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November 27, 2006

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

SUBJECT: Duke Power Company
Oconee Nuclear Station
Units 1, 2, and 3
Docket Nos. 50-269, 50-270, 50-287
Inservice Testing (IST) Program
Fourth 10 Year Program Interval
Use of Subsequent Code Edition

By letter dated June 10, 2002, Oconee Nuclear Station (Oconee) submitted its Fourth 10 Year Interval IST Program to the NRC.

At this time, Oconee desires to revise that program to use Mandatory Appendix I, *Inservice Testing of Pressure Relief Devices in Light-Water Reactor Nuclear Power Plants*, of the ASME OMB 2000 Code for testing of Pressure Relief Devices. Pursuant to 10 CFR 50.55a(f)(4)(iv), Oconee hereby requests NRC approval of the use of Appendix I of the ASME OMB 2000 Code for the remainder of the fourth ten-year interval of the IST program. In accordance with Regulatory Issue Summary 2004-12, this request to use a later edition and addenda is not a relief request; it is simply a request to use a later Code. The details of the 10 CFR 50.55a request are enclosed.

Due to the impact of this change on outage planning for our Unit 2 EOC 22 outage in Spring 2007, approval is requested prior to April 1, 2007.

If you have any questions or require additional information, please contact Randy Todd at (864) 885-3418.

Sincerely,


Bruce H. Hamilton

Enclosure: 10 CFR 50.55a Request Number ONS-PRD

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 Document Control

10 CFR 50.55a Request Number ONS-PRD

**Request in Accordance with
10 CFR 50.55a(f)(4)(iv)**

-- Use of subsequent ASME Code Edition and Addenda --

1. ASME Code Component(s) Affected

All pressure relief devices in the scope of the OM Code, Section IST.

2. Applicable Code Edition and Addenda

ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code) 1995 Edition, 1996 OMa Addenda.

3. Proposed Subsequent Code Edition and Addenda

The 1998 edition through 2000 OMb addenda of Mandatory Appendix I, Inservice Testing of Pressure Relief Devices in Light-Water Reactor Nuclear Power Plants as referenced by ASME OM Code. The proposed Code Edition and Addenda of Mandatory Appendix I section of the Code will be applied in its entirety for all pressure relief devices in the scope of the Code. Other portions of IST program will continue to apply the 1995 Edition, 1996 OMa Addenda of the OM Code. The 1998 Edition through 2000 OMb Addenda of the ASME OM Code was incorporated by reference into 10 CFR 50.55a(b) on September 26, 2002 (67 FR 60520), and became effective on October 28, 2002, with no modifications or limitations placed on ASME OM Code or Mandatory Appendix I requirements involving pressure relief valve testing.

4. Related Requirements

There are no modifications or limitations listed in 10 CFR 50.55a(b) that apply to Mandatory Appendix I components in this subsequent Code Edition and Addenda. There are no applicable related requirements in the 2000 OMb Code other than Appendix I.

5. Duration of Proposed Request

Due to the impact of this change on outage planning for our Unit 2 EOC 22 outage in Spring 2007, approval is requested prior to April 1, 2007. The duration of the request is for the remainder of the fourth ten-year program interval, which began June 1, 2002.

6. Precedents

This request is similar to a request submitted by Detroit Edison for Fermi-2 (Letter dated April 15, 2005, ML051230174) and approved by the NRC (Letter dated July 25, 2005, ML051710089).