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See Proposed Change To Tech Specs

SUBJECT: Forwards response to RAI & certifications for proposed replacement electrical Tech Specs for Units 1, 2 & 3.

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May 7, 1998

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Technical Specification 3.7 Amendment
Request Supplement
TAC No: 86027, 86028, 86029
TSC No: 93-03

In a submittal dated March 11, 1993, Duke Energy Corporation (Duke) proposed changes to Oconee's electrical Technical Specifications, Sections 3.7 and 4.6. These changes will reformat the sections into a single section which is arranged similar to the Babcock and Wilcox (B&W) Standard Technical Specifications. In addition, several technical changes to the electrical Technical Specifications were included in the proposed amendment.

During the review of this amendment, the NRC had several questions which were listed in a letter to Duke dated September 29, 1993. In order to resolve the questions, a meeting was held on October 7, 1993. Written responses to these questions were provided in Duke letters dated November 29, 1993, and December 6, 1993. In addition, the need to supplement the original Technical Specification amendment request was identified during the October meeting.

Following the NRC's review of the written responses, several items were identified as needing further clarification. The NRC discussed these items with Duke during the fourth quarter of 1994. Also, additional issues were identified by the NRC reviewers in the first quarter of 1995. A conference call was conducted between the NRC and Duke on March 8, 1995, to discuss the open issues and provide additional clarification of earlier

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responses. The written response to the issues which were discussed during the March 8, 1995, conference call was provided to the NRC in a letter dated October 3, 1995.

In addition to the responses contained in the correspondence associated with the proposed Technical Specification amendment, Duke committed to change the Oconee electrical Technical Specifications in response to the NRC's draft reports on the Oconee emergency power system. The associated commitments are contained in the Duke letter dated October 31, 1996.

In a letter dated February 27, 1997, Duke supplemented the Technical Specification 3.7 amendment request. The supplement addressed all previous commitments that Duke had made in regards to the associated amendment request.

After further discussions with the NRC and internal reviews by Duke, additional changes to the Technical Specification 3.7 amendment request were identified. The majority of the changes were the result of Duke's review during the conversion of the current Technical Specifications to the Standard Technical Specifications. These changes were provided to the NRC in a letter dated September 3, 1997.

Following the NRC review of the supplemental information that was provided on September 3, 1997, an additional NRC request for information was sent to Duke in a letter dated November 14, 1997. In Attachment 1, this letter responds to the NRC's request for additional information. In addition, Attachment 2 contains revised pages to the proposed Technical Specification revision. Attachment 3 contains a marked up copy of the associated September 3, 1997, submittal.

Attachment 2 also contains revisions to the Technical Specification Section 3.7 pages which resulted from a Technical Specification amendment that was dated February 26, 1998. The Technical Specification amendment revised the surveillance frequencies in the Oconee Technical Specifications from "refueling" to "18 months". In order to be consistent with the current Technical Specifications, the refueling surveillance frequencies in the Technical Specification Section 3.7 submittal have been revised to an 18 month surveillance frequency.

The information in this letter does not modify the original Environmental Impact Analysis or No Significant Hazards Consideration dated August 26, 1993.

This submittal contains a commitment to incorporate the necessary revisions in Attachment 2 into the Oconee Improved Technical Specification submittal. Additional details on this commitment are contained in the Duke responses to Questions 4, 6, and 14.

Duke is reviewing the activities that are required to implement the Technical Specification 3.7 amendment. Currently, this review indicates that a 6 month implementation period is necessary for the implementation of this amendment. A 6 month implementation period could overlap the implementation of Oconee's Improved Technical Specifications. In order to prevent plant document changes and training on an amendment request that could be in effect for a brief period of time, Duke requests that the implementation of the proposed Technical Specification 3.7 amendment request be concurrent with the implementation of Oconee's Improved Technical Specifications.

If there are any additional questions, please contact Michael Bailey at (864) 885-4390.

Very truly yours,

WR McCollum / Self

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Site Vice President
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MEB

Attachments

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