

August 7, 1998

Mr. William R. McCollum
Vice President, Oconee Site
Duke Energy Corporation
P. O. Box 1439
Seneca, SC 29679

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SUBJECT: ISSUANCE OF AMENDMENTS - OCONEE NUCLEAR STATION, UNITS 1, 2, AND 3 (TAC NOS. MA2234, MA2235, AND MA2236)

Dear Mr. McCollum:

The Nuclear Regulatory Commission has issued the enclosed Amendment Nos. 231, 231, and 228 to Facility Operating Licenses DPR-38, DPR-47, and DPR-55, respectively, for the Oconee Nuclear Station, Units 1, 2, and 3. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated July 8, 1998.

The amendments revise TS 4.5.4.1.b.1 for testing the Penetration Room Ventilation System air flow by adding a reference to the following statement that has been added to the bottom of the TS page: "A temporary noncompliance with this surveillance requirement is allowed until August 30, 1998, to complete necessary modifications to enable flow testing in accordance with ANSI N510-1975." This action supersedes the Notice of Enforcement Discretion that was issued by the staff on July 8, 1998.

A copy of the related Safety Evaluation is also enclosed. A Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

ORIGINAL SIGNED BY:

David E. LaBarge, Senior Project Manager
Project Directorate II-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-269, 50-270 and 50-287

Enclosures:

1. Amendment No. 231 to DPR-38
2. Amendment No. 231 to DPR-47
3. Amendment No. 228 to DPR-55
4. Safety Evaluation

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cc w/encl: See next page

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DATE	7/15/98	7/28/98	7/23/98	7/29/98	8/6/98	

for

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 7, 1998

Mr. William R. McCollum
Vice President, Oconee Site
Duke Energy Corporation
P. O. Box 1439
Seneca, SC 29679

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Sincerely,

A handwritten signature in black ink, appearing to read "David E. LaBarge".

David E. LaBarge, Senior Project Manager
Project Directorate II-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-269, 50-270, and 50-287

Enclosures:

1. Amendment No. 231 to DPR-38
2. Amendment No. 231 to DPR-47
3. Amendment No. 228 to DPR-55
4. Safety Evaluation

cc w/encl: See next page

Oconee Nuclear Station

cc:

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

DUKE ENERGY CORPORATION

DOCKET NO. 50-269

OCONEE NUCLEAR STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 231
License No. DPR-38

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment to the Oconee Nuclear Station, Unit 1 (the facility) Facility Operating License No. DPR-38 filed by the Duke Energy Corporation (the licensee) dated July 8, 1998, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations as set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is hereby amended by page changes to the Technical Specifications as indicated in the attachment to this license amendment, and Paragraph 3.B of Facility Operating License No. DPR-38 is hereby amended to read as follows:

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P PDR

B. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 231, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Herbert N. Berkow, Director
Project Directorate II-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Technical Specification
Changes

Date of Issuance: August 7, 1998



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

DUKE ENERGY CORPORATION

DOCKET NO. 50-270

OCONEE NUCLEAR STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 231
License No. DPR-47

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment to the Oconee Nuclear Station, Unit 2 (the facility) Facility Operating License No. DPR-47 filed by the Duke Energy Corporation (the licensee) dated July 8, 1998, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations as set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is hereby amended by page changes to the Technical Specifications as indicated in the attachment to this license amendment, and Paragraph 3.B of Facility Operating License No. DPR-47 is hereby amended to read as follows:

B. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 231, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in black ink, appearing to read 'H. Berkow for', is written over the typed name.

