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FROM: <b>Duke Power Company</b> <b>Charlotte, N.C. 28201</b> <b>Mr. A.C. Thies</b>		DATE OF DOC <b>11-27-74</b>	DATE REC'D <b>12-3-74</b>	LTR <b>X</b>	TWX	RPT	OTHER
TO: <b>R.A. Purple</b>		ORIG <b>1 signed</b>	CC	OTHER	SENT AEC PDR <u>XXX</u>		SENT LOCAL PDR <u>XXX</u>
CLASS	UNCLASS <b>XXX</b>	PROP INFO	INPUT	NO CYS REC'D <b>1</b>	DOCKET NO: <b>50-269/270/287</b>		
DESCRIPTION:  <b>Ltr re our 10-17-74....concerning proposed changes to the tech specs....establishing reporting requirements in accordance with Rev. #2 to the Reg. Guide 1.16.....and adv that the amdt will be submitted by 1-10-74....</b>				ENCLOSURES:  <b>ACKNOWLEDGED</b>  <b>DO NOT REMOVE</b>			
PLANT NAME: <b>Oconee 1 thru 3</b>		FOR ACTION/INFORMATION		<b>12-4-74</b>	<b>JB</b>		

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EXTERNAL DISTRIBUTION

✓ 1 - LOCAL PDR <b>Walhalla, S.C.</b>	✓ 1 - TIC (ABERNATHY) (1)(2)(10)	✓ 1 - NSIC (BUCHANAN)	1 - ASLB	1 - Newton Anderson	✓ 1 - ACRS <del>COLLINS</del> SENT	1 - NATIONAL LABS	1 - ASLPIE W Bldg, Rm 5291	1 - W. PENNINGTON, Rm E-201 GT	1 - B&M SWINEBROOK, Rm E-201 GT	1 - CONSULTANTS	1 - NEWARK BLUME/AGBABIAN	1 - PDR SAN/LA/NY	1 - BROOKHAVEN NAT LAB	1 - G. ULRIKSON, OFNL	1 - AGMED (RUTH GUSSMAN)	Rm B-127 GT	1 - R. D. MUELLEN, Rm E-201 GT
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DUKE POWER COMPANY

POWER BUILDING

422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28201

A. C. THIES  
SENIOR VICE PRESIDENT  
PRODUCTION AND TRANSMISSION

P. O. Box 2178

November 27, 1974



Mr. Robert A. Purple, Chief  
Operating Reactors Branch I  
Directorate of Licensing  
Office of Regulation  
U. S. Atomic Energy Commission  
Washington, D. C. 20545

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

Dear Mr. Purple:

Your letter of October 17, 1974 requested that we submit, as soon as practical before December 1, 1974, a proposed change to the Oconee Technical Specifications in the form of an application for license amendment, establishing reporting requirements in accordance with Revision 2 to Regulatory Guide 1.16, "Reporting of Operating Information - Appendix A Technical Specifications."

On November 4, 1974, representatives of Duke Power Company attended a seminar in Atlanta, Georgia, which was held to familiarize licensee representatives from Region II with the provisions of the revised guide. This seminar was conducted by members of the Directorate of Regulatory Operations, Directorate of Regulatory Standards, Directorate of Licensing, and the Office of Operations Evaluation. The representatives from Duke Power Company joined other utilities in expressing concern in adopting all provisions of Revision 2 to Regulatory Guide 1.16. Members of the AEC staff conducting the seminar recognized the validity of many of these concerns, and informed us that another revision to Regulatory Guide 1.16 was being processed on an accelerated schedule. It was requested that formal comments on Regulatory Guide 1.16, Revision 2, be forwarded to the Secretary of the Commission for consideration in revising the guide. We intend to do this in the very near future.

In response to your letter of October 17, 1974, we are continuing our review of Revision 2 to Regulatory Guide 1.16 to determine which portions of that guide are appropriate for incorporation into the Oconee Technical Specifications. We recognize several areas which prevent wholesale implementation of the guide as presently written:

Mr. Robert A. Purple  
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1. Appendix A Technical Specifications for Oconee Nuclear Station include specifications concerning the release of radioactive effluents to the environment. Therefore, it is necessary for us to ensure the annual reporting requirements contained in Revision 2 to Regulatory Guide 1.16 are compatible with existing requirements.
2. Some portions of the reporting program described in Regulatory Guide 1.16 do not pertain to safety-related activities, and therefore, are not properly the subject of technical specifications.
3. In some instances, implementation of the reporting program contained in Regulatory Guide 1.16 would require the creation of elaborate control systems to ensure compliance with the technical specifications. In some cases, it would be impossible to demonstrate full compliance with the reporting requirements.

In addition to transmitting our comments concerning Revision 2 to Regulatory Guide 1.16 to the Secretary of the Commission, we will file an application for license amendment to incorporate those portions of the guide that we feel are appropriate for inclusion in the Oconee Technical Specifications. We plan to submit our application for license amendment prior to January 10, 1975.

Very truly yours,



A. C. Thies

ACT:vr