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SUBJECT: Responds to RAI re application of ratio procedure described  
 in Position 2.1 of RG 1.99, Rev 2 to plant PT limit curves &  
 LTOP limits.

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**DUKE POWER**

October 17, 1996

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Subject: Oconee Nuclear Station  
Docket Nos. 50-269, 270, 287  
Response to Request for Additional Information  
Concerning the Application of the Ratio  
Procedure as Described in Position 2.1 of RG  
1.99, Revision 2 to the Oconee Nuclear Station  
Pressure-Temperature Limit Curves and LTOP  
Limits

By letter dated August 6, 1996, the NRC acknowledged receipt of the Duke Power response to Generic Letter 92-01, Revision 1, Supplement 1 and considered the RPV integrity data for the Oconee Nuclear Station Units 1, 2 and 3 to be complete and this issue closed. However, as a separate issue, the NRC staff requested that Oconee Nuclear Station provide an assessment of the application of the ratio procedure, as described in Position 2.1 of RG 1.99, Revision 2 (May 1988) to their pressure-temperature (P-T) limit curves and LTOP limits. The NRC also requested that the assessment include an evaluation relative to the margins specified in applicable codes and standards (i.e., Appendix G to Section III of the ASME Code). The NRC requested that this assessment be provided by December 31, 1996.

Oconee Nuclear Station has completed this assessment. In summary, current Oconee Nuclear Station Unit 1, 2, and 3 P-T limit curves are valid for 21, 19, and 21 EFPY, respectively. All three units are presently operating at approximately 16.5 EFPY. Duke Power has contracted with Framatome Technologies Incorporated to calculate updated P-T limit curves during the last quarter of 1997. The revised P-T limit curves will evaluate the ratio procedure

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and address any effects. Preliminary effects of the ratio procedure reveal only a limited impact on the existing P-T limit curves; therefore, Duke Power has determined that adequate margin exists in the current P-T limit curves to address the ratio procedure until the revised P-T limit curves are generated. In conclusion, the LTOP and P-T limits in the Technical Specifications remain valid. These evaluations were in accordance with the requirements of 10 CFR 50.60, 10 CFR 50.61 and Appendices G and H to 10 CFR 50.

I declare under penalty of perjury that these statements are true and correct to the best of my knowledge.

Should you have any questions or require any additional information regarding this subject, please call William Brady at (704) 382-6357.

Very truly yours,



M.S. Tuckman  
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U.S. NRC  
October 17, 1996  
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