Herbert N. Berkow, Director
Project Directorate II-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Technical Specification
Changes

Date of Issuance: August 7, 1998



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

DUKE ENERGY CORPORATION

DOCKET NO. 50-287

OCONEE NUCLEAR STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 228
License No. DPR-55

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment to the Oconee Nuclear Station, Unit 3 (the facility) Facility Operating License No. DPR-55 filed by the Duke Energy Corporation (the licensee) dated July 8, 1998, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations as set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is hereby amended by page changes to the Technical Specifications as indicated in the attachment to this license amendment, and Paragraph 3.B of Facility Operating License No. DPR-55 is hereby amended to read as follows:

B. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 228 , are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Herbert N. Berkow, Director
Project Directorate II-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Technical Specification
Changes

Date of Issuance: August 7, 1998

ATTACHMENT TO LICENSE AMENDMENT NO. 231

FACILITY OPERATING LICENSE NO. DPR-38

DOCKET NO. 50-269

AND

TO LICENSE AMENDMENT NO. 231

FACILITY OPERATING LICENSE NO. DPR-47

DOCKET NO. 50-270

AND

TO LICENSE AMENDMENT NO. 228

FACILITY OPERATING LICENSE NO. DPR-55

DOCKET NO. 50-287

Replace the following page of the Appendix "A" Technical Specifications with the enclosed page. The revised page is identified by Amendment number and contains vertical lines indicating the areas of change.

Remove

4.5-7.

Insert

4.5-7

4.5.4 Penetration Room Ventilation System

Applicability

Applies to testing of the Penetration Room Ventilation System

Objective

To verify that the Penetration Room Ventilation System is operable.

Specification

4.5.4.1 Operational and Performance Testing

- a. Monthly, each train of the Penetration Room Ventilation System shall be operated for at least 15 minutes at design flow $\pm 10\%$.
- b. Every 18 months, it shall be demonstrated that:
 1. The Penetration Room Ventilation System fans operate at design flow ($\pm 10\%$) when tested in accordance with ANSI N510-1975. *
 2. The pressure drop across the combined HEPA filters and charcoal adsorber banks is less than six inches of water at the system design flow rate ($\pm 10\%$).
 3. Each branch of the Penetration Room Ventilation System is capable of automatic initiation.
 4. The bypass valve for filter cooling is manually operable.
- c. Leak tests using DOP or halogenated hydrocarbon, as appropriate shall be performed on the Penetration Room purge filters:
 1. Every 18 months;
 2. After each complete or partial replacement of a HEPA filter bank or charcoal adsorber bank;
 3. After any structural maintenance on the system housing;
 4. After painting, fire, or chemical release in any ventilation zone communicating with the system.
- d. The results of the DOP and halogenated hydrocarbon tests on HEPA filters and charcoal adsorber banks shall show $\geq 99\%$ DOP removal and $\geq 99\%$ halogenated hydrocarbon removal, respectively, when tested in accordance with ANSI N510-1975.

* A temporary noncompliance with this surveillance requirement is allowed until August 30, 1998, to complete necessary modifications to enable flow testing in accordance with ANSI N510-1975.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 231 TO FACILITY OPERATING LICENSE DPR-38

AMENDMENT NO. 231 TO FACILITY OPERATING LICENSE DPR-47

AND AMENDMENT NO. 228 TO FACILITY OPERATING LICENSE DPR-55

DUKE ENERGY CORPORATION

OCONEE NUCLEAR STATION, UNITS 1, 2, AND 3

DOCKET NOS. 50-269, 50-270, AND 50-287

1.0 INTRODUCTION

By letter dated July 8, 1998, Duke Energy Corporation (the licensee) submitted a request for changes to the Oconee Nuclear Station, Units 1, 2, and 3, Technical Specifications (TSs). The requested changes would revise TS 4.5.4.1.b.1 for testing the Penetration Room Ventilation System air flow by adding a reference to the following statement that would be added to the bottom of the TS page: "A temporary noncompliance with this surveillance requirement is allowed until August 30, 1998, to complete necessary modifications to enable flow testing in accordance with ANSI N510-1975." This temporary noncompliance would implement the Notice of Enforcement Discretion that was issued on July 8, 1998.

2.0 BACKGROUND

Oconee TS 4.5.4.1.b.1 requires that every 18 months the Penetration Room Ventilation System fans be demonstrated to operate at design flow (+/- 10 percent) when tested in accordance with ANSI Standard N510-1975. ANSI Standard N510-1975 requires that a pitot tube velocity-traverse method be used in accordance with Section 9 of the American Conference of Government Industrial Hygienists Industrial Ventilation requirements.

