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PARKER,W.O. Duke Power Co.
RECIP.NAME RECIPIENT AFFILIATION
DENTON,H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards proposed revision to Tech Spec which eliminates 6 hr time limit for burning of contaminated oil in any calander quarter & justification for request.

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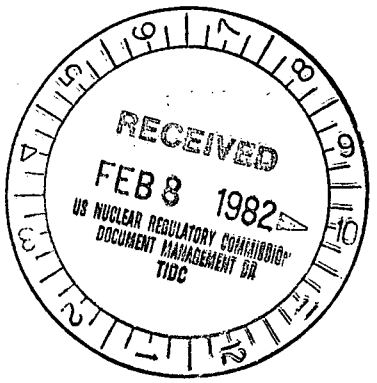
WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

TELEPHONE: AREA 704
373-4083

February 3, 1982



Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. J. F. Stolz, Chief
Operating Reactors Branch No. 4

Re: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287

Dear Sir:

Pursuant to 10 CFR 50, §50.90, please find attached a proposed revision to the Oconee Nuclear Station Technical Specifications which eliminates the six hour time limit for the burning of contaminated oil in any calendar quarter. The justification for this request is provided in Attachment 1. The proposed change, which includes the deletion of Specification 3.10.9.c, is provided in Attachment 2.

This proposed revision to the Oconee Nuclear Station Technical Specifications is considered to consist of one Class III and two Class I license amendments. Therefore, pursuant to 10 CFR 170, §170.12, please find enclosed a check in the amount of $4,800 for all applicable licensing fees.

Your prompt review and approval of this request would be appreciated.

Very truly yours,

William O. Parker, Jr.

RLG/php
Attachments

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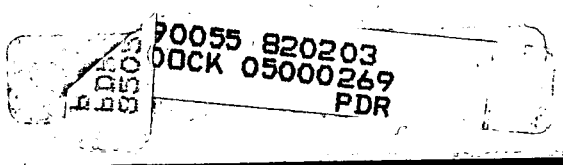
$4800.00



WILLIAM O. PARKER, JR., being duly sworn, states that he is Vice President of Duke Power Company; that he is authorized on the part of said Company to sign and file with the Nuclear Regulatory Commission this request for amendment of the Oconee Nuclear Station Technical Specifications, Appendix A to Facility Operating Licenses 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.

William O. Parker, Jr., Vice President

Subscribed and sworn to before me this 3rd day of February, 1982

Notary Public

My Commission Expires:

September 20, 1984

DUKE POWER COMPANY
OCONEE NUCLEAR STATION

JUSTIFICATION FOR ELIMINATION
OF OIL INCINERATION TIME LIMIT

In the last three quarters of 1981, Oconee Nuclear Station incinerated 2848 gallons of contaminated oil in the auxiliary boiler per Technical Specification Amendments 95, 95, and 92 for license Nos. DPR-38, DPR-47 and DPR-55. From this experience, we found that the 6 hours per quarter burn time is unjustifiably restrictive and request that it be eliminated. Because of this time limit and the low feed rate experienced in the actual incineration, the inventory of contaminated waste oil has increased during this period rather than decreased. At the time we received the Technical Specification amendments, the inventory was under 10,000 gallons. Presently, it is over 10,200 gallons in spite of efforts to prevent unnecessary contamination of oil.

The reason for the small volume of oil burned during a cumulative burn time of 18 hours was because of the load following characteristics of the boiler. The oil feed is regulated by a feedback from the auxiliary header steam load. A decrease in steam load results in a decrease in oil feed. Since this is an automatic load following boiler, we have no means of increasing our feed rate while maintaining a proper ratio of waste oil to No. 2 fuel oil in the feed.

Upon reviewing the NRC safety analysis of the Technical Specification change, we found no technical, safety, or radiological justification for the time limit. The following facts are the basis for this conclusion:

1. The safety analysis concluded that an instantaneous release of all the activity contained in a given volume (24 drums) of the oil would result in negligible offsite doses. Since the maximum feed rate possible is 5 gpm due to pump discharge head, and the actual feed rate in practice is often less than 2 gpm, the potential for undesirable releases is physically impossible.

2. The quantities of radioactivity allowed in each 55 gallon volume are exempt quantities. This oil is fed at a 2-5 gpm flow rate into a 10-12 gpm feed stream of No. 2 fuel oil. The resulting release rates are required to be limited so that airborne concentrations are 0.5 of 10 CFR 20 Appendix B. This airborne release rate limit is easily met by fulfilling the concentration limit in the oil; therefore, the opportunity for a significant airborne release rate is physically and administratively prohibited.

3. Before the oil is fed to the boiler, the oil is sampled and a gamma analysis is performed. This analysis identifies each radionuclide present and its concentration. This data is used to calculate release rates, etc., and then the total radionuclide inventory is recorded in our airborne release records as a particulate release; thus, the activity

released is used in determining offsite doses for the whole station, documenting that there is not an impact on offsite dose commitments.

4. The safety evaluation performed by the NRC concluded that the offsite dose was negligible and then stated that the assumptions used were conservative by a factor of 10 or more.

Based on this information, there is no technical reason for the time limit since the risk of unacceptable environmental releases and exposures to the population is not effected by the length of burn time when the maximum potential release rate is so low. A greater safety hazard is resulting from the continued storage of the oil, which is now classified as a hazardous chemical waste. With the present time restriction, our ability to eliminate the inventory of contaminated oil with its attendant storage problems is severely hampered.