

DUKE POWER COMPANY

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June 8, 1988

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

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

Dear Sir:

By letter dated September 12, 1984 Duke Power Company (Duke) submitted a proposed technical specification amendment for the Oconee Nuclear Station concerning changes to Specification 3.3.3, Core Flood Tank (CFT) System. Supplemental information was provided by a letter dated November 22, 1985. In addition, by a letter dated August 28, 1986 the NRC staff requested additional information regarding the proposed amendment. Duke provided a response by a letter dated October 28, 1986. As a follow-up to these submittals, please find attached (Attachment 1) a revised amendment request concerning Specification 3.3.3. The proposed changes to the September 12, 1984 Duke letter are as follows:

1. Replace page 3.3-2 with page 3.3-2 provided by this letter.
2. Replace page 3.3-6 with page 3.3-6 provided by this letter.

The difference between the proposed Technical Specification Amendment Request provided by the September 12, 1984 letter and that provided by this letter are:

1. The allowable time for operating in a degraded mode (less than 1835 ppm boron in a CFT) is 24 hours instead of the 48 hours provided in the original technical specification amendment request.
2. The deletion of a sentence in the proposed revision to the Bases. The original technical specification amendment request included a statement in the Bases stating that the CFT boron concentration is set by maintaining it at the same boron concentration as the Borated Water Storage Tank (BWST). This is not a valid statement, as such should not be included in the Bases.

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Attachment 2 provides a revised No Significant Hazards Consideration Evaluation in support of the proposed technical specification change. The result of this evaluation is that the proposed amendment warrants a No Significant Hazards Consideration. By copy of this letter, Duke is forwarding this submittal to the South Carolina Department of Health and Environmental Control.

The proposed revision will allow for timely restoration of the boron concentration in a CFT. The current technical specification does not allow sufficient time to take corrective action, analyze the results of the corrective action, and verify compliance with the specification or take additional corrective actions as necessary. The proposed revision to allow for a short period of operation, with a CFT boron concentration less than 1835 ppm, will provide greater operational flexibility and sufficient time to correct minor problems that may occur which may impact the boron concentration within the CFT.

In the past 45 reactor-years of operations of Oconee, there have only been five (5) minor occurrences of low CFT boron levels. In all cases, the corrective actions taken to restore boron concentration levels to comply with technical specification requirements were successfully accomplished within approximately 30 hours. Given the low number of minor occurrences and the short period of time allowed for the proposed degraded operating mode, Duke contends that no additional safety hazard is involved with the proposed technical specification revision.

In addition, administrative and procedural controls are in place to farther minimize the possibility of minor occurrences resulting in a boron concentration level less than specification limits (less than 1835 ppm). By procedures, operators initiate boron analysis samples after any liquid addition to the CFT. Also, the operators are trained to investigate the cause and evaluate the consequences of any unexplained level changes in the CFT. Statalarms will alert operators of CFT level increases. The response procedures for this statalarm direct the operator to determine the cause. Further, procedure changes have been implemented to raise the normal operating CFT boron concentration to greater than 2500 ppm. Changes have also been made to all operating procedures dealing with pumps used to make up to the CFTs. Duke believes these administrative and procedural controls will further minimize the low boron concentration occurrences.

In summary, the effect of the revision of Technical Specification 3.3.3 is to establish a degraded mode of operation if a CFT boron concentration falls below 1835 ppm. This will enable timely restoration of the boron concentration and prevent imposing an unnecessary forced shutdown transient on the plant. The CFTs are not normally used during normal operation of the plant. Assumptions used in

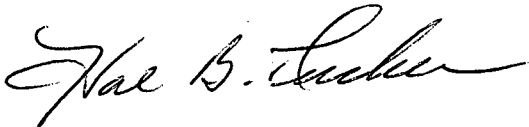
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safety analysis will not be violated if the plant is allowed to continue to operate for a short period of time if the boron concentration in one CFT decreases below 1835 ppm because the necessary core cooling capability is still assured. Therefore, this revision to the technical specifications increases operational flexibility while involving no additional safety hazard.

Very truly yours,



Hal B. Tucker

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Attachment(s)

cc: Ms. Helen Pastis
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Washington, DC 20555

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