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July 11, 2002

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

Attention: Document Control Desk

Subject: Oconee Nuclear Station
Docket Numbers 50-269, 50-270, and 50-287
License Amendment Request for Oconee Technical
Specifications
Technical Specification Change (TSC) Number
2002-04

Pursuant to 10CFR50.90, Duke Energy Corporation (Duke) is hereby submitting a license amendment request (LAR) applicable to the Oconee Nuclear Station (ONS) Technical Specifications (TS). This LAR applies to these ONS TS:

3.3.6, Engineered Safeguards Protective System (ESPS)
Manual Initiation

3.3.8, Post Accident Monitoring (PAM) Instrumentation

3.3.18, Emergency Power Switching Logic (EPSL) Voltage
Sensing Circuits

3.4.11, Reactor Coolant System Specific Activity

3.4.14, Reactor Coolant System, Pressure Isolation
Valve (PIV) Leakage

3.8.1, AC Sources - Operating

3.8.2, AC Sources - Shutdown

3.8.4, DC Sources - Shutdown

3.10.1, Standby Shutdown Facility

5.5.17, Program and Manuals, Backup Method for
Determining Subcooling Margin

A001

The changes being proposed to these TS are administrative in nature and these changes are described in detail in the subsequent portions of this LAR submittal package. Conforming changes will also be made to the Bases and are included for information.

The contents of this LAR submittal package are:

Attachment 1 provides a marked copy of the existing ONS Units 1, 2 and 3 TS and Bases. These marked pages show the proposed changes.

Attachment 2 provides the reprinted ONS Units 1, 2, and 3 TS and Bases pages.

Attachment 3 provides a description of the proposed changes and Technical Justification for the proposed changes.

Pursuant to 10CFR50.92, Attachment 4 documents Duke's determination that this LAR contains No Significant Hazards Consideration.

Pursuant to 10CFR51.22(c)(9), Attachment 5 provides a basis for the categorical exclusion from performing an Environmental Assessment/Impact Statement.

Implementation of this LAR in the Facility Operating Licenses and TS will not impact the Oconee Updated Final Safety Analysis Report (UFSAR). In accordance with Duke administrative procedures and Quality Assurance Program Topical Report, the changes contained in this LAR have been reviewed and approved by the ONS Plant Operations Review Committee and the Nuclear Safety Review Board. Duke is requesting NRC review and approval of this LAR by January 31, 2003. Pursuant to 10CFR50.91, a copy of this LAR is being sent to the State of South Carolina Department of Health and Environmental Control for review, and as appropriate, consultation with the NRC staff. It has been determined that the NRC's standard 30-day implementation grace period will be adequate for this LAR. This submittal contains no additional regulatory commitments.

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Inquiries on this matter should be directed to Reese'
Gambrell at (864) 885-3364.

Very truly yours,

A handwritten signature in black ink, appearing to read 'W. R. McCollum, Jr.', written in a cursive style.

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

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cc: Mr. L. N. Olshan, Project Manager
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
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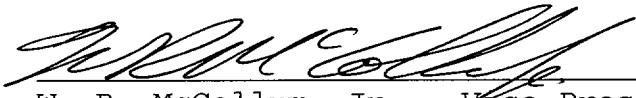
Mr. L. A. Reyes, Regional Administrator
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Atlanta Federal Center
61 Forsyth St., SW, Suite 23T85
Atlanta, Georgia 30303

Mr. M. C. Shannon
Senior Resident Inspector
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Mr. Virgil R. Autry, Director
Division of Radioactive Waste Management
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Department of Health & Environmental Control
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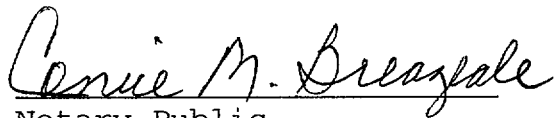
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W. R. McCollum, Jr., being duly sworn, states that he is Vice President, Oconee Nuclear Site, Duke Energy Corporation, that he is authorized on the part of said Company to sign and file with the U. S. Nuclear Regulatory Commission this revision to 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.



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

Subscribed and sworn to before me this 11th day of
July, 2002



Notary Public

My Commission Expires:

2/12/03

Attachment 1

Ocone Unit 1, 2, and 3 Technical Specifications and Bases

Marked Copy

3.3 INSTRUMENTATION

3.3.6 Engineered Safeguards Protective System (ESPS) Manual Initiation

LCO 3.3.6 Two manual initiation channels of each one of the ESPS Functions below shall be OPERABLE:

- a. High Pressure Injection, Reactor Building (RB) Non-Essential Isolation, Keowee Start, Load Shed and Standby Breaker Input, and Keowee Standby Bus Feeder Breaker Input (ES Channels 1 and 2);
- b. Low Pressure Injection and ~~RB Essential Isolation~~ (ES Channels 3 and 4);
- c. RB Cooling, RB Essential Isolation and Penetration Room Ventilation (ES Channels 5 and 6); and
- d. RB Spray (ES Channels 7 and 8).

