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SUBJECT: Responds to NRC 881108 request for addl info re 861016 application for amend to Licenses DPR-38, DPR-47 & DPR-55.

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**DUKE POWER**

December 22, 1988

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

Subject: **Oconee Nuclear Station**  
Docket Nos. 50-269, -270, -287  
**Penetration 22**

Gentlemen:

By my letter of October 16, 1986, I submitted a proposed amendment to Technical Specifications to require a Type C local leak test for Penetration 22. By letter dated November 8, 1988 the NRC requested additional information regarding the amendment request. Please find attached (Attachment 1) a response to the request for additional information. Attachment 2 provides a supplement to the subject amendment request in which an inappropriate footnote regarding reverse direction testing has been deleted. The remainder of the October 16, 1986 amendment request including the Technical Justification and no significant hazards consideration evaluation remain valid.

Inasmuch as this change is a supplement to a previous amendment request, no license fees are required.

Very truly yours,

Hal B. Tucker

PJN/452/nmf

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December 22, 1988  
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**ATTACHMENT 1**

Response to November 8, 1988 NRC Request For Additional Information

Response to November 8, 1988 NRC Request for Additional Information

REQUEST

Clarify why for 10CFR 50 Appendix J Type A tests penetration 22 is not vented.

RESPONSE

The piping inside the reactor building on penetrations 21 and 22 form a closed loop which is seismically designed. Each of these penetrations has an electric motor operated containment isolation valve outside the reactor building which closes on an engineered safeguards signal. The redundant means of containment isolation for both penetrations is the closed loop inside.

Since the inside piping is seismic and forms a closed loop, these penetrations need not be vented for a Type A test.

REQUEST

Clarify why footnote 9 which allows reverse direction testing is appropriate for this penetration.

RESPONSE

Upon further review, Duke has determined that footnote 9 does not apply to Penetration 22. Penetration 22 is not currently tested in the reverse direction. The amendment request supplement provided in Attachment 2 deletes footnote 9. The remainder of the October 16, 1988 amendment request including the technical justification and no significant hazards consideration evaluation remain valid.