

W. R. McCollum, Jr. Vice President

Duke Energy

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February 22, 2001

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

Subject:

Oconee Nuclear Station
Docket 50-269, -270, -287

Selected Licensee Commitments Manual (SLC)

Gentlemen:

Pursuant to 10CFR 50.4 and 50.71, please find attached 7 copies of the latest revisions to the Oconee Selected Licensee Commitments Manual (SLC). The SLC Manual is Chapter 16.0 of the Oconee Updated Final Safety Analysis Report (UFSAR). This manual is intended to contain commitments and other station issues that warrant higher control, but are not appropriate for inclusion into the Technical Specifications (TS). Instead of being updated with the annual UFSAR Update, the SLC Manual will be updated as necessary throughout the year.

Very truly yours,

W. R. McCollum, Jr. Vice President

Oconee Nuclear Station

CMB/cmb Attachment

xc:

Luis A. Reyes

Regional Administrator, Region II

D. E. LaBarge, ONRR

M. C. Shannon

Oconee Senior Resident Inspector

A053

February 22, 2001

To: Manual Holders

Subject: Oconee Selected Licensee Commitments Manual (SLC)
Revision

On February 15, 2001, Station Management approved a revision to SLC 16.6.12, which was implemented on February 15, 2001. This change revised Additional High Pressure Injection (HPI) Requirements to include compensatory actions associated with the operable but degraded/non-conforming condition documented in PIP 01-0157.

Likewise, on February 15, 2001, Station Management approved a revision to SLC 16.8.4, which was implemented on February 15, 2001. This change revised the figures of SLC 16.8.4, Keowee Operational Restrictions, to increase the Keowee Unit 1, Unit 2 and dual Unit operating envelopes in terms of recommended start-up lake levels.

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Any questions concerning these revisions may be directed to Reene Gambrell, at ext. 3364.

Regulatory Compliance By: Conice Breazeale Regulatory Compliance

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16.15.3-5	3/27/99

16.6 ENGINEERED SAFETY FEATURES

16.6.12 Additional High Pressure Injection (HPI) Requirements

COMMITMENT:

The HPI System shall be OPERABLE with:

a. Two HPI trains OPERABLEb. Three HPI pumps OPERABLE

c. Two HPI discharge crossover valves OPERABLE

APPLICABILITY:

MODES 1 and 2,

MODE 3 with Reactor Coolant System (RCS) temperature

> 350°F.

ACTIONS

-	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One HPI pump inoperable OR One or more HPI discharge crossover valve(s) inoperable.	A.1	Reduce THERMAL POWER to ≤ 50% RTP	84 hours
В.	One HPI train inoperable	B.1	Only required when inoperable HPI train is incapable of automatic actuation and incapable of actuation through remote manual alignment. Reduce THERMAL POWER to ≤ 50% RTP.	3 hours

SURVEILLANCE REQUIREMENTS

	FREQUENCY	
SR 16.6.12.1	Perform CHANNEL CHECK for each HPI discharge crossover valve flow instrument.	31 days
SR 16.6.12.2	Perform CHANNEL CALIBRATION for each HPI discharge crossover valve flow instrument.	18 months

BASES

BACKGROUND

Technical Specification 3.5.2 requires that if one HPI pump OR one or more HPI discharge crossover valve(s) are inoperable, then the unit must reduce its thermal power level to at least 75% in effectively 84 hours. Additionally Technical Specification 3.5.2 requires that if one HPI train is inoperable, then the unit must reduce its thermal power level to at least 75% in 3 hours. PIP 01-00157 identified that the required thermal power level of 75% with respect to the described conditions of TS 3.5.2 may be non-conservative. As documented within PIP 01-00157, the concerns associated with TS 3.5.2 were deemed to create an operable but nonconforming / degraded condition. As a part of the operability within PIP 01-00157, compensatory actions were deemed necessary to constrain the requirements of TS 3.5.2 described above to a thermal power level of at least 50%. Thus, this selective licensee commitment requires that the thermal power level be reduced to at least 50% if one HPI pump OR one or more HPI discharge crossover valve(s) are inoperable in 84 hours. Likewise, this selective licensee commitment requires that the thermal power level be reduced to at least 50% if one HPI train is inoperable in 3 hours. Both of these additional power level constraints are compensatory actions associated with the operability evaluation contained within PIP 01-00157. For details concerning the operable but degraded / non-conforming condition reference should be made to PIP 01-00157.

APPLICABILITY

The SLC is applicable when the provisions of ITS 3.5.2 are applicable.

