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## DUKE POWER COMPANY P.O. BOX 33189 CHARLOTTE, N.G. 28242

HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

TELEPHONE (704) 373-4531

November 15, 1989

U. S. Nuclear Regulatory Commission Document Control Desk Washington, DC 20555

Subject: Oconee Nuclear Station

Docket Nos. 50-269, -270, -287

P/T Limit and LTOP

Proposed Technical Specifications

## Gentlemen:

By letter dated January 31, 1989, I submitted the response to Generic Letter (GL) 88-11 for Oconee Nuclear Station (ONS). Within this letter, I committed to provide a Technical Specification amendment request including:

- 1) Revised 15 EFPY Pressure/Temperature (P/T) limits using the methodology of Regulatory Guide (RG) 1.99, Rev. 2.
- 2) Revised Low Temperature Overpressure Protection (LTOP) system operability requirements.

As such, pursuant to 10CFR50, Part 50.90, please find attached (Attachment 1) a proposed amendment to the ONS Facility Operating Licenses and revisions to the ONS Technical Specification which address P/T limits, LTOP, and supporting administrative changes.

With regard to revised P/T curves, an evaluation of the reactor vessel inside surface end-of-life RT NDT based on implementation of RG 1.99 Rev. 2 in 10CFR50.61 has been performed. Results of this evaluation indicate that Oconee Units 1, 2, and 3 reactor pressure vessels will remain below the 10CFR50.61 pressurized thermal shock screening criteria if the NRC were to implement RG 1.99 Rev. 2 in 10CFR50.61.

With regard to the LTOP system, a review of existing Technical Specification requirements and the corresponding NRC SER (Amendment Nos. 156/156/153) identified conflicts regarding inadvertent actuation of the High Pressure Injection System. These conflicts have been identified as an unresolved item (URI 50-269, -270, -287/88-34-04). Changes included within this amendment request correct these conflicts and assure that the reactor vessel is protected.

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I have determined the attached proposed amendment as having no significant hazards considerations. Attachment 4 provides the No Significant Hazards Consideration Evaluation. Attachment 2 provides the supporting Technical Justification for changes to 15 EFPY P/T limits. Attachment 3 provides Technical Justification for LTOP system operability. I am forwarding a copy of this application to the South Carolina Department of Health and Environmental Control for review and, as appropriate, subsequent consultation with the staff.

Very truly yours,

Hal B. Tucker

PJN/70/td

cc: S. D. Ebneter, Regional Administrator U. S. Nuclear Regulatory Commission 101 Marietta Street, NW, Suite 2900 Atlanta, Georgia 30323

> L. A. Wiens Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, DC 20555

P. H. Skinner NRC Resident Inspector Oconee Nuclear Station

Heyward Shealy Bureau of Radiological Health South Carolina Department of Health and Environmental Control 2600 Bull Street Columbia, SC 29201 Document Control Sk November 15, 1989 Page 3

Hal B. Tucker, 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 revision to the Oconee Nuclear Station License Nos. 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.

Hal B. Tucker, Vice President

S. Fess Cer

Subscribed and sworn to before me this 15th day of November, 1989

My Commission Expires:

May 7, 1994

