# AEC DISTERIOR FOR PART 50 DOCKET MATERIAL (TEMPORARY FORM)

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1-R. CARROLL- C, GT-B227

1- R. CATLIN, E-256-GT

1- CONSULTANT'S

SENT TO LIC ASST. NEWMARK/BLUME/AGABIAN GOULBOURNE ON 3-9-731- GERLAD ULRIKSON....ORNL

1-PDR-SAN/LA/NY
1- GERALD LELLOUCHE
BROOKHAVEN NAT. LAB
1-AGMED(WALTER KOESTER,
RM C-427, GT)
1- RD...MULLER...F-309GT

# DUKE POWER COMPANY

### Power Building

422 South Church Street, Charlotte, N. C. 28201

A. C. THIES
SENIOR VICE PRESIDENT
PRODUCTION AND TRANSMISSION

April 4, 1973



P. O. Box 2178

Mr. R. C. DeYoung, Assistant Director for Pressurized Water Reactors Directorate of Licensing U. S. Atomic Energy Commission Washington, D. C. 20545

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

Dear Mr. DeYoung:

In response to your letter of December 15, 1973, we wish to comment on those items enclosed in your letter under the heading, "Units 1 and 2 and Units 1, 2, and 3 Operations":

Item 5 Specification 3.9 - Objective d.

The annual average concentration of dissolved gases in liquid waste of 4 x  $10^{-7}~\mu\text{Ci/ml}$  is excessively conservative since it assumes complete immersion in water for a full year. An occupancy factor based on complete immersion for 200 hours per year yields an average concentration limit of 1.6 x  $10^{-5}~\mu\text{Ci/ml}$ . The inclusion of the occupancy factor is in accordance with 10 CFR 20.106(b), and we propose to change the concentration limit in Objective d. to 1.6 x  $10^{-5}~\mu\text{Ci/ml}$ .

Item 6 Specification 3.9.2

Using the occupancy factor based on immersion for 200 hours per year, the appropriate quarterly average concentration is found to be 3.2 x  $10^{-5}~\mu\text{Ci/ml}$ . Specification 3.9.2 will be revised to read:

"The release of radioactive liquid effluents, excluding tritium and dissolved noble gases, shall not exceed 10 curies during any calendar quarter without specific approval of the Commission. The concentration of tritium prior to release from the Restricted Area shall not exceed an average of 4 x  $10^{-5}$  µCi/ml during any calendar quarter. The concentration of dissolved noble gases prior to release from the Restricted Area shall not exceed an average of 3.2 x  $10^{-5}$  µCi/ml during any calendar quarter."

Mr. R. C. DeYoung Page 2 April 4, 1973

# Item 7 Specification 3.9.3

The appropriate instantaneous concentration for dissolved noble gases, again using an occupancy factor based on 200 hours per year immersion, is 1.6 x  $10^{-3}$  µCi/ml. We propose to revise Specification 3.9.3 by adding a maximum instantaneous concentration of 1.6 x  $10^{-3}$  µCi/ml for dissolved noble gases.

# Item 8 Specification 3.10, Objective 1

Objective 1 will be changed from  $\leq 4340 \text{ m}^3/\text{sec}$  to  $\leq 5560 \text{ m}^3/\text{sec}$  in the next revision to the FSAR.

## Item 9 Specification 3.10.2

This typographical error will be corrected in the next revision to the FSAR.

## Item 10 Specification 3.10, Bases

The dispersion factor will be changed from 4.61 x  $10^{-6}$  sec/m<sup>3</sup> to 3.6 x  $10^{-6}$  sec/m<sup>3</sup> in the next revision to the FSAR.

# Item 11 Specification 4.11.1

This addition will be made in the next revision to the FSAR.

## Item 12 Specification 4.2.8

This specification was changed as requested in Revision 26 for Units 1 and 2. For Unit 3, the Reactor Vessel Surveillance Program is based on equivalent exposure times of 1.8, 13.3, 26.7, and 30.0 years. The specimens have been selected and fabricated as specified in ASTM-E-185-72.

### Item 13 Table 4.11.1

These additional analyses will be added in the next revision to the FSAR.

#### Item 14 Specification 6.1.1.6.b

The assignment of a licensed Reactor Operator to a reactor, with a licensed Senior Reactor Operator available at the station at all times, is adequate to ensure plant safety when that reactor is in a cold shutdown condition.

## Item 15 Specification 6.1.1.6.e

We believe one operator per shift can adequately handle all routine station health physics requirements. For non-routine events, if additional

Mr. R. C. DeYoung Page 3 April 4, 1973

health physics personnel are needed, they will be called in to assist.

Item 16 Proposed Specification 6.1.1.6.f

For three-unit operation, we have made provisions for a minimum shift complement of three licensed Senior Reactor Operators, four persons with Reactor Operator licenses, and four unlicensed operators. This shift staffing is more than adequate for station operation, even during periods when the computer may be inoperable. Additional manpower can be called in, if necessary, for special tests.

Sincerely,

A. C. Thies

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