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*See Proposed Change  
To Tech Specs*

SUBJECT: TS Change 98-13 to Licenses DPR-38, DPR-47 & DPR-55,  
respectively, correcting previously identified deficiencies  
in Tech Specs re to HPIS.EOP encl also.

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W. R. McCollum, Jr.  
Vice President

December 16, 1998

U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
ATTENTION: Document Control Desk

SUBJECT: Duke Energy Corporation  
Docket No(s). 50-269, -270, -287  
Oconee Nuclear Station Units 1, 2, and 3  
Proposed Amendment to the Facility Operating  
License Regarding the High Pressure Injection  
System Requirements  
Technical Specification Change # 98-13

Pursuant to 10 CFR 50.90, this letter submits a proposed license amendment for Facility Operating License Nos. DPR-38, DPR-47, and DPR-55 for Oconee Nuclear Station Units 1, 2, and 3, respectively. The proposed license amendment request (LAR) corrects previously identified deficiencies in the Technical Specifications related to the High Pressure Injection (HPI) system.

Previously, Duke submitted a proposed license amendment on March 31, 1997, to resolve deficiencies associated with the Technical Specifications related to the HPI System. Duke withdrew the license amendment request and its supporting information on November 4, 1998, because a substantial revision was required to:

- 1) resolve questions raised by the Nuclear Regulatory Commission (NRC) in a request for additional information (RAI) dated July 16, 1998 and
- 2) satisfy an NRC recommendation to utilize a risk-informed justification in accordance with Regulatory Guides 1.174, "An Approach for Using Probabilistic Risk Assessment In Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," and 1.177, "An Approach for Plant-

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Specific Risk-Informed Decisionmaking: Technical Specifications."

This submittal provides the revised LAR which stands alone. It contains the following attachments:

Attachment 1 provides the instructions for updating the Technical Specifications.

Attachment 2 provides the proposed Technical Specifications and Bases.

Attachment 3 provides a mark-up of the Oconee Improved Technical Specifications.

Attachment 4 provides a discussion of the proposed changes to the Technical Specifications and Bases. It includes enclosures discussing the small break loss of coolant accident (SBLOCA) analyses, the atmospheric dump valve (ADV) flow paths, the operator actions credited in the SBLOCA, and long term cooling.

Attachment 5 documents the determination that the amendment contains No Significant Hazards Considerations pursuant to 10 CFR 50.92.

Attachment 6 provides the basis for the categorical exclusion from performing an Environmental Assessment/Impact Statement pursuant to 10 CFR 51.22(c)(9).

Attachment 7 provides the risk-informed analysis performed in accordance with Regulatory Guides 1.174 and 1.177.

Implementation of this amendment to the Oconee Facility Operating License and Technical Specifications will impact the Oconee Updated Final Safety Analysis Report. Necessary changes will be made in accordance with 10CFR50.71(e).

Duke is requesting an implementation period of 75 days following approval of the proposed license amendment, due to the implementation activities (e.g., training, procedure changes, etc.) associated with the proposed changes to Technical Specifications.

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In this submittal, Duke makes the following commitments:

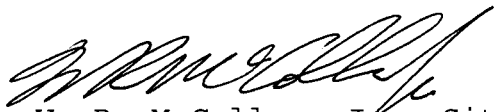
- 1) The ADV flow paths will be included in our QA-5 program; and
- 2) Maintenance of the component cooling system while the HPI System is degraded will be controlled via the maintenance rule configuration management program.

In accordance with Duke administrative procedures and the Quality Assurance Program Topical Report, this proposed license amendment has been previously reviewed and approved by the Oconee Plant Operations Review Committee and the Duke Corporate Nuclear Safety Review Board.

Pursuant to 10 CFR 50.91, a copy of this proposed license amendment is being sent to the State of South Carolina.

Inquiries on this matter should be directed to J. E. Burchfield, Jr. at (864) 885-3292.

Very truly yours,



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

Attachments

U. S. Nuclear Regulatory Commission

December 16, 1998

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xc w/attachments:

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Bureau of Land & Waste Management


Department of Health & Environmental Control

2600 Bull Street

Columbia, SC 29201

AFFIDAVIT

W. R. McCollum, Jr., being duly sworn, states that he is Site Vice President of Duke Energy Corporation; that he is authorized on the part of said corporation to sign and file with the Nuclear Regulatory Commission this revision to the Oconee Nuclear Station License Nos. DPR-38, DPR-47, and DPR-55; and that all statements and matters set forth therein are true and correct to the best of his knowledge.



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

Subscribed and sworn to me: 12-16-98  
Date

Notary Public: Conice M. Breayale

My Commission Expires: 2-12-2003  
Date

SEAL