



**Duke Energy**

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W. R. McCollum, Jr.  
Vice President

March 29, 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

AD53

March 29, 2001

To: Manual Holders

Subject: Oconee Selected Licensee Commitments Manual (SLC)  
Revision

On March 27, 2001, Station Management approved a revision to SLC 16.9.7, which was implemented on March 27, 2001. The change revised this SLC, Keowee Lake Level, to allow Unit operation at a lake level of 791 feet and to identify important components whose operability is dependent on Lake Level. The revision also places administrative controls on HPSW pump alignment for Units 1 and 2 at lake levels below 793 feet.

Remove these pages

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SLC Page 16.9.7-2  
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Insert these pages

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Any questions concerning these revisions may be directed to Jim Weast at ext. 4841.

Regulatory Compliance  
By: Conice Breazeale  
Regulatory Compliance

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## 16.9 AUXILIARY SYSTEMS

### 16.9.7 Keowee Lake Level

- COMMITMENT
- a. Maintain lake level  $\geq$  793 ft to prevent additional administrative controls on HPSW Pump Alignment.
  - b. Maintain lake level  $\geq$  791 ft to assure that the "A" HPSW Pump shall be OPERABLE.
  - c. Maintain lake level  $\geq$  791 ft to assure that the LPSW Pumps shall be OPERABLE.
  - d. Maintain lake level  $\geq$  790 ft to assure that the Chiller Condenser Service Water Pumps shall be OPERABLE.
  - e. Maintain lake level  $\geq$  789 ft to assure that the "B" HPSW Pump shall be OPERABLE.
  - f. Maintain lake level  $\geq$  787 ft to prevent additional administrative controls on the Radwaste Equipment Cooling alignment.
  - g. Maintain lake level  $\geq$  786 ft to assure that the ECCW System shall be OPERABLE.
  - h. Maintain lake level  $\geq$  783 ft to assure that the Keowee Oil Storage Room Water Spray System shall be OPERABLE.
  - i. Maintain lake level  $\geq$  780 ft to assure that adequate water supply shall be available for 7 days of Keowee emergency operation.
  - j. Maintain lake level  $\geq$  780 ft to assure that the Keowee Step-up Transformer Mulsifyre System shall be OPERABLE.

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#### NOTES

- 1. Commitments a, c, f, and g do not apply when defueled.
  - 2. Commitment d applies only in MODE 1, 2, 3, and 4.
  - 3. Commitment j does not apply in MODE 5, 6, or defueled when the Keowee Step-up Transformer is not required to be OPERABLE.
- 

APPLICABILITY: At all times

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. Keowee Lake Level &lt; 793 ft.</p> <p><u>AND</u></p> <p>“A” HPSW Pump running or switch in BASE.</p>	<p>A.1 Verify all Required Unit 1 and 2 LPSW pumps OPERABLE.</p> <p><u>AND</u></p> <p>A.2.1 Restore Keowee Lake Level to <math>\geq</math> 793 ft.</p> <p><u>OR</u></p> <p>A.2.2 Place “A” HPSW Pump switch in OFF or STANDBY.</p>	<p>Immediately</p> <p>72 hours</p> <p>72 hours</p>
<p>B. Keowee Lake Level &lt; 793 ft.</p> <p><u>AND</u></p> <p>“A” HPSW Pump capable of auto-starting on low EWST level.</p> <p><u>AND</u></p> <p>“B” HPSW Pump inoperable, switch OFF or switch in STANDBY.</p>	<p>B.1 Verify all Required Unit 1 and 2 LPSW pumps OPERABLE.</p> <p><u>AND</u></p> <p>B.2.1 Restore Keowee Lake Level to <math>\geq</math> 793 ft.</p> <p><u>OR</u></p> <p>B.2.2 Place “A” HPSW Pump switch in OFF.</p> <p><u>OR</u></p> <p>B.2.3 Restore “B” HPSW Pump to OPERABLE status with switch in BASE.</p>	<p>Immediately</p> <p>72 hours</p> <p>72 hours</p> <p>72 hours</p>

