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September 29, 2005

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

Subject: Oconee Nuclear Station  
Docket Nos. 50-269, -270, and -287  
Withdrawal of License Amendment Request for  
Reactor Building Auxiliary Cooler Isolation  
Circuitry, Technical Specification 3.3.29  
Technical Specification Change (TSC) Number  
2003-06

On August 26, 2004, Duke Energy Corporation (Duke) submitted a License Amendment Request (LAR) regarding an addition to the Technical Specifications (TS) for new TS 3.3.29, Reactor Building Auxiliary Cooler (RBAC) Isolation Circuitry. This circuitry isolates non-safety portions of the Low Pressure Service Water (LPSW) system piping inside containment that supply the RBACs to eliminate potentially damaging waterhammers. This modification is one of several being implemented in support of resolving GL 96-06 issues.

During modification design and scoping, Duke adopted the conservative position that this circuitry aids in the mitigation of a loss of offsite power (LOOP) event, thereby meeting the definition of 'primary success path' as defined by criterion 3 of 10 CFR 50.36.

Criterion 3 of 10 CFR 50.36 is defined as follows: A structure, system, or component (SSC) that is part of the primary success path and which functions or actuates to mitigate a Design Basis Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

The primary success path for LOOP mitigation is the Emergency Power System as defined in UFSAR Chapter 15. The RBAC Isolation circuitry provides waterhammer prevention mitigation. Waterhammer events are not DBA discussed in UFSAR Chapter 6 or 15. Therefore, the circuitry does not

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U. S. Nuclear Regulatory Commission

September 29, 2005

Page 2

meet criterion 3 of 10CFR50.36 as defined above. As a result, Duke requests that TSC 2003-06 be withdrawn.

Please address any questions to B. G. Davenport at (864) 885-3044.

Very Truly Yours,

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

R. A. Jones  
Site Vice President  
Oconee Nuclear Station

U. S. Nuclear Regulatory Commission  
September 29, 2005  
Page 3

xc:

W. D. Travers  
U. S. Nuclear Regulatory Commission  
Regional Administrator, Region II  
Atlanta Federal Center  
61 Forsyth St., SW, Suite 23T85  
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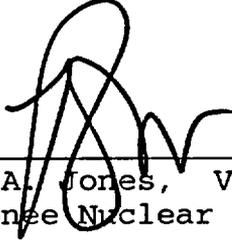
L. N. Olshan, NRC Project Manager (ONS)  
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S. Peters, NRC Project Manager  
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M. C. Shannon  
Senior Resident Inspector (ONS)  
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H. Porter, Director  
Division of Radioactive Waste Management  
Bureau of Land & Waste Management  
Department of Health & Environmental Control  
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Columbia, SC 29201

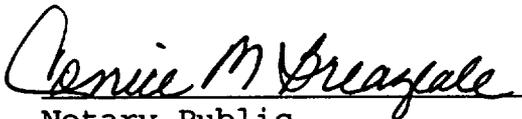
R. A. Jones, being duly sworn, states that he is Vice President, Oconee Nuclear Site, Duke Energy Corporation, that he is authorized on the part of said Company to sign and file with the U. S. Nuclear Regulatory Commission this revision to the Facility Operating License Nos. DPR-38, DPR-47, DPR-55; and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



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R. A. Jones, Vice President  
Oconee Nuclear Site

Subscribed and sworn to before me this 29 day of  
September, 2005



Notary Public

My Commission Expires:

12/19/12