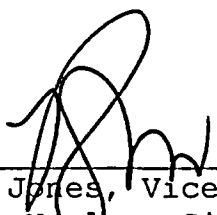
cc: Mr. L. N. Olshan, Project Manager
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Mr. W. D. Travers, Regional Administrator
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Mr. M. C. Shannon
Senior Resident Inspector
Oconee Nuclear Station

Mr. Henry Porter, Director
Division of Radioactive Waste Management
Bureau of Land and Waste Management
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 Renewed Facility Operating License Nos. DPR-38, DPR-47, DPR-55; and that all the statements and matters set forth herein are true and correct to the best of his knowledge.



R. A. Jones, Vice President
Oconee Nuclear Site

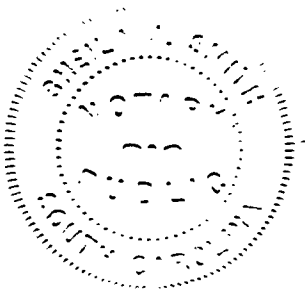
Subscribed and sworn to before me this 17th day of June, 2004



Notary Public

My Commission Expires:

6/12/2013



Attachment 1

Response to Request for Additional Information

During a conference call on May 25, 2004, NRC requested Duke to docket the grid and weather related entry and exit criteria for the dual Keowee Hydro Unit (KHU) outages. The Critical Evolution Plans for the dual KHU outages include the criteria identified below.

Criteria for entering dual KHU outage

Within two hours of the start of a dual KHU outage, Duke will verify:

- 1) System electrical grid status is Yellow or Green and is expected to remain so for the next three days.
- 2) Electrical system reserves are Adequate, Good, or Excellent and are expected to remain so for the next three days.
- 3) There are a minimum of 4 independent power paths (offsite power lines) into the ONS switchyard.
- 4) There are no tornado watches or warnings and none forecasted for the Oconee/Pickens county area for the next three days.
- 5) There are no tropical storms or hurricanes forecasted to affect the Oconee/Pickens county area for the next three days.
- 6) There are no ice storms or conditions that could produce ice storms forecasted for the Oconee/Pickens county area for the next three days that could produce a radial ice accumulation of ½ inch on power lines.

Criteria for requiring an immediate evaluation of the need to exit dual KHU outage

- 1) System electrical grid status is expected to change to Orange or Red prior to the end of the outage.
- 2) Electrical system reserves are expected to degrade below Adequate prior to the end of the outage.
- 3) Less than 4 offsite lines are available.

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- 4) A tropical storm, hurricane, or frontal system that could produce damaging winds or tornados is forecasted to affect the Oconee/Pickens county area prior to the end of the outage.
- 5) An ice storm that could produce ¼ inch of radial ice accumulation on power lines with 30 mph winds or ½ inch of radial ice on power lines with no winds is forecasted for the Oconee/Pickens county area prior to the end of the outage.

Immediate Evaluation process:

The Critical Evolution Coordinator assesses the condition and determines whether it merits exiting the dual KHU outage. This assessment will include at a minimum an evaluation of how bad/imminent the threat is, how long it would take to restore a KHU (dependent upon where we are at in the outage, 6 to 12 hours), how soon the problem will impact the Oconee Site, whether the problem will reoccur, and whether the problem will pass before a KHU could be restored. The Critical Evolution Coordinator will advise the Operations Shift Manager (OSM) immediately to determine the appropriate action.

If Conditions require an immediate decision, the OSM shall decide whether to recover one KHU immediately or to continue with the dual KHU outage. If time permits the OSM may chose to convene a Plant Operations Review Committee (PORC) and present the recommended course of action for PORC review and approval.

List of Regulatory Commitments

The following table identifies those actions committed to by Duke Energy Corporation (Duke) in this letter, the initial August 22, 2002 License Amendment Request (LAR), and subsequent Supplements (September 12, 2003, February 4, February 16, March 23, and April 28, 2004). Any other statements in these submittals were provided for informational purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Boyd Shingleton at (864) 885-4716.

