NRC STRIBUTION FOR PART 50 DOCK MATERIAL (TEMPORARY FORM)

.

CONTROL NO: 5426

FILE:\_\_\_

FROM:	Duke Power	Company	DATE OF DOC	DATE REC'D 5-16-75		LTR	TWX	RPT	OTHER
	A C Thies	NC	5-9-75						
TO:	a o mico	*	ORIG	CC	OTHER	SE	INT AE	CPDR_	XX
Mr Giambusso		880	, 3 signed			SENT LOCAL PDR XX			
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## RL\_ULATORY DOCKET FLE COPY

## DUKE POWER COMPANY

POWER BUILDING

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

A C THIES SENIOR VICE PRESIDENT PROJUCTION AND TRANSMISSION

May 9, 1975

P. O. Box 2178





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

Dear Mr. Giambusso:

In response to the March 31, 1975 letter from Mr. Karl R. Goller, Duke Power Company submits the following proposed Technical Specification changes for the Oconee Nuclear Station.

The proposed revisions apply to Specifications 3.1.3.5, 3.5.2.3, and 3.5.2.5. The revision to Specification 3.1.3 5 incorporates an additional restriction on the regulating control rod positions prior to criticality to assure that the ejected rod worth does not exceed the 1.0% Ak/k limit at hot zero power. The revision to Specification 3.5.2.3 deletes the specification on inserted control rod worths but at the same time specifies the manner in which the inserted control rod worths are to be maintained within acceptable limits. Finally, the revision to Specification 3.5.2.5 modifies the rod withdrawal limits for Oconee Units 2 and 3 after the control rod interchange.

The present specification on control rod withdrawal limits is intended to address only the LOCA-limited power peaking criterion. The shutdown margin and ejected rod worth criteria are independently specified by Specifications 3.5.2.1 and 3.5.2.3, respectively, and must be met in addition to the rod withdrawal limit specifications. Therefore, the present specifications are adequate, when used in conjunction with each other, as intended, to assure safe operation. However, in order to provide for a more direct application of the Technical Specifications, revised rod withdrawal limits have been proposed which will assure, by use of the rod withdrawal limits alone, compliance with the three subject criteria (LOCA-limited power peaking, shutdown margin, and ejected rod worth). In the case of Oconee 1, the current specification on the rod withdrawal limit continues to be adequate, since the ejected rod worth is predicted to be less than 1.0% Ak/k following the rod interchange,

Mr. Angelo Giambusso Page 2 May 9, 1975

for the rod withdrawal limits specified. (An analysis of the Oconee 1, Cycle 2 ejected rod worth has been submitted to the NRC in a letter of April 14, 1975, from Mr. A. C. Thies to Mr. Norman C. Moseley, with a copy sent to Mr. Angelo Giambusso.) For Oconee 2 and 3, revised rod withdrawal limits have been proposed since the hot zero power ejected rod worths after the control rod interchange have been predicted to exceed  $1\% \Delta k/k$  for certain control positions allowed by the present Specification 3.5.2.5.

The proposed revision makes the specification on ejected rod worth redundant in that the rod position limits will now assure that the worth of a single inserted rod will not exceed the values verified to be acceptable in the safety analysis of the hypothetical rod ejection accident. It should be noted that Technical Specification 3.5.2.5c on rod position limits allows the rod position limits to be exceeded for a period of up to two hours on the basis that the LOCA has a very low probability of occurrence. We consider the probability of the rod ejection accident to be the same order as that of the LOCA; therefore, the same flexibility in the rod position limits should be allowed for the ejected rod worth criterion.

Attached are replacement pages 3.1-8, 3.1-9, 3.5-7, 3.5-8, 3.5-10, 3.5-11, 3.5-14, 3.5-14a, 3.5-15, 3.5-16, 3.5-16a, 3.5-17, 3.5-19, and 3.5-20 of the Oconee Nuclear Station Technical Specifications. The revisions are identified by vertical lines in the margin of the replacement pages.

To enable implementation of this revision prior to the Oconee Units 2 and 3 control rod interchange, it is requested that approval for this proposed revision be given as soon as possible.

Very truly yours,

A. C. Thies

ACT:vr Attachments Mr. Angelo Giambusso Page 3 May 9, 1975

A. C. THIES, being duly sworn, states that he is Senior Vice Fresident 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.

allues

A. C. Thies, Senior Vice President

ATTEST: ordna. ohn C. Goodman

Assistant Secretary

Subscribed and sworn to before me this 9th day of May, 1975.

Educa B. Farmer Notary Public

My Commission Expires:

letaber 24 1977