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Keowee Lake Level < 791 ft.	C.1 Declare 'A' HPSW pump inoperable.  <u>AND</u>  C.2 Verify all Required LPSW pumps OPERABLE.  <u>AND</u>  C.3 Restore Keowee Lake Level to $\geq$ 791 ft.	Immediately        Immediately        72 hours
D. Keowee Lake Level < 790 ft.	D.1 Declare both WC trains inoperable.	Immediately
E. Keowee Lake Level < 789 ft.	E.1 Declare 'B' HPSW pump inoperable.	Immediately
F. Keowee Lake Level < 787 ft.	F.1 Declare all ECCW Headers aligned to Radwaste Equipment Cooling inoperable.	Immediately
G. Keowee Lake Level < 786 ft.	G.1 Declare all ECCW Siphon Headers inoperable.	Immediately
H. Keowee Lake Level < 783 ft.	H.1 Declare the Keowee Oil Storage Room Water Spray System inoperable.	Immediately

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
I. Keowee Lake Level < 780 ft.	I.1 Declare Keowee Step-up transformer Mulsifyre inoperable.	Immediately
	<u>AND</u>	
	I.2 Cease commercial power generation using KHUs.	Immediately
	<u>AND</u>	
	I.3 Notify the Plant Operations Review Committee (PORC) per NSD-308 and request plant operation (and reportability) guidance.	Immediately
J. Required Action and associated Completion Time not met for Condition A, B or C.	J.1 Declare all required LPSW pumps inoperable on applicable unit(s).	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 16.9.7.1 Verify Keowee lake level is within limits.	12 hours

BASES:

Instrument error must be added to the absolute lake levels in this SLC if using a computer point to verify level (Ref. 1). Absolute lake level can be determined at the Keowee Hydro intake structure.

HPSW System Commitments:

With lake level below 793 ft, additional administrative controls are placed on HPSW pump alignment to prevent adversely affecting LPSW pump NPSH (ref. 2). The worst case configuration for LPSW pump NPSH is the simultaneous operation of the "A" LPSW Pump, "B" LPSW Pump, and "A" HPSW Pump and a postulated single failure of the "C" LPSW Pump. This configuration is worst case because all operating pumps take suction from a common 36" supply header. At lake levels below 793 ft, adequate LPSW pump NPSH is maintained if the "B" HPSW pump is the first HPSW pump to start on low EWST level. With the "B" HPSW Pump switch in BASE, the pump starts at an EWST level of approximately 70,000 gallons. With the "A" HPSW Pump switch in STANDBY, the pump starts at an EWST level of approximately 60,000 gallons.

With lake level below 793 ft and the "A" HPSW pump running or its switch in Base, Unit 1 and 2 are in a condition where the LPSW System is vulnerable to single failure. In this condition, all required Unit 1 and 2 LPSW pumps shall be verified OPERABLE immediately to ensure adequate LPSW pump NPSH. Lake Level must be restored to  $\geq$  793 ft within 72 hours (Required Action A.2.1) or the "A" HPSW Pump switch shall be placed in OFF or STANDBY within 72 hours (Required Action A.2.2). The applicable Condition of SLC 16.9.1 (Ref. 13) must also be entered.

With lake level below 793 ft, the "A" HPSW pump capable of auto-starting on low EWST level, and the "B" HPSW pump inoperable, switch OFF, or switch in STANDBY; Unit 1 and 2 are in a condition where the LPSW System is vulnerable to single failure. In this condition, all required Unit 1 and 2 LPSW pumps shall be verified OPERABLE immediately to ensure adequate LPSW pump NPSH. Lake level must be restored to  $\geq$  793 ft within 72 hours (Required Action B.2.1), or the "A" HPSW Pump switch shall be placed in OFF within 72 hours (Required Action B.2.2), or the "B" HPSW pump restored to OPERABLE status with switch in BASE within 72 hours (Required Action B.2.3). The applicable Condition of SLC 16.9.1 (Ref. 13) must also be entered.

If the Required Actions and associated Completion Times of Condition A or B are not met, all required LPSW pumps must be declared inoperable immediately.

With lake level below 791 ft, the "A" HPSW Pump must be declared inoperable and the applicable Condition of SLC 16.9.1 (Ref. 13) entered because the pump has inadequate NPSH during ECCW siphon flow mode. With lake level below 789 ft, the "B" HPSW Pump must be declared inoperable and the applicable Condition of SLC 16.9.1 (Ref. 13) entered because the pump has inadequate NPSH during ECCW siphon flow mode (Ref. 3).

