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FACIL:50-287	Oconee Nuclear Station, Unit 3, Duke Power Co	1
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DENTON, H.R.	Office of Nuclear Reactor Regulation, Director	
REID, R.W.	Operating Reactors Branch 3	

SUBJECT: Application to amend license changing Tech Specs, Sections 3.5 re operational & axial power shaping rods position limits & operational power imbalance limits & adding Tech Spec 3.5,2,9 re operation beyond normal design cycle length.

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NOTES:M Cunningham:all amends to FSAR & changes to Tech Specs. 05000287 AEOD/Ornstein:1cc

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WILLIAM O. PARKER, JR. VICE PRESIDENT STEAM PRODUCTION

December 22, 1980

Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Attention: Mr. R. W. Reid, Chief

Subject: Oconee Nuclear Station, Unit 3 Docket No. 50-287

Dear Mr. Denton:

My letter of August 25, 1980 submitted proposed changes to the Oconee Nuclear Station (ONS) Technical Specifications to support the operation of Oconee Unit 3 at full rated power during Cycle 6. Since that time, Babcock and Wilcox has agreed with the Nuclear Regulatory Commission to apply an early-in-life reduction in the LOCA kw/ft limits on reload analyses performed using the code TAFY. This agreement was provided as an interim action to resolve concerns about the use of TAFY for fuel and ECCS analyses until the code TACO-2 has been approved for use. References 1 and 2 document the submittal of the interim LOCA kw/ft limits to the NRC and the confirmation of the agreement for use of these limits.

Attached please find proposed changes to the ONS Technical Specifications which revise certain portions of the August 25 submittal as a result of this agreement between B&W and the NRC. Specifically, the attached changes address operational rod position limits, APSR position limits, and the operational power imbalance limits for the period of 0 to 50 (+10, -0) EFPD. The limits which were previously submitted for the period of 0 to 200 EFPD are still valid for the revised period of 50 to 200 EFPD. You are hereby requested to replace the appropriate pages of the August 25 submittal with the attached proposed changes.

In addition to the above, a new Technical Specification (3.5.2.9) is attached for your review and approval, also as a supplement to the August 25 submittal. This proposed specification would allow

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operation beyond the nominal design cycle length using the approved operational limit curves on the condition that the validity of these curves beyond the design cycle length is confirmed. In the past, as discussed in my letter of December 17, 1980, the Staff has changed the title blocks on the operational limit curves to reflect the design cycle length as the limit for curve validity, rather than allowing the as-submitted and open-ended title of "After 200 \pm 10 EFPD." However, Specification 3.5.2.9 would eliminate the need for the Staff to change the title blocks on the operational limit curves since it would automatically limit the length of cycle for which the curves are valid. At the same time, though, the proposed specification would allow the flexibility of operating beyond the design cycle length, if necessary and appropriate, without requiring a technical specification change, while ensuring that the operational limit curves are evaluated for extended operation and either confirmed to be valid or revised.

These proposed revisions to the ONS Technical Specifications supplement the submittal of August 25, 1980. The expected date for initial criticality of Cycle 6 for Unit 3 is February 10, 1981. Therefore, it is hereby requested that the Staff provide their approval of the proposed Technical Specification revisions no later than February 6, 1981, in order to prevent any delay in the Unit 3 startup.

Inasmuch as the applicable licensing fees were provided with the August 25 submittal, no additional fees are enclosed.

truly yours, Tarke William O. Parker, Jr.

FTP:vr Attachment

References: 1. B&W letter dated September 5, 1980, J. H. Taylor to L. S. Rubenstein

> NRC letter dated October 28, 1980, L. S. Rubenstein to J. H. Taylor