Duke Energy

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W. R. McCollum, Jr. Vice President June 27, 2001

U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Attention: Document Control Desk

Subject: Oconee Nuclear Station Docket Numbers 50-269, 270, and 287 Supplement to License Amendment Request for Low Pressure Service Water Auto-start Circuitry, new Technical Specifications 3.3.28 Technical Specification Change (TSC) Number 2001-01

Pursuant to Title 10, Code of Federal Regulations, Part 50, Section 90 (10 CFR 50.90), Duke Energy (Duke) proposes to amend Appendix A, Technical Specifications, for Facility Operating Licenses DPR-38, DPR-47 and DPR-55 for Oconee Nuclear Station, Units 1, 2, and 3. The license amendment request (LAR) provides a method for obtaining a Nuclear Regulatory Commission (NRC) review and approval of the proposed modification and Technical Specifications (TS) that will implement Low Pressure Service Water System (LPSW) Standby Pump Auto-start Circuitry. The LAR was submitted to the NRC on February 28, 2001.

Duke received additional questions related to the LAR on May 27, 2001. In a conference call on June 20, 2001, Duke discussed these questions with the staff. The questions were for clarification purposes; however, the staff requested that the answers to questions 7 and 8 be submitted in writing. Attachment 1 contains the responses to questions 7 and 8. U. S. Nuclear Regulatory Commission June 27, 2001 Page 2

If there are any questions regarding this submittal, please contact Reene' Gambrell at (864) 885-3364.

Very truly yours,

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cc: Mr. D. E. LaBarge, Project Manager Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Mail Stop 0-14 H25 Washington, D. C. 20555

> Mr. L. A. Reyes, Regional Administrator U. S. Nuclear Regulatory Commission - Region II Atlanta Federal Center 61 Forsyth St., SW, Suite 23T85 Atlanta, Georgia 30303

Mr. M. C. Shannon Senior Resident Inspector Oconee Nuclear Station

Mr. Virgil R. Autry, Director Division of Radioactive Waste Management Bureau of Land and Waste Management Department of Health & Environmental Control 2600 Bull Street Columbia, SC 29201 U. S. Nuclear Regulatory Commission June 27, 2001 Page 4

W. R. McCollum, Jr., being duly sworn, states that he is Vice President, Oconee Nuclear Site, Duke Energy Corporation, that he is authorized on the part of said Company to sign and file with the U. S. Nuclear Regulatory Commission this revision to the Renewed Facility Operating License Nos. DPR-38, DPR-47, DPR-55; and that all the statements and matters set forth herein are true and correct to the best of his knowledge.

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W. R. McCollum, Jr., Vice President Oconee Nuclear Site

Subscribed and sworn to before me this $\frac{2746}{2001}$ day of

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Notary Publi

My Commission Expires:

2/12/2003

ATTACHMENT 1

Response to Questions 7 and 8

ATTACHMENT 1 Responses to Questions 7 and 8

7. Why is the 7-day completion time appropriate for restoration of the Low Pressure Service Water (LPSW) Standby pump auto-start circuitry? Provide examples of similar systems and their completion times and details of diverse methods of mitigating LOOP/single-failure scenarios.

The 7-day completion time steps outside the typical format for Allowed Outage Time (AOT). The LPSW Standby pump auto-start circuitry is of a low safety significance as compared to other mitigation strategies. Diverse methods exist for mitigating a LOOP/Single Failure These methods include: a)Operator action to scenario. start standby LPSW pump to support operation of the High Pressure Injection (HPI) Pumps and Motor Driven Emergency Feedwater Pumps, or b)Credit High Pressure Service Water (HPSW) backup to HPI Pump Motor Coolers which automatically aligns upon loss of LPSW. In addition, the Turbine Driven Emergency Feedwater Pump must be credited along with its HPSW backup. HPSW backup to the TDEFWP must be manually aligned, or c)Credit the Standby Shutdown Facility (SSF). The SSF RC Makeup pump can provide RCS inventory control and the SSF ASW System can provide decay heat removal.

8. Typically channel functional testing is performed on a quarterly basis. Why is the 18-month frequency appropriate for the standby LPSW pump auto-start circuitry channel functional test? Can the channel functional test be performed at power?

The 18-month frequency is based on operating experience and consistency with the typical industry refueling cycle and is justified by demonstrated instrument reliability over an 18-month interval such that the instrument is not adversely affected by drift. Testing on an 18-month frequency will also reduce the mechanical wear on LPSW pumps and associated equipment. The channel functional can be performed at power.