LPSW System Commitments:

With lake level below 791 ft, the LPSW pumps could experience inadequate NPSH during ECCW siphon flow mode if a single failure causes the loss of one required LPSW pump. The lake level limit also accounts for a postulated pipe break at a normally open seismic boundary valve. For Unit 1 and 2, the NPSH analysis (Ref. 2, 9) assumes the "A" HPSW Pump is in STANDBY and the "B" HPSW Pump is in BASE. For Unit 3, the analysis (Ref. 2, 9) assumes one HPSW pump is in operation. If all required LPSW pumps are available, adequate NPSH is available. Thus the Unit 1&2 and Unit 3 LPSW System are unable to withstand a single failure at lake levels below 791 ft. In this Condition, all required LPSW pumps shall be verified OPERABLE immediately to ensure adequate LPSW pump NPSH. Required Action C.3 requires lake level be restored to  $\geq$  791 ft within 72 hours. If the Required Actions and associated Completion Times of Condition C are not met, all required LPSW pumps must be declared inoperable immediately.

WC System Commitments:

With lake level below 790 ft, the Chiller Condenser Service Water Pumps (CCSWPs) may be adversely affected because the potential exists for air to de-entrain during ECCW siphon flow mode (Ref. 4). Since the CCSWPs support the Chilled Water (WC) System, both WC trains must be declared inoperable.

ECCW System Commitments:

With lake level below 787 ft, all ECCW Siphon Headers aligned to the Radwaste Equipment Cooling System must be declared inoperable immediately due to potential air inleakage from non-seismic piping during ECCW siphon flow mode. Seismic boundary valves CCW-319 and CCW-320 shall be closed to maintain operability of the ECCW Siphon Headers (Ref. 5, 9).

With lake level below 786 ft, all ECCW Siphon Headers must be declared inoperable immediately because the ECCW test acceptance criteria would be invalid (Ref. 6).

Keowee Oil Storage Room Commitment:

Should lake level fall below 783 ft, the Keowee Oil Storage Room water spray system may not provide the required flow rates because the system is dependent on lake level for driving head. For this reason, the spray system must be declared inoperable (Ref. 7).

Keowee Hydro Station Commitment:

With lake level below 780 ft, the water supply (for Keowee Hydro Station to provide emergency power to the overhead path at 46.5 MVA and the underground path at 22.35 MVA) could be inadequate for 7 days of continuous operation at these levels. Neither Keowee Hydro or Oconee Nuclear Station should be considered inoperable at this lake level. Keowee Hydro should not generate to the grid at lake levels below 780 ft in order to ensure ample water capacity for emergency power operation (Ref. 8).

Keowee Main Start-up Transformer Commitment:

Should lake level fall below 780 ft, the Keowee main Step up Transformer Mulsifyre system may not provide the required flow rates because the system is dependent upon lake level for driving head. For this reason, the Mulsifyre should be declared inoperable (Ref. 7).

REFERENCES:

1. OSC-5325, Rev. 2, Keowee Lake Level Uncertainty Calculation.
2. OSC-2280, Rev. 13, LPSW NPSH and Minimum Required Lake Level.
3. OSC-6176, Rev. 1, HPSW Pump NPSHa.
4. OSC-6550, Rev. 3, Hydraulic Model of Condenser Service Water for Chillers A and B.
5. OSC-5304, Rev. 2, Minimum Lake Level for Radwaste Equipment Cooling (EC) System Isolation.
6. OSC-6961, Rev. 2, ECCW Siphon Air Inleakage Model, ESV System Performance Model and Test Acceptance Criteria.
7. OSC-2895, Rev. 4, Hydraulic Calculations for Keowee Deluge Systems.
8. OSC-3528, Rev. 3, Keowee Lake Level Minimum Administrative Limits
9. OSC-6081, Rev. 4, CCW Seismic-LOOP Response.
10. ITS 3.7.7, Low Pressure Service Water (LPSW) System, Amendment Nos. 300, 300, & 300.
11. ITS 3.7.8, Emergency Condenser Circulating Water (ECCW) System, Amendment Nos. 300, 300, & 300.
12. ITS 3.7.16, Control Room Area Cooling Systems (CRACS), Amendment Nos. 300, 300, & 300.
13. SLC 16.9.1, Fire Suppression Water Supply Systems, 11/30/00.