REGULATORY COMMITMENTS	Due Date/Event
Keowee Refurbishment Work will be controlled by a Critical Evolution Plan (CEP)	Keowee Refurbishment Outages
The compensatory measures committed to by the License Amendment Request (LAR) and its Supplements will be captured in the CEP for each Keowee Refurbishment Outage	Keowee Refurbishment Outages
The Lee Combustion Turbines (LCTs) not energizing the standby buses will be on standby should the required LCT become inoperable	Keowee Refurbishment Outages
A LCT will be aligned to energize the standby bus before the emergency power paths are removed from service	Keowee Refurbishment Outages
During periods when both KHUs are inoperable, one of the two standby LCTs will be running.	Keowee Refurbishment Outages
No discretionary maintenance or testing will be performed on the Standby Shutdown Facility, Emergency Feedwater System, and AC Power System	Keowee Refurbishment Outages
Work on the 230 kV switchyard and transformer yards, and other ORAM-sentinel risk significant systems associated with AC power availability will be restricted during the single and dual KHU outages.	Keowee Refurbishment Outages
To the extent practical, maintenance and testing in the switchyard is to be scheduled outside the time period of the upgrade.	Keowee Refurbishment Outages
Any maintenance on the Duke system that could affect the Oconee switchyard is being re-scheduled outside the Keowee outage time frame.	Keowee Refurbishment Outages
The 30 mile Lee Electrical Transmission Right of Way line segment will receive danger tree maintenance work for trees located outside the defined R/W width.	Keowee Refurbishment Outages
The CEP will include criteria related to weather and grid conditions that must be satisfied prior to the start of the overall Keowee Refurbishment Outage and each of the dual KHU outages	Keowee Refurbishment Outages
The criteria will include a check of the short range weather forecast and grid conditions	Keowee Refurbishment Outages
The CEP will also specifically address the need to monitor weather and grid conditions and include appropriate actions based on those conditions and the status of the Keowee units.	Keowee Refurbishment Outages
The CEP will include steps to verify the RTCA computer program is available prior to the start of a dual KHU outage.	Keowee Refurbishment Outages
The CEP will include criteria to determine weather or grid conditions that would require returning a Keowee unit to service.	Keowee Refurbishment Outages
Duke will have provisions in place to return a KHU to service should termination criteria in the CEP be met.	Keowee Refurbishment Outages
Duke will have provisions in place to allow the return of one KHU to service should Keowee be without auxiliary power as a result of a loss of power	Keowee Refurbishment Outages
The SSF Pressurizer Heater Capacity modification will be completed prior to the KHU Refurbishment Outages	Complete

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REGULATORY COMMITMENTS	Due Date/Event
Duke will verify the system electrical grid status is Yellow or Green and is expected to remain so for the next three days within 2 hours of the start of a dual KHU outage.	Keowee Refurbishment Outages
Duke will verify the electrical system reserves are Adequate, Good, or Excellent and are expected to remain so for the next three days within 2 hours of the start of a dual KHU outage.	Keowee Refurbishment Outages
Duke will verify there are a minimum of 4 independent power paths (offsite power lines) into the ONS switchyard within 2 hours of the start of a dual KHU outage.	Keowee Refurbishment Outages
Duke will verify there are no tornado watches or warnings in the Oconee/Pickens county area and none are forecast for the next three days within 2 hours of the start of a dual KHU outage.	Keowee Refurbishment Outages
Duke will verify there are no tropical storms or hurricanes forecasted to affect the Oconee/Pickens county area for the next three days within 2 hours of the start of a dual KHU outage.	Keowee Refurbishment Outages
Duke will verify there are no ice storms or conditions that could produce ice storms in the Oconee/Pickens county area forecasted for the next three days that could produce a radial ice accumulation of ½ inch on power lines within 2 hours of the start of a dual KHU outage.	Keowee Refurbishment Outages
Duke will immediately evaluate the need to exit a dual KHU outage if the system electrical status is expected to change to Orange or Red, the electrical system reserves are expected to degrade below Adequate, or less than 4 offsite lines are available prior to the end of the outage.	Keowee Refurbishment Outages
Duke will immediately evaluate the need to exit a dual KHU outage if a tropical storm, hurricane, or frontal system that could produce damaging winds or tornados is forecasted for the Oconee/Pickens county area prior to the end of the outage.	Keowee Refurbishment Outages
Duke will immediately evaluate the need to exit a dual KHU outage if an ice storm that could produce ¼ inch of radial ice accumulation on conductors with 30 mph winds or ½ inch of radial ice accumulation with no winds is forecasted for the Oconee/Pickens county area prior to the end of the outage.	Keowee Refurbishment Outages