During a Safety System Engineering Inspection at Oconee for the Control Room Ventilation System (CRVS) and Penetration Room Ventilation System (PRVS), the NRC identified a potential violation that indicated the PRVS fans were not tested in accordance with ANSI Standard N510-1975 and, therefore, not in accordance with the TSs. This potential violation was included in Inspection Report Nos. 50-269/98-03, 50-270/98-03, and 50-287/98-03 dated May 4, 1998. The flow measurement method, which has been used since original construction, uses installed orifice plates to measure the air flow.

By letter dated June 4, 1998, the licensee denied the violation based on a belief that the use of the orifice plates met the requirements of the ANSI standard and the TSs. As part of the review of this issue, the licensee conducted flow measurement tests using a pitot tube array and attempted (unsuccessfully) to locate calibration data for the orifices. The licensee was unable to develop an alternate method to measure flow that was reliable. Because the calibration data could not be located, the accuracy of the instrumentation being used could not be verified.

By letter dated July 6, 1998, the NRC informed the licensee that its denial of the violation was rejected. Consequently, the licensee entered TS 3.0, which requires that all three units be in the hot shutdown condition within 12 hours, and requested that a Notice of Enforcement Discretion (NOED) be granted. The NOED was verbally approved on July 6, 1998, and the NOED approval letter was issued on July 8, 1998, which will be in effect until these amendments are processed.

3.0 EVALUATION

The PRVS is a Quality Assurance Condition 1 (QA-1) system that is required to filter reactor building leakage that enters the east and west penetration rooms. The PRVS consists of two trains for each of the Oconee units. Each train takes suction on the unit's penetration room, routes it through a particulate-absolute-charcoal filter, flow orifice, flow control valve, fan, to a common discharge pipe, and then out through the unit's exhaust stack.

The design flow rate of each fan is 1000 cubic feet per minute (cfm) (+/- 10 percent). System flow requirements are maintained to assure that a proper negative pressure can be maintained inside the penetration rooms and proper residence time exists for the air within the carbon filters. If the flow in the system is too low, the penetration room may not be maintained at a negative pressure with respect to the surrounding areas. If the flow in the system is too high, the carbon filter efficiency may be degraded below the TS requirements.

The PRVS fans are periodically tested by measuring system flow rate using permanently installed sharp-edged orifice plates and a gauge. However, as noted previously, this method does not comply with the ANSI standard referenced in TS 4.5.4.1.b.1.

For this application, ANSI Standard N510-1975, Section 8.3.1.3, states:

Make a pitot-tube velocity-traverse in accordance with Section 9 of ACGIH [American Conference of Government Industrial Hygienists] Industrial Ventilation. The traverse should be made at a point in the duct where airflow velocity is 1000 fpm or more, and, if possible, where velocity measurements can be made at least 7.5 duct diameters downstream of any airflow disturbance. If there is no place where the airflow is greater than 1000 fpm, use one of the other methods as described in Section 9 of the ACGIH Industrial Ventilation.

In order to perform the flow tests in accordance with the ANSI standard, modifications must be made to the PRVS piping to permit use of pitot tube measuring devices. This modification to all six trains (two trains/unit) of the PRVS will be completed by August 30, 1998, as stated in the proposed TS change.

In order to demonstrate operability, the licensee has performed an assessment of the capability of the PRVS to perform its intended safety function using the worst-case low and high flows that could exist in the PRVS based on existing surveillances and surveillance methodologies.

The licensee conducted a review of previous surveillance test results to ensure that the system is tested appropriately to meet the design requirement specified in TS 5.2.3 if a low flow condition existed. This TS requires that when the system is in operation, a slight negative

pressure be maintained in the penetration room to ensure inleakage. The test is performed on an 18-month frequency to verify that the PRVS can perform this safety function. Travel stops on the throttle valves assure that flow does not decrease below the tested flow value following the test, which prevents degradation of PRVS vacuum capability due to decreases in system flow rate. Another monthly test of travel stop positions is also performed. Results from the past two surveillances for each unit verify that the PRVS fans maintain an appropriate negative pressure in the penetration rooms. Administrative controls are also in place to ensure that the penetration room seal boundary is maintained.