SURVEILLANCE REQUIREMENTS

SR 16.6.12.1 and SR 16.6.12.2

This SLC specifies Surveillance Requirements for the flow instruments associated with the HPI discharge crossover valves. SLC SR 16.6.12.1 and SR 16.6.12.2 require a CHANNEL CHECK and CHANNEL CALIBRATION be performed for these flow instruments at a Frequency of 31 days and 18 months, respectively. If one or both of these SRs is not met, the associated HPI discharge crossover valve (i.e., HP-409 or HP-410) must be declared inoperable, because the Bases for Technical Specification 3.5.2 requires that the associated flow instrument be OPERABLE to support the valve's OPERABILITY.

References

- Letter from D. E. LaBarge (NRC) to W. R. McCollum (Duke), NRC Safety Evaluation 1. Report on the Oconee High Pressure Injection System, dated September 6, 2000.
- UFSAR Sections 5.4.7.2, 6.3.1, 6.3.2.2.1, and 9.3.2, and Chapter 15. 2.
- ITS 3.5.2. 3.
- PIP 01-0157, Operability Evaluation related to PSC 2-00, Delayed Reactor Coolant 4. Pump Trip for Core Flood Line Break.

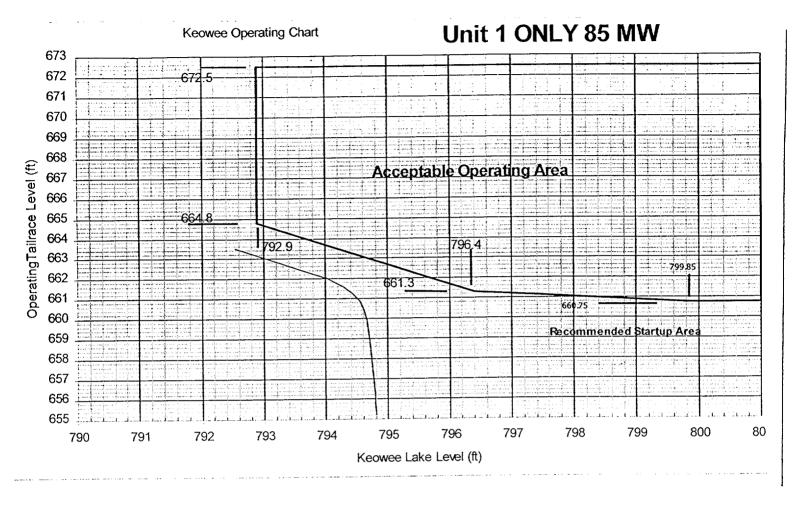


Figure 16.8.4-1 Keowee Operational Restrictions