APPLICABILITY: MODES 1 and 2,
MODES 3 and 4 when associated engineered safeguard equipment is required to be OPERABLE.

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more ESPS Functions with one channel inoperable.	A.1 Restore channel to OPERABLE status.	72 hours

(continued)

SURVEILLANCE REQUIREMENTS

NOTE

These SRs apply to each PAM instrumentation Function in Table 3.3.8-1 except where indicated.

SURVEILLANCE		FREQUENCY
SR 3.3.8.1	Perform CHANNEL CHECK for each required instrumentation channel that is normally energized.	31 days
SR 3.3.8.2	<p>NOTE</p> <p>Only applicable to PAM Functions 7, 10 and 22.</p> <p>Perform CHANNEL CALIBRATION.</p>	12 months
SR 3.3.8.3	<p>NOTE</p> <ol style="list-style-type: none"> 1. Neutron detectors are excluded from CHANNEL CALIBRATION. 2. Not applicable to PAM Functions 7, 10, and 22. <p>Perform CHANNEL CALIBRATION.</p>	18 months

3.3 INSTRUMENTATION

3.3.18 Emergency Power Switching Logic (EPSL) Voltage Sensing Circuits

LCO 3.3.18 Three channels of each of the following EPSL voltage sensing circuits shall be OPERABLE:

- a. Startup Transformer;
- b. Standby Bus 1;
- c. Standby Bus 2; and
- d. Auxiliary Transformer.

NOTE

1. If both N breakers are open, Auxiliary Transformer voltage sensing circuits are not required to be OPERABLE.
2. When not in MODES 1, 2, 3 and 4, only EPSL voltage sensing circuit(s) associated with required AC power source(s) are required to be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, 4, 5 and 6,
During movement of irradiated fuel assemblies.

ACTIONS

NOTE

Separate Condition entry is allowed for each circuit.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required circuits with one channel inoperable.	<p>A.1</p> <p>-----NOTE----- The Completion Time is reduced when in Condition L of LCO 3.8.1.</p> <p>Restore channel to OPERABLE status.</p>	24 hours

(continued)

