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*See Revised
Change To
Tech
Specs*

SUBJECT: Application for amends to licenses DPR-38, DPR-47 & DPR-55, revising pressure-temp limits for current TSs 3.1.2. Grace period of 90 days for implementation & exemption from certain requirements of 10CFR50.60 is also being requested.

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W. R. McCollum, Jr.
Vice President

October 15, 1998

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Proposed Revision to Technical Specifications
Pressure-Temperature Operating Curves
Technical Specification Change No. 98-06

Reference: Letter, WR McCollum (Duke) to USNRC-DCD,
Request for Additional Information Concerning
Generic Letter 92-01, Revision 1,
Supplement 1, June 25, 1998

Pursuant to 10 CFR 50.90, Duke Energy Corporation (Duke) hereby requests an amendment to the Technical Specifications for Oconee Nuclear Station. This proposed amendment revises the pressure-temperature limits of current Technical Specifications 3.1.2 for Units 1, 2, and 3. The proposed amendment will revise the heatup, cooldown, and inservice test limitations for the reactor coolant system of each unit to a maximum of 26 Effective Full Power Years (EFPY) for all three units. Further, the proposed amendment revises current Technical Specification 3.1.2.9, Low Temperature Overpressure Protection, to reflect the revised pressure-temperature limits of the reactor vessels. For the reasons discussed below, it is requested that these changes be approved in both the Improved Technical Specification and the Current Technical Specification format.

Currently, Oconee Unit 1, 2, and 3 pressure-temperature limits have been evaluated for up to 21, 19, and 21 EFPY, respectively. Since the Unit 2 pressure-temperature limits are only effective until 19 EFPY, Unit 2 is the most limiting unit. Duke has applied the ratio procedure of Regulatory Guide 1.99, Revision 2, Position 2.1, as specified in the referenced letter regarding remaining Generic Letter 92-01, Revision 1, Supplement 1 issues, to

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the current pressure-temperature limit curves and in calculating the new pressure-temperature limit curves described in this amendment request. Application of the ratio procedure methodology reduces the validity of the current Unit 2 curves to approximately 18.6 EFPY. As of August 1, 1998, Oconee Units 1, 2, and 3 were at 18.18, 17.92, and 17.72 EFPY, respectively. Unit 2 is projected to reach 18.6 EFPY in April 1999.

The referenced letter indicated that Duke planned, by September 30, 1998, to respond to the remaining Generic Letter 92-01, Revision 1, Supplement 1, issue by submittal of revised pressure-temperature and low temperature overpressure limits. Although Duke's response was delayed beyond the planned submittal date of September 30, 1998, to allow completion of technical analyses, the attached submittal provides the requested additional information.

Due to the complexities involved with implementation of this proposed amendment, Duke requests a 90 day grace period for implementation instead of the standard 30 day grace period. As a result, Duke requests approval of this proposed amendment by January 29, 1999, to support continued operation of Unit 2.

The proposed amendment also includes an exemption request pursuant to 10CFR50.12 from certain requirements of 10CFR50.60. This exemption request will allow an alternate methodology, per Code Case N-514, to determine the low temperature overpressure protection (LTOP) setpoints for the Oconee units. The content of the Code Case has been incorporated and published in the 1993 Addenda to Appendix G of ASME Section XI. The NRC has previously approved the use of Code Case N-514 for Arkansas One Unit 1 and Crystal River 3.

The proposed amendment for conversion of the current Oconee Technical Specification (CTS) to the Oconee Improved Technical Specifications (ITS) was submitted to the NRC by Duke's letter dated October 28, 1997. Duke currently plans to implement the conversion between January 1999 and March 1999. Due to uncertainties in the timing of approval and implementation of the ITS, approval of the changes proposed in this request is requested in both the CTS and ITS formats. Duke will implement the change in the applicable format. Therefore, as described below, this amendment

application provides the affected pages in both the ITS and CTS versions.

Attachments 1a and 1b provide the proposed new ITS pages and the markup pages for the ITS, respectively. Attachments 2a and 2b provide the proposed new CTS pages and the markup pages for the CTS, respectively. The markup pages identify the added and deleted portions. Attachment 3 and the Bases of the Technical Specifications provide the supporting technical justification. Attachments 4 and 5 contain the No Significant Hazards Consideration Evaluation and the Environmental Impact Analysis, respectively.

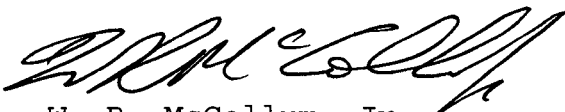
Implementation of this amendment to the Oconee Technical Specifications will impact the Oconee UFSAR. Necessary changes will be made in accordance with 10 CFR 50.71(e).

The Nuclear Safety Review Board and the ONS Plant Operations Review Committee have reviewed and approved this proposed Technical Specification amendment.

A copy of this application is being forwarded to the South Carolina Department of Health and Environmental Control for their review and, as appropriate, subsequent consultation with the staff.

If there are any questions regarding this submittal, please contact Robert Douglas at 864-885-3073.

Very truly yours,



W. R. McCollum, Jr.
Oconee Site Vice President

Attachments (5)

U. S. NRC Document Control Desk
October 15, 1998

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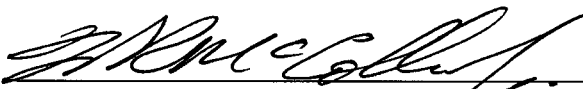
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Mr. D. E. Labarge
ONRR, Project Manager

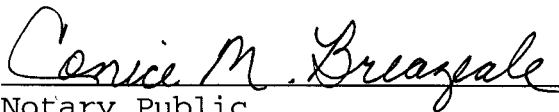
Mr. V. R. Autry
DHEC

W. R. McCollum, Jr., 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 Oconee Nuclear Station License Nos. DPR-38, DPR-47, DPR-55; and that all statements and matters set forth therein are true and correct to the best of his knowledge.



W. R. McCollum, Jr., Vice President
Oconee Nuclear Site

Subscribed and sworn to me this 15th day of October, 1998.



Notary Public

My Commission expires:

2-12-2002