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A. C. THIES Senior Vice President Production and Transmission

August 5, 1974

Mr. L. Manning MuntzingDirector of RegulationU. S. Atomic Energy CommissionWashington, D. C. 20545

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

Dear Mr. Muntzing:

On January 4, 1974 the AEC issued the Final Acceptance Criteria (FAC) for the Emergency Core Cooling System (ECCS) evaluation as revisions to 10 CFR 50. In Compliance with these revisions, Babcock & Wilcox has developed an evaluation model which meets the requirements of Appendix K of 10 CFR 50. The description of this model is contained within their non-proprietary topical report BAW-10091, "B&W's ECCS Evaluation Model Report with Specific Application to 177 FA Class Plants with Lowered Loop Arrangement," which has been submitted to the Directorate of Licensing on August 5, 1974. In addition, B&W has provided supporting documentation for the computer codes utilized in this model in the following non-proprietary topical reports:

- BAW-10092, "CRAFT 2- Fortran Program for Digital Simulation of a Multinode Reactor Plant During Loss of Coolant."
- BAW-10093, "REFLOOD Description of Model for Multinode Core Reflood Analysis."
- 3. BAW-10094, Babcock & Wilcox Revisions to THETAL-B, a Computer Code for Nuclear Reactor Core Thermal Analysis - IN-1445.
- BAW-10095, Babcock & Wilcox Revisions to CONTEMPT Computer Program for Predicting Containment Pressure - Temperature Response to a Loss-of-Coolant Accident.

The analysis presented in BAW-10091 for the B&W 177 FA plants with lowered loop is generic in nature, since the plant parameters utilized in the analysis (such as the rated power level, fuel densification and containment building volume) are taken to be the most conservative values for all the plants of this type. Thus, the results contained in BAW-10091 provide an overly conservative analysis for all plants of this type and can be applied to Oconee Units 1, 2, & 3. As Mr. L. Manning Muntzing Page 2 August 5, 1974

such we adopt the results contained in BAW-10091. These results demonstrate conformance to the criteria of 10 CFR 50.46 under the following operating conditions:

- 1. The peak linear heat rate is less than or equal to 17.2kW/ft at the six foot elevation.
- 2. The Oconee Units 2 & 3 are operated within the attached revised Technical Specifications for the loss-of-coolant limits. These revisions were established on the basis of the LOCA limits as established from the FAC ECCS analysis (BAW-10091).
- 3. Oconee Unit 1 which has achieved in excess of 200 effective full power days of operation, can meet the final acceptance criteria as published in 10 CFR 50.46 without any changes to the existing technical specifications. Figure 1 shows the LOCA limit curve and the maximum operating peaks which are allowed under present technical specifications. Since in all cases the operating peaks, using existing technical specification limits, are below the LOCA limit the Final Acceptance Criteria are met.

Revisions to the rod withdrawal limits contained in the Oconee Nuclear Station Technical Specifications will be implemented on August 5, 1974. Continued operation of Oconee Units 1, 2, and 3 at rated power will be in compliance with 10 CFR 50.46. Technical specifications will be developed specifically for Oconee Units 2 and 3 using the methods developed in BAW-10091, and submitted to the AEC for review at a later date.

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Very truly yours,

s/A. C. Thies A. C. Thies

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