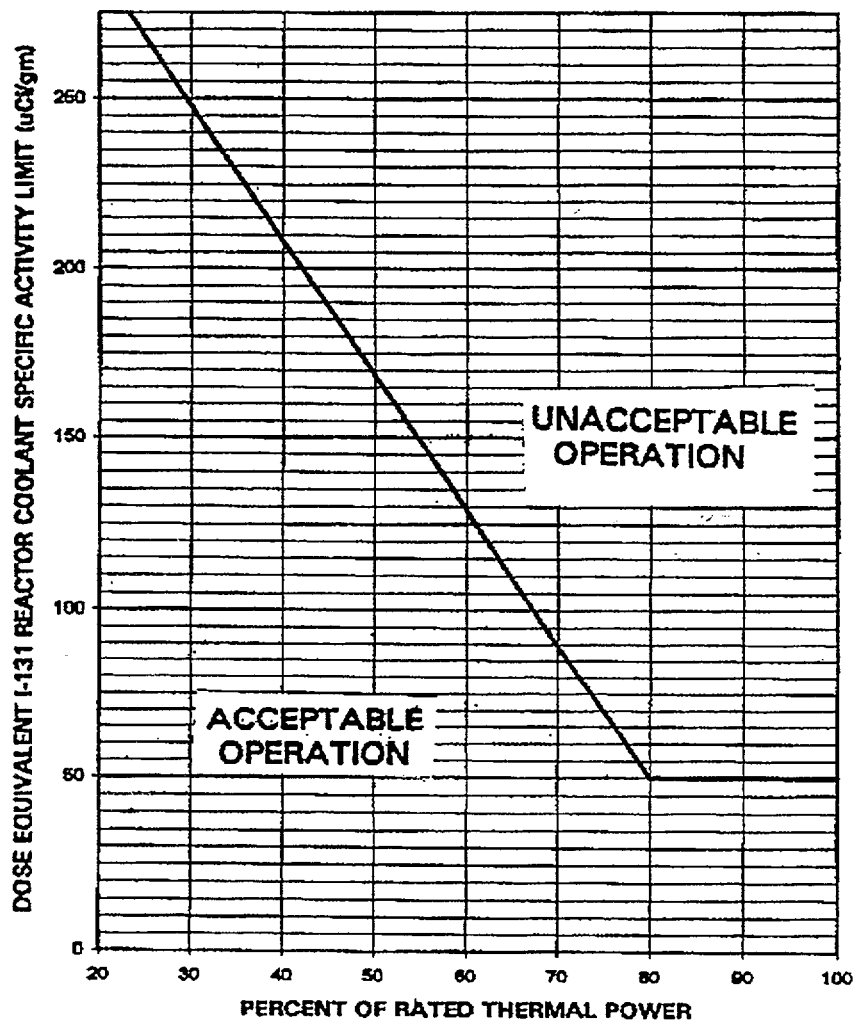


Figure 3.4.11-1 (page 1 of 1)
Reactor Coolant DOSE EQUIVALENT I-131 Specific Activity Limit
Versus Percent of RATED THERMAL POWER With Reactor Coolant
Specific Activity $> 1.0 \mu\text{Ci/gm}$ DOSE EQUIVALENT I-131

THERMAL

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.4.14.1</p> <p>-----NOTES-----</p> <p>Not required to be performed in MODES 3 and 4.</p> <p>-----</p> <p>Verify leakage from each required RCS PIV is equivalent to ≤ 0.5 gpm per nominal inch of valve size up to a maximum of 5 gpm at an RCS pressure ≥ 2150 psia and ≤ 2190 psia.</p>	<p>18 months</p> <p><u>AND</u></p> <p>Prior to entering MODE 2 whenever the unit has been in MODE 5 for ≥ 7 days, if leakage testing has not been performed in the previous 9 months.</p>

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.14 -----NOTES-----</p> <p>Not required to be performed for an SL breaker when its standby bus is energized from a LCT via an isolated power path.</p> <p>-----</p> <p>Verify each closed SL and closed N breaker opens on an actuation of each redundant trip coil.</p>	<p>18 months</p>
<p>SR 3.8.1.15 -----NOTE-----</p> <p>Redundant breaker trip coils shall be verified on a STAGGERED TEST BASIS.</p> <p>-----</p> <p>Verify each 230 kV switchyard circuit breaker actuates to the correct position on a switchyard isolation actuation signal.</p>	<p>18 months</p>
<p>SR 3.8.1.16 -----NOTE-----</p> <p>Only applicable when complying with Required Action C.2.2.4.</p> <p>-----</p> <p>Verify one KHU provides an alternate manual AC power source capability by manual or automatic KHU start with manual synchronize, or breaker closure, to energize its non-required emergency power path.</p>	<p>As specified by Required Action C.2.2.4</p>

3.8 ELECTRICAL POWER SYSTEMS

3.8.2 AC Sources – Shutdown

LCO 3.8.2 The following AC electrical power sources shall be OPERABLE:

- a. One source from the offsite transmission network to the onsite AC electrical power distribution system(s) required by LCO 3.8.9, "Distribution Systems – Shutdown". The offsite power source shall be an offsite circuit available or connected to one of the following:
 1. 230 kV switchyard to a unit startup transformer to one main feeder bus,
 2. 230 kV switchyard, or 525 kV switchyard for Unit 3, to the main step-up and unit auxiliary transformers to one main feeder bus, or
 3. Central switchyard to one main feeder bus.
- b. One emergency power source capable of supplying the onsite AC electrical power distribution system(s) required by LCO 3.8.9. The emergency power source shall include one of the following:
 1. One Keowee Hydro Unit (KHU) capable of providing power through the underground emergency power path to one main feeder bus,
 2. One KHU capable of providing power through the overhead emergency power path to one main feeder bus, or
 3. One LCT energizing one standby bus via an isolated power path to one main feeder bus.

NOTE

1. A unit startup transformer may be shared with a Unit in MODES 1 through 6.
2. The requirements of ITS 5.5.19, "Lee Combustion Turbine Testing Program," shall be met when a LCT is used for the emergency power requirements.
3. The required emergency power source and required offsite power source shall not be susceptible to a failure disabling both sources.

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.8.2.1</p> <p>NOTE</p> <ol style="list-style-type: none"> 1. SR requirements for both standby buses or both main feeder buses are reduced to one standby bus and one main feeder bus. 2. SR 3.8.1.4 requirement to energize the underground emergency power path is not applicable. <p>For AC sources required to be OPERABLE, the SRs of Specification 3.8.1, "AC Sources – Operating," except SR 3.8.1.7, SR 3.8.1.13, SR 3.8.1.14, SR 3.8.1.15 and SR 3.8.1.16, are applicable.</p>	<p>In accordance with applicable SRs</p>

3.8 ELECTRICAL POWER SYSTEMS

3.8.4 DC Sources – Shutdown

LCO 3.8.4 125 VDC Vital I&C power source(s) shall be OPERABLE to support the 125 VDC Vital I&C power panelboards(s) required by LCO 3.8.9, "Distribution Systems – Shutdown" and shall include at least one of the unit's 125 VDC Vital I&C power sources.