The licensee also performed a review of the impact of low flow on the operability of the PRVS filters that focused on the need for sufficient cooling flow. Natural circulation on the outside of the carbon filter housing is sufficient to remove the heat generated by fission products to ensure that filter ignition will not occur. Therefore, low flows have no adverse impacts on the capability of the filters to perform their filtering function.

These tests are meant to show that, irrespective of the indicated flow, the PRVS can perform its intended safety function of maintaining a negative pressure in the penetration rooms.

If the flow in the system is too high, the carbon filter efficiency may be degraded below TS requirements. High flow rates must be bounded to assess operability of the carbon filters in the system. The licensee determines carbon filter efficiency by performing laboratory tests in accordance with ASME Standard D3803-1989 at a laboratory flow rate of 40 feet per minute, which corresponds to a PRVS flow rate of 1000 cfm. If actual flow rates in the PRVS are higher than 1000 cfm, the filter efficiency will be less than the results of the laboratory testing.

An inspection of two of the six PRVS orifice plates in 1991 provided assurance that dimensions of the orifice plate matched the vendor supplied documents. Specifically, the PRVS design is a 7.15-inch diameter orifice plate installed in a 12-inch diameter duct.

Equation 9.10 in Section 9.5.1 of the Industrial Ventilation Manual provides a correlation between orifice pressure drop and flow rate for a given orifice size. Using this correlation, the licensee verified that the pressure drop versus flow rate information used in the PRVS flow calibration procedure is correct for the orifice installed in the PRVS.

Industrial Ventilation Manual Section 9.5.1 states that an assumed error of ± 5 percent can be used for uncalibrated orifice plates installed in an adequate length of straight duct. However, the piping configuration for the PRVS does not meet these ideal conditions. The license has conservatively assumed an error of 50 percent in the orifice flow measurement to clearly bound the potential in situ effects on the accuracy of these flow measurement devices. Qualitative testing performed with a pitot tube array provides further assurance that this is a conservative assumption in that the array showed general agreement with the orifice plate readings within ± 20 percent.

Applying this 50 percent error to the TS limit of 1100 cfm, results in a maximum actual flow of 1650 cfm. The upper bound flow of 1650 cfm was used by the licensee to conservatively evaluate the impact on carbon filter efficiency. As a result of the analysis, the licensee determined that the carbon filter efficiency is 96 percent, which is well above the TS limit of

90 percent. Since the PRVS is only briefly in service for testing each month, there is no significant degradation that could occur over the next 2 months prior to implementation of the modification that would result in the filter efficiency being reduced to below the TS limit of 90 percent.

High flows also have the potential to impact the structural integrity of the filters. A PRVS monthly test verifies that the pressure drop across the filters does not exceed 2.0 inches of water gauge (w.g.) for the High Efficiency Particulate Air filters and 1.2 inches w.g. for the carbon filters. This is well below the 6.0 inches w.g. limit for the combined differential pressure across both filters as required by TS 4.5.4.a.b.2. Therefore, the license has determined that there are no structural integrity concerns due to high flow in the PRVS.

The preceding evaluation is intended to demonstrate that the PRVS can perform its intended filtering function even assuming flow rates well in excess of the TS limit for the period prior to implementation of the design change.

The staff independently evaluated the safety consequences of allowing Oconee Units 1, 2, and 3 to continue operation in accordance with the limiting conditions for operation without being in compliance with TS Section 4.5.4.1.b.1. The staff recognizes that there is a small risk due to uncertainty of the fan flow rate, but unnecessary shutdown of the three Oconee units with associated undesirable transients would be averted. In addition, even though the accuracy of the orifice plate was not demonstrated, the orifice plate still provides indication of any adverse trends or degradation in fan flow rate. Thus, allowing the surveillance to be postponed until this problem is resolved by issuance of an exigent amendment to the TS and coming into full compliance with TS 4.5.4.1.b.1 is the option that would result in the minimum safety impact. The staff has reviewed the licensee's evaluation and determined that revising TS 4.5.4.1.b.1 to include a note to allow a temporary noncompliance with this surveillance requirement until August 30, 1998, in order to incorporate design modifications and complete flow testing in accordance with ANSI Standard N510-1975, does not adversely affect the ability of the PRVS to perform its intended safety function. Based on the analysis, reliance on the orifice plate measurement technique to determine the adequacy of the PRVS flow until the requirements of the ANSI standard can be met will provide adequate assurance of PRVS operability. As a result, it is concluded that the proposed amendments are acceptable.