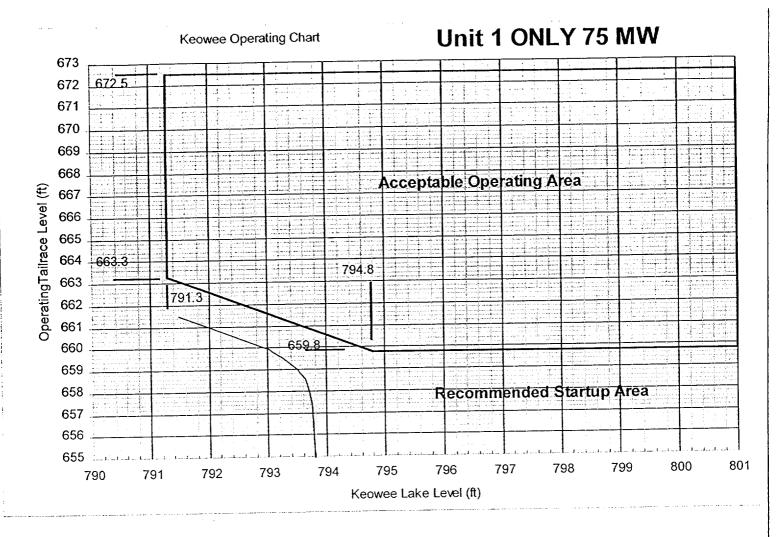


Figure 16.8.4-2 Keowee Operational Restrictions

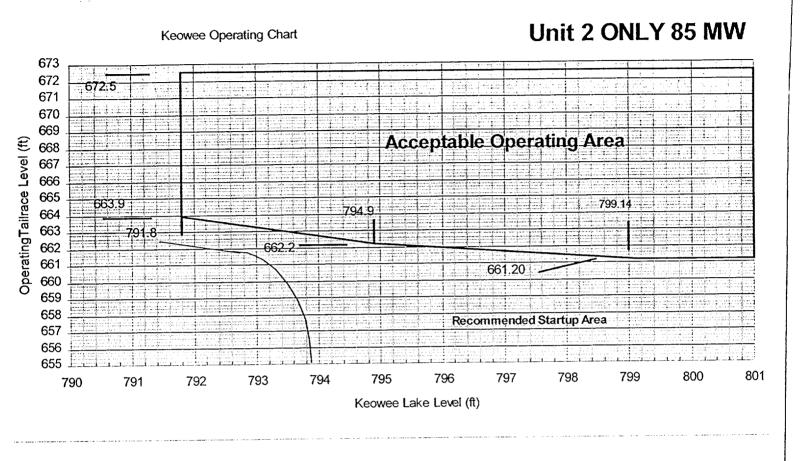


Figure 16.8.4-3 Keowee Operational Restrictions

16.8.4-4

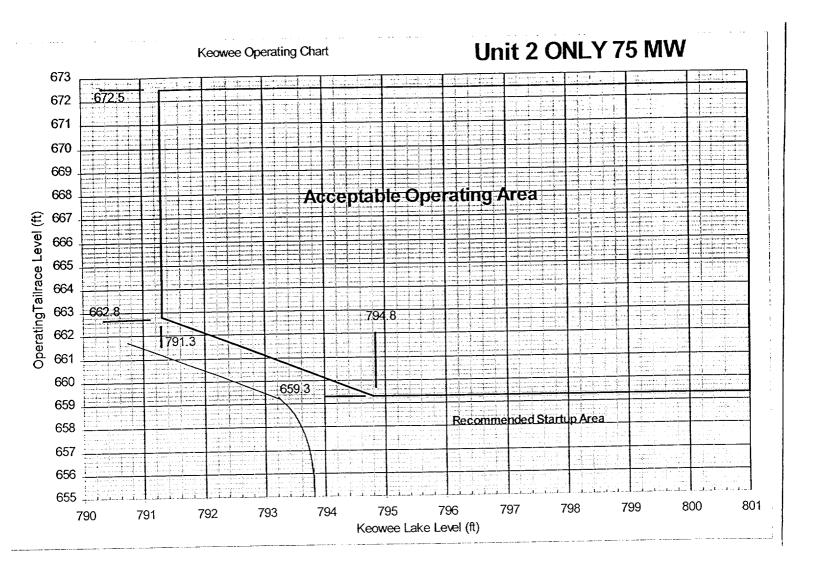


Figure 16.8.4-4 Keowee Operational Restrictions

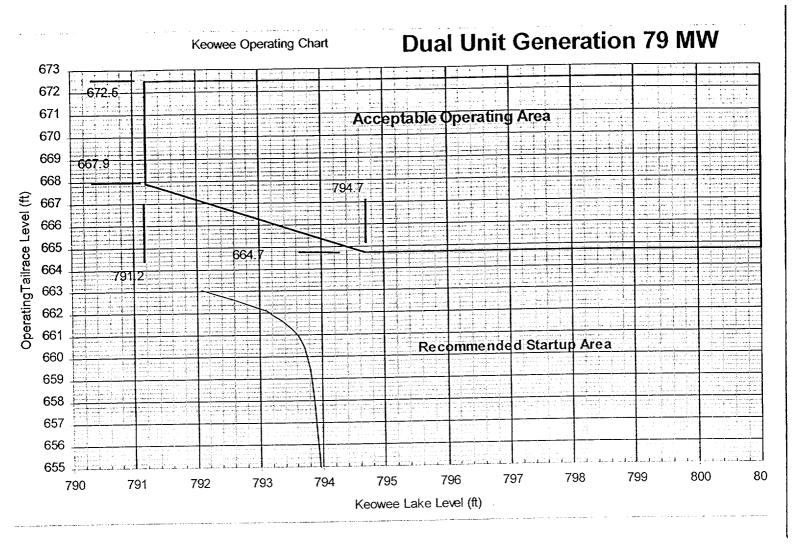


Figure 16.8.4-5 Keowee Operational Restrictions

16.8.4-6

BACKGROUND

Portions of this SLC are relocated from CTS 3.7.1 TS Note 3.

During periods of commercial power generation, the OPERABILITY of the Keowee Hydro units shall be based on lake levels and the power level of the Keowee Hydro units. The Keowee Hydro operating restrictions for commercial power generation shall be contained in the ONS Selected Licensee Commitment manual.

This SLC is used to determine Keowee Hydro unit OPERABILITY as an Oconee Emergency Power source when Keowee is generating to the commercial grid. It specifies the range of acceptable Keowee lake and tailrace elevations for various Keowee power generation levels. The acceptable region of the operating restrictions was determined by reference 1.

