



Duke Energy Corporation

Oconee Nuclear Station

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Vice President

November 30, 1998

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

Subject: Oconee Nuclear Site
Docket Nos. 50-269, -270, -287
Extension of Due Date for Corrective Action
Addressed in Violation Response 98-07-03

By letter dated June 4, 1998, Duke Energy Corporation (Duke) committed to revise the control room dose analyses for the steam generator tube rupture accident, main steam line break accident, and rod ejection accident (calculations OSC-6810, OSC-6922, and OSC-6811, respectively) by December 1998. This item is one of the corrective actions in response to Violation 98-07-03. Reanalysis of the aforementioned engineering calculations is currently in progress. However, completion of the on-going control room habitability design study is desired prior to finalizing the revisions to these calculations. The purpose of this letter is to inform the staff that the subject calculation revisions will be completed by May 1999.

During the May 19, 1998 predecisional enforcement conference, Duke informed the Region II staff that Oconee Nuclear Site was undertaking a control room habitability design study. The intent of this study is to propose and evaluate analytical, operational, and/or design options needed to bring the station in full conformance with its control room habitability design and licensing bases. Duke also requested a meeting with the staff in November 1998 to

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discuss results from this design study and resolution of the control room habitability issues discussed at the predecisional enforcement conference. Developments over the past several months indicate that some of the Oconee issues are generic and will most likely be addressed on an industry basis. Based on discussions with Region II and the Oconee NRR Project Manager, both organizations agreed that it would be more beneficial to delay the meeting on Oconee control room habitability issues until next year. Duke will continue to work with the staff to establish a meeting date that is agreeable to both organizations.

The control room habitability design study commenced in August 1998 and is currently in progress. Duke has contracted with Stone & Webster Engineering Corporation (SWEC) to provide engineering consulting services and control room dose analyses for the design basis maximum hypothetical accident (MHA). At this time, SWEC is performing dose analyses that will serve as input to Duke's evaluation of potential solutions to the control room habitability issues addressed in NRC Inspection Report 98-03. The MHA portion of the design study is projected to be completed and documented by March 1999.

In parallel to the SWEC activities, Duke is presently performing a comprehensive evaluation of the control room doses arising from the Oconee non-LOCA accidents. The reanalysis of the control room doses for the steam generator tube rupture accident, main steam line break accident, and the rod ejection accident is part of this parallel effort. Presently, Duke is adopting Bechtel's LOCADOSE computer code to estimate the control room doses arising from the complex fission product release patterns associated with accidents involving secondary-side releases. Duke is also incorporating NRC staff review comments (communicated in an NRC RAI letter dated April 13, 1998) into the UFSAR Chapter 15 main steam line break accident transient analyses that provide inputs to the offsite and control room dose analyses. Enhancements and refinements to supporting calculations (e.g. control room atmospheric dispersion factors specific to a variety of secondary-side fission product release points) are also being made.

Duke also plans to examine control room operator doses in light of the technical information regarding accident progression and the characteristics of the alternate accident source term described in NUREG-1465. The rationale behind this approach is three-fold:

- a) to ensure that options developed based upon Oconee's licensing-basis TID-14844 source term will provide the required levels of control room radiological protection, relative to the technical bases behind the alternate source term,
- b) to examine any potential benefits that can be gained by pursuing the incorporation of the alternate source term into Oconee's licensing basis and,
- c) to identify any issues that could apply to the non-LOCA accident analyses.

Therefore, Duke will complete the design study in March 1999 and the revisions to the control room dose analyses in engineering calculations OSC-6810, OSC-6811, and OSC-6922 by May 1999. In addition, Duke will work with the staff to establish a meeting date in 1999 to discuss Oconee control room habitability issues.

If there are any questions regarding this submittal, please contact Edwin Price Jr. at (864) 885-4388.

Very truly yours,



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Site Vice President
Oconee Nuclear Site

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cc: L. A. Reyes, Regional Administrator
Region II

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