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FROM: Duke Power Company Charlotte, NC Mr Thies	DATE OF DOC 2-28-75	DATE REC'D 3-7-75	LTR XXXX	TWX	RPT	OTHER
TO: Mr Giambusso	ORIG 3 signed	CC	OTHER	SENT AEC PDR <u>XX</u>		SENT LOCAL PDR <u>XX</u>

CLASS	UNCLASS XXXXXX	PROP INFO	INPUT XX	NO CYS REC'D 3	DOCKET NO: <u>50-269</u> /70/287
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DESCRIPTION: Ltr notarized 3-7-75....trans the following:

ENCLOSURES: Amdt to OL/Change to Tech Specs: Consisting of revision to Appendix A of the Tech Specs ....with regard to tech review & control & independent review and audit.....

PLANT NAME: Oconee 1-3

FOR ACTION/INFORMATION 3-10-75 ehf

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<u>TO L.A. SHEPPARD</u>			1 - AGMED (RUTH GUSSMAN) Rm B-127 GT
			1 - J. D. RUNKLES, Rm E-201 GT

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DUKE POWER COMPANY

POWER BUILDING

422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28201

A. C. THIES

SENIOR VICE PRESIDENT  
PRODUCTION AND TRANSMISSION

P. O. Box 2178

February 28, 1975

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



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

Dear Mr. Giambusso:

Pursuant to 10CFR50.90, please find attached a proposed amendment to the Oconee Nuclear Station Technical Specifications, Appendix A to Facility Operating Licenses DPR-38, -47, and -55. This proposed amendment is submitted in response to Mr. Robert A. Purple's letter of December 18, 1974. As per Mr. Purple's letter the revisions included in the attached are concerned with two major topics: Technical review and control and independent review and audit.

With regard to technical review and control (see proposed Technical Specification 6.1.2), the current Oconee Technical Specifications and the standard technical specifications forwarded by Mr. Purple's letter establish an on-site review committee. The attached does not establish an on-site review committee, rather, controls have been identified which, when implemented, will be more effective than use of such a committee. These proposed changes in the area of technical review and control are based on significant experience at Oconee, from which it has been determined that for control of technical matters, such as procedures and changes thereto, proposed tests and experiments, proposed Technical Specification changes and proposed modifications, that better results can be obtained by use of a comprehensive second-party verification, rather than by a committee review. For other matters normally within the purview of an on-site review committee, such as incident investigation, performance of special reviews, review of the station security program and review of the station emergency plan, it has been determined that these can best be accomplished by use of the normal organizational structure or, as necessary, by ad hoc groups.

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2583

Mr. Angelo Giambusso

Page 2

February 28, 1975

It should also be noted that the standard technical specifications assign to the on-site review committee the responsibility for "review of facility operations to detect potential safety hazards." This item is not included in the attached as it is felt that the on-site operating organization, as part of the normal duties of station supervisory personnel, should provide timely and continuing monitoring of operating activities, including detection of specific potential safety hazards, to verify that such activities are conducted safely. These monitoring activities are properly considered to be an integral part of the routine supervisory function. The overview of station activities to detect significant, generic potential safety hazards cannot be performed by personnel intimately involved in day-to-day operating activities, i.e., station personnel, but rather must be and is performed by the independent review group.

With regard to independent review and audit, the attached adopts the standard technical specifications. The Nuclear Safety Review Unit described, however, while being in agreement with the standard technical specifications, does represent a change from the presently established Nuclear Safety Review Committee as it is felt that the effective performance of the responsibilities placed upon the independent review and audit group by the attached dictates use of an organizational unit rather than a standing committee. Upon approval and issuance of the attached by the Commission, it is Duke's intent to establish the Nuclear Safety Review Unit as specified and to staff the Unit with several full-time personnel. Other personnel within the Company will be designated, as required, to participate in the Unit on a part-time basis. Also consultants will be utilized, as deemed necessary.

Very truly yours,



A. C. Thies

ACT:vr

Mr. Angelo Giambusso  
Page 3  
February 28, 1975

A. C. THIES, being duly sworn, states that he is Senior Vice President of Duke Power Company; that he is authorized on the part of said Company to sign and file with the Atomic Energy 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.

A. C. Thies  
A. C. Thies, Senior Vice President

ATTEST:

John C. Goodman, Jr.  
John C. Goodman, Jr.  
Assistant Secretary

Subscribed and sworn to before me this 28th day of February, 1975.

Edna B. James  
Notary Public

My Commission Expires:

October 24, 1977