### **EXHIBIT C**

# **TECHNICAL SPECIFICATION CHANGES**

# APPLICATION FOR RENEWED OPERATING LICENSES

for

OCONEE NUCLEAR STATION, UNITS 1, 2, AND 3

#### INTRODUCTION

As the current operating license holder for Oconee Nuclear Station (Oconee), Duke Energy Corporation (Duke) has prepared an Application for Renewed Operating Licenses for Oconee, Units 1, 2, and 3 (Application). The complete application includes sufficient information for the NRC to complete their technical and environmental reviews and to make the findings required by §54.29.

Exhibit C of the Application contains the information required by §54.22 [Footnote 1].

#### §54.22 Contents of application - technical specifications

Each application must include any technical specification changes or additions necessary to manage the effects of aging during the period of extended operation as part of the renewal application. The justification for changes or additions to the technical specifications must be contained in the license renewal application.

In late 1997, Oconee submitted a proposed license amendment to convert from the custom technical specifications, under which Oconee operated since initial licensing, to the Improved Technical Specifications (ITS) [Footnote 2]. NRC review of this proposed license amendment is in progress as of the date of the submittal of the Application. As it is full expected that NRC approval of this proposed license amendment will occur in the near future, the version of technical specifications considered in this review for license renewal is the version that was submitted in October 1997.

Exhibit A of the Application contains the technical information required by §54.21(a) and (c). Chapter 4 of Exhibit A provides descriptions of the programs and activities that manage the effects of aging for the period of extended operation and Chapter 5 of Exhibit A contains the evaluations of the time-limited aging analyses for the period of extended operation.

<sup>1.</sup> Exhibit A of the Application contains the technical information for license renewal, as required by \$54.21(a) and (c), Exhibit B contains the information required by \$54.21(d), and Exhibit D contains the Environmental Information, as required by \$54.23.

W. R. McCollum, Jr. (Duke) letter dated October 28, 1997 to Document Control Desk (NRC), Oconee Nuclear Station, Conversion to the Improved Technical Specifications, Docket Nos. 50-269, -270, and -287.

Based on a review of the information provided in Chapters 4 and 5 of Exhibit A and the October 1997 version of the Oconee ITS, only one change to the Oconee ITS has been identified that may need to be made. Currently Oconee ITS 5.5.6 refers Regulatory Guide 1.35, Revision 3, 1989 as the basis for the required tendon surveillance program. ITS SR 3.6.1.3 requires the verification of containment structural integrity in accordance with ITS 5.5.6.

The *Oconee Integrated Plant Assessment* for Containment credits the inservice inspection requirements of ASME Section XI, Subsections IWE and IWL (See Exhibit A, Sections 2.3, 3.3, and Chapter 4). However, because Oconee and all other nuclear power plants are required by regulation to fully implement these requirements by September 9, 2001 [Footnote 3]. Duke anticipates that generic regulatory guidance will be provided in the near future that will permit changes to the Oconee ITS to be made before this date in order to eliminate conflicting regulatory requirements. This change is expected to occur well before the period of extended operation which would be authorized by renewed operating licenses for Oconee Nuclear Station.

No other potential changes to the version of the Oconee ITS submitted in October 1997 were identified.