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P. O. Box 2178

May 7, 1975

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Mr. Angelo Giambusso, Director Division of Reactor Licensing U. S. Nuclear Regulatory Commission Washington, D. C. 20555

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

Dear Mr. Giambusso:

An October 17, 1974 letter from Mr. R. A. Purple requested that a proposed change to the Oconee Nuclear Station Technical Specifications, in the form of an application for license amendment. establishing reporting requirements in accordance with NRC Regulatory Guide 1.16, or providing justification for any departure from the guide, be submitted as soon as practicable before December 1, 1974. On November 27, 1974, a letter was transmitted which described several concerns which precluded wholesale adoption of Regulatory Guide 1.16, Revision 2, and advised of our schedule for submittal. Subsequently, on January 15, 1975, a change to the Oconee Technical Specifications was requested which essentially adopted Regulatory Guide 1.16, Revision 3.

As you are aware, station reporting requirements are a continuing online function. Several of our current reports, such as the Semiannual
Operating Report, have had their periodicity as well as content
substantially altered and the requirement for other, such as the First
Year Operating Report, has been deleted by the requested change. It
is obvious, therefore, that the lack of information as to when, or if,
action on the proposed revision will be forthcoming is a definite
handicap in our planning. Consequently, we request that the subject
proposed Technical Specification revision be approved and issued by
June 13, 1975. If such action is not achievable within this time
period, however, we do currently plan to submit the Semiannual Operating
Report in accordance with the requested change, i.e., as an Annual
Operating Report.

Mr. Angelo Giambusso Page 2 May 7, 1975

On some occasions we have had a relatively short time schedule imposed for preparation of Technical Specification changes only to find the Nuclear Regulatory Commission taking much longer to review and approve them. It would be most helpful if these changes could be reviewed and approved in a manner timely enough to permit the applicant to plan for and prepare the necessary reports without confusion and duplication of effort.

Very truly yours,

A. C. Thies

ACT: vr