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DESCRIPTION:

Ltr re our 12-27-75 order for modification .....trans the following:

ACKNOWLEDGED

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PLANT NAME: Oconeee 1-3

ENCLOSURES:

Proposed amdt to OL/Change to Tech Specs: Consisting of revised ECCS acceptance Criteria &-addl & supporting info for the change.....

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FOR ACTION/INFORMATION 7-14-75 ehf

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TO C. A. Shappard

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

July 9, 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, 50-270, 50-287

Dear Mr. Giambusso:

Pursuant to the Commission's December 27, 1974 Order for Modification of License for Oconee Nuclear Station, Units 1, 2 and 3, a re-evaluation of ECCS cooling performance has been performed. This re-evaluation utilized a calculational model conforming to the provisions of 10 CFR 50, Section 50.46. Based on this re-evaluation, Duke Power Company is submitting herewith proposed changes to Oconee Technical Specifications 3.1.3.5, 3.1.7, 3.5.2.3 and 3.5.2.5. The proposed revisions are indicated in the attached replacement pages (Attachment 1). The proposed changes to Specifications 3.1.3.5 and 3.5.2.3, which are necessary to incorporate minimum ejected rod worth criteria into the rod withdrawal limits, are comparable to those submitted on May 9, 1975 and are included here for completeness.

The evaluation model utilized in performing the re-evaluation of ECCS cooling performance is described in Babcock and Wilcox (B&W) non-proprietary Topical Report BAW-10104, "B&W's ECCS Evaluation Model." Non-proprietary Topical Report BAW-10103, "ECCS Evaluation of B&W's 177 FA Lowered Loop NSS," describes the results of the re-evaluation for a generic B&W unit of the Oconee class. Since the generic parameters used in the re-evaluation are conservative for units of this type, and the parameters associated with Oconee 1, 2 and 3 are bounded by those utilized in the generic analysis, BAW-10103 provides a conservative evaluation of ECCS performance for the Oconee units. In the case of Oconee 1, portions of the analysis presented in BAW-10103 were also performed utilizing specific Oconee 1 parameters. This analysis, and the results thereof, are described in Attachment 2.

The results presented in BAW-10103 and in Attachment 2 demonstrate the conformance of the Oconee units to the criteria of 10CFR50, Section 50.46

under the operating conditions specified in the attached proposed technical specifications.

In addition to the above, and in accordance with Mr. Robert A. Purple's letter of June 13, 1975 to Mr. A. C. Thies, the following information is also provided:

1. Break Spectrum and Partial Loop Operation

The requested information for operation with four reactor coolant pumps is presented in BAW-10103 and in Attachment 2. For operation with three or two reactor coolant pumps, the proposed Technical Specifications are based on ECCS limits for four pump operation and on ejected rod worth criteria. Additional information concerning the limits for three and two pump operation will be provided by August 1, 1975.

2. Potential Boron Precipitation

The requested information was provided by Mr. A. C. Thies' letters of April 16, 1975 and May 30, 1975 in response to Mr. Purple's letter of March 14, 1975.

3. Single Failure Analysis

A single failure analysis for manually-controlled, electrically-operated ECCS valves has been performed and is provided as Attachment 3 hereto. Valves 1CF-1, 2CF-1 and 3CF-1, and 1CF-2, 2CF-2 and 3CF-2, core flood tank discharge isolation valves, identified in Attachment 3 are ECCS valves which are currently required by Technical Specifications to have power disconnected during operation - see Technical Specification 3.3.3(c). Based on the information provided in Attachment 3, it is concluded that no station modifications or changes to the Technical Specifications are necessary in order to protect against a single failure of a manually-controlled, electrically-operated ECCS valve.

4. Submerged Valves

A review of equipment arrangement to determine if any valve motors within the Reactor Building will become submerged following a LOCA has been performed and those valves which may be affected are identified in Attachment 4. As can be seen, flooding of the valve motors identified would have no effect on short term or long term ECCS functions, or on containment isolation.

5. Containment Pressure

The containment pressure used to evaluate the performance capability of the ECCS has been calculated in accordance with the methods described in BAW-10104 and the results thereof are presented in BAW-10103.

Also, as requested in the staff's Safety Evaluation Report which accompanied the Commission's December 27, 1974 Order, and in accordance with Mr. Purple's letter of February 10, 1975 to Mr. A. C. Thies, as-built passive containment heat-sink data have been compiled and are given in Attachment 5.

Timely approval of the attached proposed Technical Specifications is requested. In the interim, in accordance with the Commission's December 27, 1974 Order for Modification of License, operation of the Oconee units is continuing within the limits of:

(a) The requirements of the Interim Acceptance Criteria, the Technical Specifications, and license conditions imposed by the Commission in accordance with the requirements of the Interim Acceptance Criteria, and

(b) The limits of the proposed Technical Specifications submitted by the licensee on September 20, 1974 and August 5, 1974, as modified by the further restrictions set forth in Appendix A to the Order.

Forty copies of this letter and attachments are enclosed.

Very truly yours,

William O. Parker, Jr.

DCH:vr

Enclosures