4.0 EXIGENT CIRCUMSTANCES

The Commission's regulations, as stated in 10 CFR 50.91, contain provisions for issuance of amendments when the usual 30-day public notice period cannot be met. One type of special exception is an exigency. An exigency is a case where the Commission and licensee need to act promptly and that time does not permit the Commission to publish a Federal Register notice allowing 30 days for prior public comment, and it is determined that the amendments involve no significant hazards considerations.

Under such circumstances, the Commission notifies the public in one of two ways: by issuing a Federal Register notice providing an opportunity for hearing and allowing at least 2 weeks from the date of the notice for prior public comments, or by using the local media to provide

The licensee submitted its request for amendments on July 8, 1998, and requested that the amendments be issued on an exigent basis in accordance with the staff's policy for processing an NOED. The amendment request was noticed in the Federal Register on July 16, 1998 (63 FR 38433), at which time the staff proposed a no significant hazards consideration determination.

The need for the NOED resulted from a Safety System Engineering Inspection of the PRVS, when a potential violation was identified where the PRVS fans were not tested in accordance with the TSs because orifice plates were being used to measure the air flow rather than pitot tubes, the licensee's denial of the violation, and the rejection of the licensee's denial by the staff. Consequently, the licensee entered TS 3.0, which, absent the NOED, would require all three units be in the hot shutdown condition within 12 hours.

These amendments complete the review process and implement the proposed TS changes, pursuant to the NRC's policy regarding exercising discretion for an operating facility set out in Section VII.c of the "General Statement of Policy and Procedures for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600, for processing NOEDs. The staff has determined that compliance with the surveillance requirement for the PRVS is not possible with the present components and a modification to the system is needed in order to comply with the ANSI standard and TS requirements. As a result, failure to comply with the TSs would necessitate immediate shutdown of the three units. Therefore, and in light of the NOED, issuance of these amendments is needed in less than the 30-day comment period normally allowed for processing amendments to the TSs. In addition, the licensee used its best efforts to promptly request the proposed amendments after being notified of the rejection. Therefore, pursuant to 10 CFR 50.91(a)(6), the staff has determined that exigent circumstances exist and the amendments are being processed accordingly.

4.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission's regulations in 10 CFR 50.92, state that the Commission may make a final determination that license amendments involve no significant hazards consideration if operation of the facility, in accordance with the proposed amendments, would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

[This proposed change has been evaluated against the standards in 10 CFR 50.92 and has been determined to involve no significant hazards, in that operation of the facility in accordance with the proposed amendments would not:]

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated:

This proposed change does not increase the probability of an accident evaluated in the SAR [Safety Analysis Report] because:

This evaluation addresses the potential impact of revising Technical Specification 4.5.4.1.b.1 to include a note to allow a temporary noncompliance with this surveillance requirement until August 30, 1998, to complete the necessary modifications to enable flow testing in accordance with ANSI N510-1975.

As described in the technical justification (Attachment 3 [of the July 8, 1998, submittal]), the use of orifice plates in the Oconee Units 1, 2, and 3 Penetration Room Ventilation Systems (PRVSs) to measure the flow from the PRVS fans, in lieu of ANSI N510-1975 requirements, does not increase the probability of an accident evaluated in the SAR because this condition is not an accident initiator. There is no physical change to any plant structures, systems, or components (SSCs) or operating procedures. Neither electrical power systems, nor important to safety mechanical SSCs will be adversely affected. The PRVS has been evaluated as operable for normal and accident conditions. There are no shutdown margin, reactivity management, or fuel integrity concerns. There is no increase in accident initiation likelihood, therefore analyzed accident scenarios are not impacted.