Figure 16.8.4-1 specifies the maximum operating limits of Keowee Hydro unit 1. This refers to occasions when Keowee unit 1 is operating and Keowee unit 2 is not operating. This figure allows for operation of Keowee Hydro unit 1 at a maximum of 85MW. Also, any operation of Keowee Hydro unit 1 below 85MW is allowed in accordance with this figure. Figure 16.8.4-2 allows for operation of Keowee unit 1 at a maximum of 75 MW. Also, any operation of Keowee Hydro unit 1 below 75 MW is allowed in accordance with this figure.

Figure 16.8.4-3 is applicable only for single unit operation of Keowee unit 2. This refers to occasions when Keowee unit 2 is operating and Keowee unit 1 is not operating. This figure allows for operation of Keowee Hydro unit 2 at a maximum of 85 MW. Also, any operation of Keowee Hydro unit 2 below 85 MW is allowed in accordance with this figure. Figure 16.8.4-4 allows for operation of Keowee unit 2 at a maximum of 75 MW. Also, any operation of Keowee Hydro unit 2 below 75 MW is allowed in accordance with this figure.

Figure 16.8.4-5 applies to simultaneous commercial generation with both Keowee units. In Figure 16.8.4-5, commercial generation is allowed up to a maximum of 79MW.

The lake levels on the operating charts are operating lake levels. Therefore, verification that the operation of the Keowee Hydro units is within the acceptable region of the charts will have to be performed during operation of the Keowee Hydro units.

Each figure has a recommended start-up area. This gives the Operator guidance on forebay and tailrace levels from which an idle Keowee unit can be started with assurance that the Acceptable Operating Area will be attained when the unit is generating. An engineering evaluation must be made prior to starting the Keowee Units when forebay and tailrace levels are outside the recommended start-up range.

APPLICABLE SAFETY ANALYSIS

The Keowee Hydro units provide emergency power for Oconee Nuclear Station on the appropriate emergency power path. The OPERABILITY of the Keowee Hydro units is required

to ensure the OPERABILITY and the capability of the Emergency Power System. Nuclear Station Modification (NSM) ON-52966 installed Frequency protection and revised the runaway governor protection logic circuits which ensure the OPERABILITY of the Keowee Hydro units during periods of commercial generation. This SLC will ensure that the Keowee Hydro units are operated within the acceptable limits.

APPLICABILITY

During periods of commercial power generation, the Keowee Hydro units are required to be within the acceptable regions of the operating restrictions when one or more Oconee Nuclear units are in MODES 1, 2, 3 or 4.

ACTIONS

The OPERABILITY of the Keowee Hydro units during periods of commercial generation is ensured when the Keowee Hydro units operate within the acceptable region of Figures 16.8.4-1, 16.8.4-2, 16.8.4-3, 16.8.4-4, and 16.8.4-5.

<u>A.1</u>

If the Keowee Hydro units are determined to be outside the limits of the acceptable region, action will be taken to restore commercial generation of the Keowee Hydro units to within the limits of the acceptable region. In addition, the applicable ITS Condition shall be entered since the Keowee Hydro unit may not be able to perform its design function. Once the commercial operation of the Keowee Hydro unit(s) is restored to within the limits of the acceptable region, the ITS Condition shall be exited. It is not necessary to perform an OPERABILITY test of Keowee Hydro units prior to exiting the Condition as long as no maintenance is performed on the units in order to return them to an acceptable operating region.

SURVEILLANCE REQUIREMENTS

SR 16.8.4.1

This surveillance will ensure that the operating conditions are within the limits of the acceptable region of the operating restrictions in Figures 16.8.4-1, 16.8.4-2, 16.8.4-3, 16.8.4-4, and 16.8.4-5 during commercial generation by the Keowee Hydro units. Since the lake levels in Figures 16.8.4-1, 16.8.4-2, 16.8.4-3, 16.8.4-4, and 16.8.4-5 are operating lake levels, verification that the operation of the Keowee Hydro units is within the acceptable regions will be performed during operation of the Keowee Hydro units.

REFERENCES:

- 1. Calculation KC-UNIT1-2-0106
- 2. 04/19/95 letter from J. W. Hampton to the NRC, "Response to NRC Questions on the Proposed Emergency Power Modification Action Plan."
- 3. 03/15/95 letter from J. W. Hampton to the NRC, "Proposed Emergency Power Modification Action Plan."
- 4. 08/15/95 letter from the NRC to J. W. Hampton, "Issuance of Amendments."
- 5. 03/20/97 Safety Evaluation Report from the NRC to add OPERABILITY requirements and surveillances to the Technical Specifications.