APPLICABILITY: MODES 5 and 6,
During movement of irradiated fuel assemblies.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required 125 VDC Vital I&C power sources inoperable.	A.1 Declare affected required feature(s) inoperable.	Immediately
	<u>OR</u>	
	A.2.1 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u>	
	A.2.2 Suspend movement of irradiated fuel assemblies.	Immediately
	<u>AND</u>	
	A.2.3 Initiate action to suspend operations involving positive reactivity additions.	Immediately
	<u>AND</u>	
		(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.10.1.11	Verify for required SSF battery that the cell to cell and terminal connections are clean, tight and coated with anti-corrosion material.	12 months
SR 3.10.1.12	Verify battery capacity of required battery is adequate to supply, and maintain in OPERABLE status, the required maximum loads for the design duty cycle when subjected to a battery service test.	12 months
SR 3.10.1.13	Perform CHANNEL CALIBRATION for each required SSF instrument channel.	18 months
SR 3.10.1.14	Verify OPERABILITY OF SSF valves in accordance with the Inservice Testing Program.	In accordance with the Inservice Testing Program
SR 3.10.1.15	<p>-----NOTES----- Not applicable to the SSF submersible pump. -----</p> <p>Verify the developed head of each required SSF pump at the flow test point is greater than or equal to the required developed head.</p>	In accordance with the Inservice Testing Program
SR 3.10.1.16	Verify the developed head of the SSF submersible pump at the flow test point is greater than or equal to the required developed head.	2 years

5.5 Programs and Manuals

5.5.16 Safety Function Determination Program (SFDP) (continued)

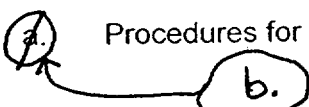
A loss of safety function exists when, assuming no concurrent single failure, a safety function assumed in the accident analysis cannot be performed. For the purpose of this program, a loss of safety function may exist when a support system is inoperable, and:

- a. A required system redundant to the system(s) supported by the inoperable support system is also inoperable; or
- b. A required system redundant to the system(s) in turn supported by the inoperable supported system is also inoperable; or
- c. A required system redundant to the support system(s) for the supported systems (a) and (b) above is also inoperable.

The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

5.5.17 Backup Method for Determining Subcooling Margin

This program ensures the capability to accurately monitor the Reactor Coolant System Subcooling Margin. The program shall include the following:

- a. Training of personnel, and
-  b. Procedures for monitoring.

5.5.18 KHU Commercial Power Generation Testing Program

The KHU Commercial Power Generation Testing Program shall include the following and shall be met during periods of KHU commercial power generation:

- a. Verify upon an actual or simulated actuation signal, each KHU's overhead tie breaker and underground tie breaker actuate to the correct position from an initial condition of commercial power generation every 18 months.
- b. Verify upon an actual or simulated actuation signal, each KHU's frequency is ≤ 66 Hz in ≤ 23 seconds from an initial condition of commercial power generation every 18 months.

BASES

APPLICABLE SAFETY ANALYSES (continued)

The ESPS manual initiation ensures that the control room operator can rapidly initiate ES Functions. The manual initiation trip Function is required as a backup to automatic trip functions and allows operators to initiate ESPS whenever any parameter is rapidly trending toward its trip setpoint.

The ESPS manual initiation functions satisfy Criterion 3 of 10 CFR 50.36 (Ref. 1).

LCO

Two ESPS manual initiation channels of each ESPS Function shall be OPERABLE whenever conditions exist that could require ES protection of the reactor or RB. Two OPERABLE channels ensure that no single random failure will prevent system level manual initiation of any ESPS Function. The ESPS manual initiation Function allows the operator to initiate protective action prior to automatic initiation or in the event the automatic initiation does not occur.

The required Function is provided by two associated channels as indicated in the following table:

Function	Associated Channels
HPI and RB Non-Essential Isolation, Keowee Emergency Start, Load Shed and Standby Breaker Input, and Keowee Standby Bus Feeder Breaker Input	1 & 2
LPI and RB Essential isolation	3 & 4
RB Cooling, RB Essential isolation, and Penetration Room Vent.	5 & 6
RB Spray	7 & 8

APPLICABILITY

The ESPS manual initiation Functions shall be OPERABLE in MODES 1 and 2, and in MODES 3 and 4 when the associated engineered safeguard equipment is required to be OPERABLE. The manual initiation channels are required because ES Functions are designed to provide protection in these MODES. ESPS initiates systems that are either reconfigured for decay heat removal operation or disabled while in MODES 5 and 6. Accidents in these MODES are slow to develop and would be mitigated by manual operation of individual components. Adequate time is available to evaluate unit conditions and to respond by manually operating the ES components, if required.

