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W. R. McCollum, Jr.
Vice President

December 17, 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
          Amendment 319/319/319

Please find attached Technical Specification Bases Pages
B 3.3.28-1, B 3.3.28-2, and B 3.3.28-3 which were included in
Amendment 319/319/319, dated September 6, 2001. This
amendment added new Technical Specification 3.3.28 and Bases
3.3.28 governing the addition of the low pressure service
water standby pump automatic start circuitry. Please note
that in our original submittal, the B was inadvertently
omitted from the page numbers on the above pages. This letter
is to correct the ommission.

If you have any questions, please call Reene Gambrell at 864-
885-3364.

Very truly yours,

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

A-001

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B 3.3 INSTRUMENTATION

B 3.3.28   Low Pressure Service Water (LPSW) Standby Pump Auto-Start Circuitry

BASES

BACKGROUND	The LPSW Standby Pump Auto-Start Circuitry starts the standby LPSW Pump to ensure LPSW cooling water is available if a running pump does not restart following a Loss Of Offsite Power (LOOP) event and LPSW header pressure does not return to normal values within a predetermined amount of time.

The LPSW Standby Pump Auto-Start Circuitry consists of two safety grade pressure switches, and associated relays, time delays, switches, and indicator lights. The circuitry utilizes a two-out-of-two logic configuration. The actuation of the auto-start circuitry requires a low LPSW header pressure signal from both pressure switches.

Descriptions of the LPSW and ECCW Systems are provided in the Bases for LCO 3.7.7, "Low Pressure Service Water (LPSW) System" and 3.7.8, "Emergency Condenser Circulating Water (ECCW)."

APPLICABLE SAFETY ANALYSES	In the analysis of LOOP events, the LPSW Standby Pump Auto-Start Circuitry is assumed to be OPERABLE to restart the standby LPSW Pump to ensure LPSW cooling water is available. For LOOP events, the LPSW System is required to support OPERABILITY of the SSW System, High Pressure Injection (HPI) Pump Motors, and Motor Driven Emergency Feedwater (MDEFW) motors. The SSW System is a support system to the Emergency Condenser Circulating Water (ECCW) System. The SSW System is required to ensure ECCW siphon header piping remains sufficiently primed to supply siphon flow to the LPSW pump suction piping.

The LPSW Standby Pump Auto-Start Circuitry satisfies Criterion 3 of 10 CFR 50.36 (Ref. 1).

BASES

LCO
LPSW Standby Pump auto-start circuitry shall be OPERABLE. The circuitry includes a sensor channel and a logic channel. The LCO is modified by a NOTE indicating that this circuitry is not required to be OPERABLE on LPSW Pumps that are running. This is acceptable because a running LPSW pump automatically restarts following a LOOP.

APPLICABILITY
LPSW Standby Pump auto-start circuitry is required to be OPERABLE in MODES 1, 2, 3, and 4 to ensure LPSW cooling water is available during a LOOP with a single failure of an LPSW pump.

Mitigation of applicable Design Basis Events in MODES 5 and 6 does not rely on the auto-start of the LPSW Standby Pump; therefore, the LPSW Standby Pump auto-start circuitry is not required to be OPERABLE.

ACTIONS
A.1

If the circuitry is inoperable, Required Action A.1 requires the LPSW Standby Pump Auto-Start circuit to be restored to OPERABLE status within 7 days.

The 7 day Completion Time is based upon the low safety significance of the auto-start circuitry.

If only one SSW header is in operation and the LPSW Standby Pump auto-start circuitry is inoperable on the same unit that is supplying the SSW header, the condition would be entered for all affected units. For example, if all three units are in MODE 1 and only the 'B' SSW header is in service and Unit 3 LPSW Standby Pump auto-start circuitry is inoperable, then all three units are in a 7 day action statement.

B.1 and B.2

Condition B applies when the Required Action and associated Completion Time of Condition A are not met. If Condition B applies, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed in at least MODE 3 within 12 hours, and in MODE 5 within 60 hours.

BASES

ACTIONS	B.1 and B.2 (continued)

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems. |

SURVEILLANCE REQUIREMENTS	SR 3.3.28.1

A CHANNEL FUNCTIONAL TEST is performed on each LPSW Pump to ensure the auto-start circuit will perform its intended function. The Frequency of 18 months is based on engineering judgment and operating experience. Testing on an 18 month interval provides reasonable assurance that the circuitry is available to perform its safety function.

SR 3.3.28.2

A CHANNEL CALIBRATION is performed to verify that the components respond to the measured parameter within the necessary range and accuracy. The CHANNEL CALIBRATION leaves the components adjusted to account for instrument drift to ensure that the auto-start circuitry remains operational between successive tests. The Frequency is justified by the assumption of an 18 month calibration interval in the determination of the drift in the setpoint analysis. |

REFERENCES	1.	10 CFR 50.36.