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SUBJECT: Provides Duke Energy Corp interpretation of Oconee TS 5.5.10, in regard to dispositioning steam generator tube end anomalies identified during performance of steam generator tube surveillance program described in TS 5.5.10.

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September 7, 1999

U.S. Nuclear Regulatory Commission  
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Washington, DC 20555

Subject: Oconee Nuclear Station, Units 1, 2, and 3  
Docket Nos. 50-269, 50-270, and 50-287  
Steam Generator Tube End Anomalies -  
Interpretation of Technical Specification 5.5.10, § 8

The purpose of this letter is to provide Duke Energy Corporation's (Duke) interpretation of Oconee Technical Specification (TS) 5.5.10, in regard to dispositioning Steam Generator (SG) Tube End Anomalies (TEA) identified during performance of the SG Tube Surveillance Program described in TS 5.5.10. TS 5.5.10 requires inspection of SG tubing to ensure operability until the next inspection.

TS 5.5.10, § 8, Tube Inspection, contains a statement which has previously been subject to various interpretations. The first sentence of this section defines a tube inspection as the inspection of a SG tube from the point of entry to the point of exit. The discussion relates to how this "point of entry" and "completely to the point of exit" relates to the pressure boundary between primary and secondary pressure in the SG.

Duke's position is that the portion of a SG tube end that extends beyond the top of the cladding is not part of the pressure boundary since it is beyond the point of exit from the SG secondary side. The SG tube end beyond the top cladding is therefore excluded from the SG tube inspections. The enclosed figure illustrates the region of the tube end above the top of the cladding that Duke does not consider to be part of the pressure boundary.

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

Very truly yours,

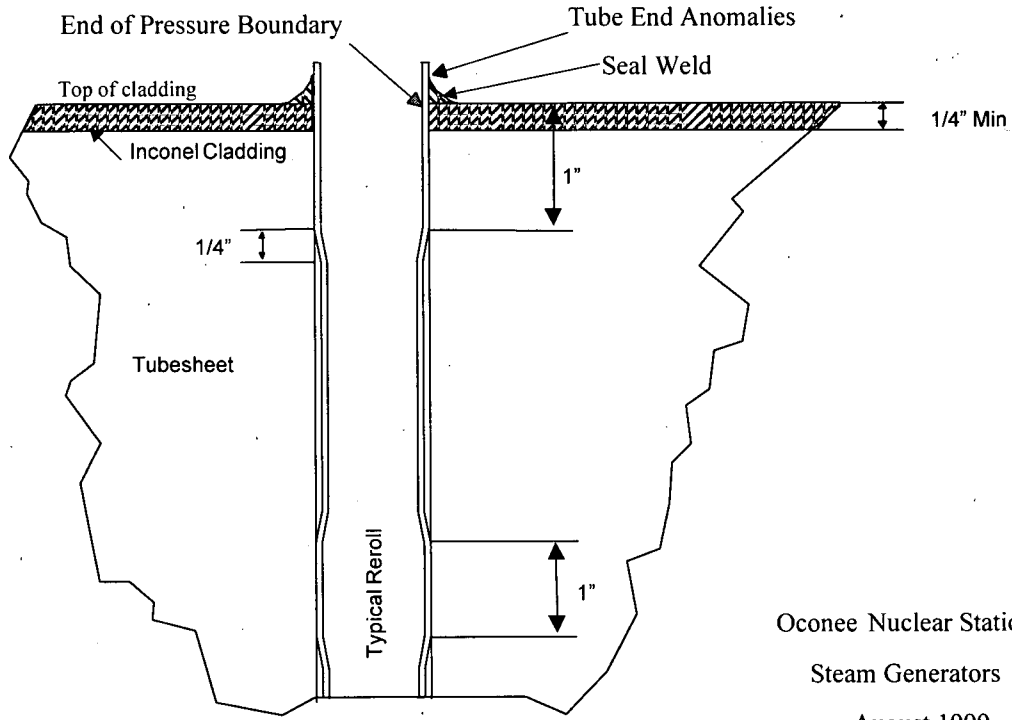


W. R. McCollum, Jr.,  
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Enclosure

ENCLOSURE

# OTSG Tube to Tubesheet Pressure Boundary Detail



Oconee Nuclear Station  
Steam Generators  
August 1999

Dimensions Typical

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