Attachment 2

Oconee Units 1, 2, and 3 Technical Specifications and Bases

Reprinted Pages

<u>Remove</u>	<u>Insert</u>
3.3.6-1	3.3.6-1
3.3.8-4	3.3.8-4
3.3.18-1	3.3.18-1
3.4.11-3	3.4.11-3
3.4.14-3	3.4.14-3
3.8.1-17	3.8.1-17
3.8.2-1	3.8.2-1
3.8.2-4	3.8.2-4
3.8.4-1	3.8.4-1
3.10.1-5	3.10.1-5
5.0-25	5.0-25
B3.3.6-2	B3.3.6-2

NOTE: Reprinted pages to be provided later by Oconee Regulatory Compliance.

3.3 INSTRUMENTATION

3.3.6 Engineered Safeguards Protective System (ESPS) Manual Initiation

LCO 3.3.6 Two manual initiation channels of each one of the ESPS Functions below shall be OPERABLE:

- a. High Pressure Injection, Reactor Building (RB) Non-Essential Isolation, Keowee Start, Load Shed and Standby Breaker Input, and Keowee Standby Bus Feeder Breaker Input (ES Channels 1 and 2);
- b. Low Pressure Injection (ES Channels 3 and 4);
- c. RB Cooling, RB Essential Isolation and Penetration Room Ventilation (ES Channels 5 and 6); and
- d. RB Spray (ES Channels 7 and 8).

APPLICABILITY: MODES 1 and 2,
MODES 3 and 4 when associated engineered safeguard equipment is required to be OPERABLE.

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more ESPS Functions with one channel inoperable.	A.1 Restore channel to OPERABLE status.	72 hours

(continued)

SURVEILLANCE REQUIREMENTS

NOTE

These SRs apply to each PAM instrumentation Function in Table 3.3.8-1 except where indicated.

SURVEILLANCE		FREQUENCY
SR 3.3.8.1	Perform CHANNEL CHECK for each required instrumentation channel that is normally energized.	31 days
SR 3.3.8.2	<p>NOTE</p> <p>Only applicable to PAM Functions 7, 10 and 22.</p> <p>Perform CHANNEL CALIBRATION.</p>	12 months
SR 3.3.8.3	<p>NOTES</p> <ol style="list-style-type: none"> Neutron detectors are excluded from CHANNEL CALIBRATION. Not applicable to PAM Functions 7,10, and 22. <p>Perform CHANNEL CALIBRATION.</p>	18 months

3.3 INSTRUMENTATION

3.3.18 Emergency Power Switching Logic (EPSL) Voltage Sensing Circuits

LCO 3.3.18 Three channels of each of the following EPSL voltage sensing circuits shall be OPERABLE:

- a. Startup Transformer;
- b. Standby Bus 1;
- c. Standby Bus 2; and
- d. Auxiliary Transformer.

-----NOTES-----

1. If both N breakers are open, Auxiliary Transformer voltage sensing circuits are not required to be OPERABLE.
2. When not in MODES 1, 2, 3 and 4, only EPSL voltage sensing circuit(s) associated with required AC power source(s) are required to be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, 4, 5 and 6,
During movement of irradiated fuel assemblies.

ACTIONS

-----NOTE-----

Separate Condition entry is allowed for each circuit.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required circuits with one channel inoperable.	<p>A.1 -----NOTE----- The Completion Time is reduced when in Condition L of LCO 3.8.1.</p> <p>Restore channel to OPERABLE status.</p>	24 hours

(continued)

