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FROM: Duke Power Company Charlotte, NC A C Thies		DATE OF DOC 2-27-75	DATE REC'D 3-5-75	LTR XX	TWX	RPT	OTHER
TO: Mr Giambusso		ORIG one signed	CC	OTHER	SENT AEC PDR <u>XX</u> SENT LOCAL PDR <u>XX</u>		
CLASS	UNCLASS XXXXXX	PROP INFO	INPUT	NO CYS REC'D 1	DOCKET NO: <u>50-269/270/287</u>		

DESCRIPTION:

Ltr re their 8-30-74 ltr.....furnishing comments concerning their steam generator tubing surveillance program.....

ENCLOSURES:

**ACKNOWLEDGED**

**DO NOT REMOVE**

PLANT NAME: Oconee 1, 2, &3

**FOR ACTION/INFORMATION**

3-5-75

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# DUKE POWER COMPANY

POWER BUILDING

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A. C. THIES  
SENIOR VICE PRESIDENT  
PRODUCTION AND TRANSMISSION

P. O. Box 2178

February 27, 1975

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

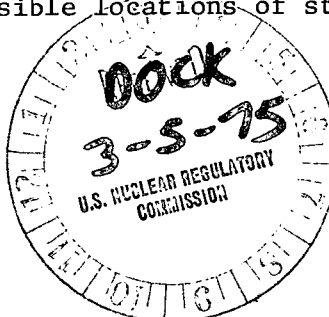
Re: Oconee Nuclear Station  
Docket Nos. 50-269, -270, -287

Dear Mr. Giambusso:

On August 30, 1974, a proposed revision to the Oconee Nuclear Station Technical Specifications was submitted to incorporate a program for steam generator tubing surveillance consistent with Regulatory Guide 1.83. This proposed technical specification revision was in response to Mr. Karl R. Goller's letter of July 18, 1974. Subsequent to this submittal, additional information concerning once-through steam generator (OTSG) tubing surveillance has become available to us and should be incorporated into the proposed technical specification. Therefore, it is requested that my submittal of August 30, 1974 be withdrawn from further consideration and review.

The Babcock & Wilcox Company forwarded comments on Regulatory Guide 1.83 to the Secretary of the Commission on August 26, 1974. It was B&W's position that Regulatory Guide 1.83 did not adequately reflect the important design and operating features of the OTSG which contribute to steam generator tube integrity. The essential differences between the OTSG and recirculation type steam generators as described in this submittal are:

1. The OTSG is not as susceptible to steam side corrosion attack because of the use of full flow condensate polishing with volatile chemical additives.
2. Solids, such as sodium phosphate, are not added.
3. The straight tube, straight shell configuration and broached tube support plate design minimize possible locations of stagnation.



2467

Mr. Angelo Giambusso  
Page 2  
February 27, 1975

4. The once-through mode of operation eliminates bulk concentrations of impurities.
5. Testing has been performed to assure freedom from vibration damage.

During refueling of Oconee Unit 1, the steam generators were inspected using the program described in Regulatory Guide 1.83. Information from this inspection is being evaluated; however, preliminary results indicate that the Unit 1 steam generators are exceptionally clean and free of detectable defects.

Duke Power Company is presently re-evaluating its program for steam generator tubing surveillance to properly reflect the design and operating features of the once-through steam generator and to incorporate experience gained during the Oconee Unit 1 steam generator inspection. Upon completion of this program re-evaluation, appropriate technical specifications for steam generator tubing surveillance will be submitted. Therefore, the request for amendment of the Oconee Nuclear Station Technical Specifications dated August 30, 1974 is rescinded.

Very truly yours,



A. C. Thies

ACT:vr