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FROM: Duke Power Co. Charlotte, N. C. William O. Parker		DATE OF DOC 10-31-75	DATE REC'D 11-4-75	LTR XX	TWX	RPT	OTHER
TO: Benard C. Rusche		ORIG NONE	CC 40	OTHER	SENT NRC PDR XXX		SENT LOCAL PDR XXX
CLASS	UNCLASS XXX	PROP INFO	INPUT	NO CYS REC'D 40	DOCKET NO: 50-269/270/287		

DESCRIPTION:
Ltr. notarized 10-31-75... Ltr. re our ltrs.
10-14-75 & 10-15-75... Trans the following.....

ENCLOSURES:
Additional information regarding ECCS Analysis
/With attachments 1-4.....

~~DO NOT REMOVE~~

ACKNOWLEDGED

(40 cys. Rec'd)

PLANT NAME: Oconee 1,2,3--

FOR ACTION/INFORMATION

VCR 11-5-75

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ECCS

DUKE POWER COMPANY

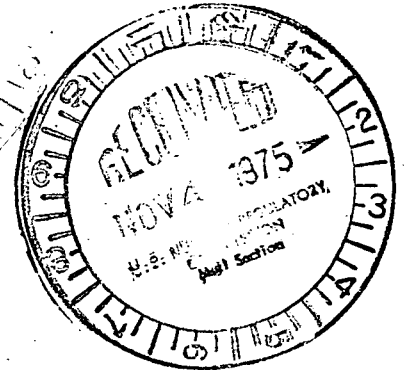
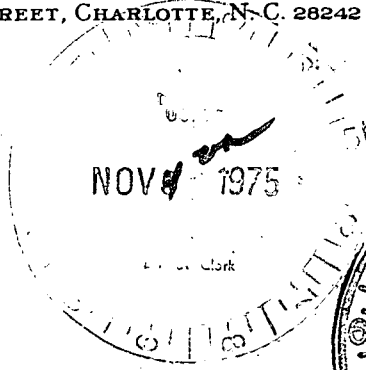
POWER BUILDING

422 SOUTH CHURCH STREET, CHARLOTTE, N.C. 28242

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

TELEPHONE: AREA 704
373-4083

October 31, 1975



Mr. Benard C. Rusche
Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. R. A. Purple, Chief
Operating Reactors Branch #1

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

Dear Mr. Rusche:

With regard to your letters of October 14 and 15, 1975 concerning requests for additional information relative to the Oconee Nuclear Station ECCS analysis, Attachments 1 and 2 are provided.

As you are aware, Amendment 6 of the Oconee Unit 1 Facility Operating License, DPR-38, revised Technical Specifications to permit operation within the appropriate fuel and core design limits during the second fuel cycle. The proposed control rod withdrawal limit for four-pump operation (Figure 3.5.2-1A2) after 250 ± 5 full power days of operation was not included. The omission of this curve was due to the expected approval of Technical Specifications based on the ECCS Final Acceptance Criteria before the curve would be required. On July 9, 1975, an analysis of Oconee ECCS performance using an approved evaluation model was submitted. This submittal included revised control rod withdrawal curves for Oconee 1 Cycle 2 operation.

Currently, Oconee Unit 1, Cycle 2 measured boron concentration data indicate that it may be necessary to begin removal of the Group 7 control rods from the core as early as 235 EFPD, rather than the originally estimated 245-255 EFPD. The associated small discrepancy, approximately 20 ppmB, between the measured and the predicted boron concentration at this core lifetime, is well within the tolerance of calculational uncertainties. In order to assure the continued full power operation of Oconee 1, revised Final Acceptance Criteria control rod position limits and operational power imbalance envelopes have been prepared which permit withdrawal of Group 7 control rods 245 ± 10 EFPD

Mr. Benard C. Rusche
Page 2
October 31, 1975

(in lieu of 250 + 5 EFPD proposed in July 9, 1975 submittal). Therefore, pursuant to 10CFR50, §50.90 and the provisions of the Commission's December 27, 1975 Order for Modification of License for Oconee Nuclear Station, Units 1, 2, and 3, it is requested that the control rod position limit and operational power imbalance envelope described in Attachment 3 be approved prior to attaining 235 EFPD on Oconee 1. Presently, with expected capacity factors, it is estimated that this will occur on November 28, 1975.

The limitation on power operation with one idle reactor coolant pump in each loop would be imposed since the ECCS cooling performance has not been calculated in accordance with the Final Acceptance Criteria requirements specifically for this mode of operation. Pursuant to 10CFR50, §50.90, a revision to Oconee Technical Specification 3.1.1 is requested which will permit operation for a period of five days with one idle reactor coolant pump in each loop. This time period could allow repairs to the idle pumps and the return to an acceptable combination of operating reactor coolant pumps. The five days for this mode of operation is acceptable since this mode of operation is expected to have considerable margin for the peak cladding temperature limit and since the likelihood of a LOCA within the five day period is considered very remote. Proposed Technical Specification replacement pages are provided in Attachment 4.

Very truly yours,

s/William O. Parker, Jr.
William O. Parker, Jr.

MST:vr

Attachments

Mr. Benard C. Rusche
Page 3
October 31, 1975

WILLIAM O. PARKER, JR., being duly sworn, states that he is Vice President of Duke Power Company; that he is authorized on the part of said Company to sign and file with the Nuclear Regulatory Commission this request for amendment of the Oconee Nuclear Station Technical Specifications, Appendix A to Facility Operating Licenses DPR-38, DPR-47 and DPR-55; and that all statements and matters set forth therein are true and correct to the best of his knowledge.

s/William O. Parker, Jr.
William O. Parker, Jr., Vice President

ATTEST

s/John C. Goodman, Jr.
John C. Goodman, Jr.
Assistant Secretary
(Seal)

Subscribed and sworn to before me this 31st day of October, 1975.

s/Edna B. Farmer
Notary Public
(Notarial Seal)

My Commission Expires:

October 24, 1977