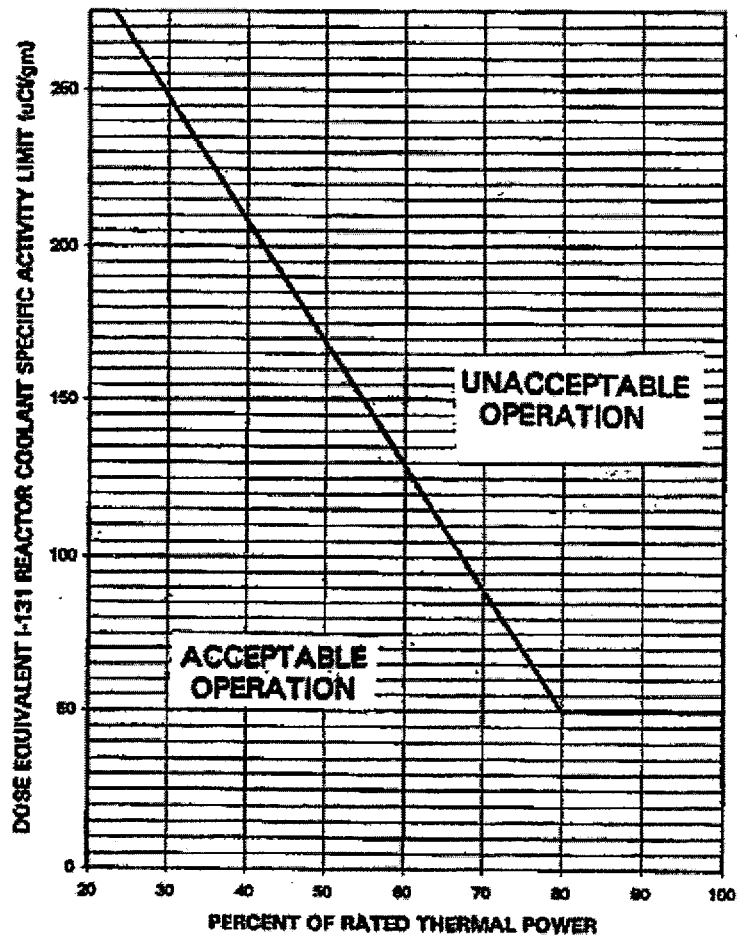


Figure 3.4.11-1 (page 1 of 1)
Reactor Coolant DOSE EQUIVALENT I-131 Specific Activity Limit
Versus Percent of RATED THERMAL POWER With Reactor Coolant
Specific Activity $> 1.0 \mu\text{Ci/gm}$ DOSE EQUIVALENT I-131

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.4.14.1 -----NOTE----- Not required to be performed in MODES 3 and 4. -----</p> <p>Verify leakage from each required RCS PIV is equivalent to ≤ 0.5 gpm per nominal inch of valve size up to a maximum of 5 gpm at an RCS pressure ≥ 2150 psia and ≤ 2190 psia.</p>	<p>18 months</p> <p><u>AND</u></p> <p>Prior to entering MODE 2 whenever the unit has been in MODE 5 for ≥ 7 days, if leakage testing has not been performed in the previous 9 months.</p>

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.14 -----NOTE----- Not required to be performed for an SL breaker when its standby bus is energized from a LCT via an isolated power path. -----</p> <p>Verify each closed SL and closed N breaker opens on an actuation of each redundant trip coil.</p>	<p>18 months</p>
<p>SR 3.8.1.15 -----NOTE----- Redundant breaker trip coils shall be verified on a STAGGERED TEST BASIS. -----</p> <p>Verify each 230 kV switchyard circuit breaker actuates to the correct position on a switchyard isolation actuation signal.</p>	<p>18 months</p>
<p>SR 3.8.1.16 -----NOTE----- Only applicable when complying with Required Action C.2.2.4. -----</p> <p>Verify one KHU provides an alternate manual AC power source capability by manual or automatic KHU start with manual synchronize, or breaker closure, to energize its non-required emergency power path.</p>	<p>As specified by Required Action C.2.2.4</p>

3.8 ELECTRICAL POWER SYSTEMS

3.8.2 AC Sources – Shutdown

LCO 3.8.2 The following AC electrical power sources shall be OPERABLE:

- a. One source from the offsite transmission network to the onsite AC electrical power distribution system(s) required by LCO 3.8.9, "Distribution Systems – Shutdown". The offsite power source shall be an offsite circuit available or connected to one of the following:
 1. 230 kV switchyard to a unit startup transformer to one main feeder bus,
 2. 230 kV switchyard, or 525 kV switchyard for Unit 3, to the main step-up and unit auxiliary transformers to one main feeder bus, or
 3. Central switchyard to one main feeder bus.
- b. One emergency power source capable of supplying the onsite AC electrical power distribution system(s) required by LCO 3.8.9. The emergency power source shall include one of the following:
 1. One Keowee Hydro Unit (KHU) capable of providing power through the underground emergency power path to one main feeder bus,
 2. One KHU capable of providing power through the overhead emergency power path to one main feeder bus, or
 3. One LCT energizing one standby bus via an isolated power path to one main feeder bus.