This proposed change does not increase the probability of a malfunction of equipment important to safety evaluated in the SAR because:

As described in the technical justification, the use of orifice plates which are currently used in Oconee Units 1, 2, and 3 to measure the flow from the PRVS fans, in lieu of ANSI N510-1975 requirements, does not increase the probability of a malfunction of equipment important to safety. This activity does not physically change or modify any plant system, structure, or component. The PRVS is QA [quality assurance] condition 1 (QA-1) and is required to filter reactor building leakage which enters the East and West Penetration Rooms. This activity does not change any test procedures. Nothing is being done to inhibit the integrity or function of the PRVS. No valve manipulations, electrical alignments, or system configurations are required.

This change does not increase the consequences of an accident evaluated in the SAR because:

This activity will not adversely affect the ability to mitigate any SAR described accidents. The PRVS flow is within the system design limits as measured by the orifice plates. In addition, Duke [Duke Energy Corporation] has performed bounding analyses which demonstrate that the carbon filter efficiency is still within the Technical Specification limits at higher flow rates. Therefore, Oconee Units 1, 2, and 3 will meet system design requirements for the PRVS. There is no adverse impact on containment integrity, radiological release pathways, fuel design, filtration systems, main steam relief valve setpoints, or radwaste systems.

This change does not increase the consequences of a malfunction of equipment important to safety evaluated in the SAR because:

No safety related or important to safety equipment necessary to place or maintain the plant in safe shutdown condition will be impacted by allowing a temporary noncompliance with this surveillance requirement until August 30, 1998, to complete flow testing in accordance with ANSI N510-1975. As described in the technical justification, the use of orifice plates which are currently used in Oconee Units 1, 2, and 3 to measure the flow from the PRVS fans, in lieu of ANSI N510-1975 requirements, does not increase the consequences of a malfunction of equipment important to safety. The PRVS flow is within the system design limits as measured by the orifice plates. In addition, Duke has performed bounding analyses which demonstrate that the carbon filter efficiency is still within the Technical Specification limits at higher flow rates. Therefore, Oconee Units 1, 2, and 3 will meet system design requirements for the PRVS. There is no adverse impact on containment integrity, radiological release pathways, fuel design, filtration systems, main steam relief valve setpoints, or radwaste systems.

- (2) Create the possibility of a new or different kind of accident from any kind of accident previously evaluated:

This change does not create the possibility for an accident of a different type than any evaluated in the SAR because:

There is no increased risk of unit trip, or challenge to the Reactor Protection System (RPS) or other safety systems. There is no physical effect on the plant, i.e. none on Reactor Coolant System (RCS) temperature, boron concentration, control rod manipulations, core configuration changes, and no impact on nuclear instrumentation. There is no increased risk of a reactivity excursion. No new failure modes or credible accident scenarios are postulated from this activity.

This change does not create the possibility for a malfunction of a different type than any evaluated in the SAR because:

There is no physical change to the plant SSCs or operating procedures. This change does not involve any plant changes, electrical lineups, or valve manipulations. Analyses have been performed which demonstrate that the PRVS can perform its intended safety function relying on the orifice plates to measure flow. No new equipment or components were installed. No credible new failures are postulated.

- (3) Involve a significant reduction in a margin of safety.

This change does not involve a significant reduction in the margin of safety because:

No function of any important to safety SSC will be adversely affected or degraded as a result of continued operation. No safety parameters, setpoints, or

design limits are changed. There is no adverse impact to the nuclear fuel, cladding, RCS, or required containment systems.

Duke has concluded, based on the above, that there are no significant hazards considerations involved in this amendment request.

Based on the above considerations, the NRC staff concludes that the amendments meet the three criteria of 10 CFR 50.92. Therefore, the staff has made a final determination that the proposed amendments do not involve a significant hazards consideration.

5.0 STATE CONSULTATION

In accordance with the Commission's regulations, the South Carolina State official was notified of the proposed issuance of the amendments. The State official had no comments.

6.0 ENVIRONMENTAL CONSIDERATION

The amendments change surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has made a final finding that the amendments involve no significant hazards consideration. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

7.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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