-----NOTES-----

1. A unit startup transformer may be shared with a Unit in MODES 1 through 6.
 2. The requirements of ITS 5.5.19, "Lee Combustion Turbine Testing Program," shall be met when a LCT is used for the emergency power requirements.
 3. The required emergency power source and required offsite power source shall not be susceptible to a failure disabling both sources.
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SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.8.2.1</p> <p>-----NOTES-----</p> <ol style="list-style-type: none"> SR requirements for both standby buses or both main feeder buses are reduced to one standby bus and one main feeder bus. SR 3.8.1.4 requirement to energize the underground emergency power path is not applicable. <p>-----</p> <p>For AC sources required to be OPERABLE, the SRs of Specification 3.8.1, "AC Sources – Operating," except SR 3.8.1.7, SR 3.8.1.13, SR 3.8.1.14, SR 3.8.1.15 and SR 3.8.1.16, are applicable.</p>	<p>In accordance with applicable SRs</p>

3.8 ELECTRICAL POWER SYSTEMS

3.8.4 DC Sources – Shutdown

LCO 3.8.4 125 VDC Vital I&C power source(s) shall be OPERABLE to support the 125 VDC Vital I&C power panelboard(s) required by LCO 3.8.9, "Distribution Systems – Shutdown" and shall include at least one of the unit's 125 VDC Vital I&C power sources.

APPLICABILITY: MODES 5 and 6,
During movement of irradiated fuel assemblies.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required 125 VDC Vital I&C power sources inoperable.	A.1 Declare affected required feature(s) inoperable.	Immediately
	<u>OR</u>	
	A.2.1 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u>	
	A.2.2 Suspend movement of irradiated fuel assemblies.	Immediately
	<u>AND</u>	
	A.2.3 Initiate action to suspend operations involving positive reactivity additions.	Immediately
	<u>AND</u>	
		(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.10.1.11	Verify for required SSF battery that the cell to cell and terminal connections are clean, tight and coated with anti-corrosion material.	12 months
SR 3.10.1.12	Verify battery capacity of required battery is adequate to supply, and maintain in OPERABLE status, the required maximum loads for the design duty cycle when subjected to a battery service test.	12 months
SR 3.10.1.13	Perform CHANNEL CALIBRATION for each required SSF instrument channel.	18 months
SR 3.10.1.14	Verify OPERABILITY OF SSF valves in accordance with the Inservice Testing Program.	In accordance with the Inservice Testing Program
SR 3.10.1.15	<p>-----NOTE----- Not applicable to the SSF submersible pump. -----</p> <p>Verify the developed head of each required SSF pump at the flow test point is greater than or equal to the required developed head.</p>	In accordance with the Inservice Testing Program
SR 3.10.1.16	Verify the developed head of the SSF submersible pump at the flow test point is greater than or equal to the required developed head.	2 years

5.5 Programs and Manuals

5.5.16 Safety Function Determination Program (SFDP) (continued)

A loss of safety function exists when, assuming no concurrent single failure, a safety function assumed in the accident analysis cannot be performed. For the purpose of this program, a loss of safety function may exist when a support system is inoperable, and:

- a. A required system redundant to the system(s) supported by the inoperable support system is also inoperable; or
- b. A required system redundant to the system(s) in turn supported by the inoperable supported system is also inoperable; or
- c. A required system redundant to the support system(s) for the supported systems (a) and (b) above is also inoperable.

The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

5.5.17 Backup Method for Determining Subcooling Margin

This program ensures the capability to accurately monitor the Reactor Coolant System Subcooling Margin. The program shall include the following:

- a. Training of personnel, and
- b. Procedures for monitoring.

5.5.18 KHU Commercial Power Generation Testing Program

The KHU Commercial Power Generation Testing Program shall include the following and shall be met during periods of KHU commercial power generation:

- a. Verify upon an actual or simulated actuation signal, each KHU's overhead tie breaker and underground tie breaker actuate to the correct position from an initial condition of commercial power generation every 18 months.
- b. Verify upon an actual or simulated actuation signal, each KHU's frequency is ≤ 66 Hz in ≤ 23 seconds from an initial condition of commercial power generation every 18 months.

BASES

APPLICABLE SAFETY ANALYSES (continued) The ESPS manual initiation ensures that the control room operator can rapidly initiate ES Functions. The manual initiation trip Function is required as a backup to automatic trip functions and allows operators to initiate ESPS whenever any parameter is rapidly trending toward its trip setpoint.

The ESPS manual initiation functions satisfy Criterion 3 of 10 CFR 50.36 (Ref. 1).

LCO

Two ESPS manual initiation channels of each ESPS Function shall be OPERABLE whenever conditions exist that could require ES protection of the reactor or RB. Two OPERABLE channels ensure that no single random failure will prevent system level manual initiation of any ESPS Function. The ESPS manual initiation Function allows the operator to initiate protective action prior to automatic initiation or in the event the automatic initiation does not occur.

The required Function is provided by two associated channels as indicated in the following table:

Function	Associated Channels
HPI and RB Non-Essential Isolation, Keowee Emergency Start, Load Shed and Standby Breaker Input, and Keowee Standby Bus Feeder Breaker Input	1 & 2
LPI	3 & 4
RB Cooling, RB Essential isolation, and Penetration Room Vent.	5 & 6
RB Spray	7 & 8

APPLICABILITY

The ESPS manual initiation Functions shall be OPERABLE in MODES 1 and 2, and in MODES 3 and 4 when the associated engineered safeguard equipment is required to be OPERABLE. The manual initiation channels are required because ES Functions are designed to provide protection in these MODES. ESPS initiates systems that are either reconfigured for decay heat removal operation or disabled while in MODES 5 and 6. Accidents in these MODES are slow to develop and would be mitigated by manual operation of individual components. Adequate time is available to evaluate unit conditions and to respond by manually operating the ES components, if required.

ATTACHMENT 3

TECHNICAL JUSTIFICATION

Attachment 3

Description of Proposed Changes and Technical Justification

The changes proposed in this license amendment request (LAR) apply to several Oconee Nuclear Station Technical Specifications (TS) and Surveillance Requirements (SR). These proposed changes have been determined to be administrative in nature. The proposed changes are listed and discussed below. A description and a technical justification are provided for each of the changes.

TS 3.3.6.b, Engineered Safeguards Protective System (ESPS) Manual Initiation

TS 3.3.6.b currently lists Engineered Safeguards (ES) Channels 3 & 4 as Low Pressure Injection and Reactor Building (RB) Essential Isolation. This is an erroneous listing. In actuality, ES channels 3 & 4 serve no RB isolation feature, essential or otherwise. This error is attributed to an administrative error that occurred during the conversion to the Oconee Improved Technical Specifications (ITS). During the conversion process, an error was made in associating ES Channels 3 & 4 with RB isolation. This is incorrect for Oconee. These channels do not actuate RB isolation. A corrective action report was initiated to investigate this error. A review of the source documents for the Oconee ITS conversion clearly show where this change was made. The error was not detected during the preparation or review process for the ITS submittal. The change was identified as administrative in nature and has been subsequently confirmed to have no technical impact on the design or operation of the plant. A conforming change will also be made to the Bases for TS 3.3.6 and is included herein for information.

TS 3.3.8, Post Accident Monitoring (PAM) Instrumentation, SR 3.3.8.3

NOTE is being changed to NOTES since this surveillance requirement has two applicable notes. This change is solely administrative in nature.

Attachment 3

Description of Proposed Changes and Technical Justification

TS 3.3.18, Emergency Power Switching Logic (EPSL) Voltage Sensing Circuits

NOTE is being changed to NOTES since there are two notes associated with this LCO. This change is solely administrative in nature.

TS 3.4.11, Reactor Coolant System (RCS) Specific Activity

In Figure 3.4.11-1 (Page 1 of 1), the misspelled word "Termal" is being corrected to "Thermal." This change is solely administrative in nature.

TS 3.4.14, Reactor Coolant System (RCS) Pressure Isolation Valve (PIV) Leakage, SR 3.4.14.1

NOTES is being changed to NOTE since this surveillance requirement has only one applicable note. This change is solely administrative in nature.

TS 3.8.1, AC Sources-Operating, SR 3.8.1.14

NOTES is being changed to NOTE since this surveillance requirement has only one applicable note. This change is solely administrative in nature.

TS 3.8.2, AC Sources-Shutdown

NOTE is being changed to NOTES since there are three notes associated with this LCO. This change is solely administrative in nature.

TS 3.8.2, AC Sources-Shutdown, SR 3.8.2.1

NOTE is being changed to NOTES since there are two notes associated with this surveillance requirement. This change is solely administrative in nature.

Attachment 3

Description of Proposed Changes and Technical Justification

TS 3.8.4, DC Sources-Shutdown

In LCO 3.8.4, the misspelled word "panelboards(s)" is being corrected to "panelboard(s)." This change is solely administrative in nature.

TS 3.10.1, Standby Shutdown Facility (SSF), SR 3.10.1.15

NOTES is being changed to NOTE since this surveillance requirement has only one applicable note. This change is solely administrative in nature.

TS 5.5.17, Programs and Manuals, Backup Method for Determining Subcooling Margin

The second item listed under this TS is currently labeled as "a." This is being corrected to "b." This change is solely administrative in nature.

ATTACHMENT 4

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Attachment 4

No Significant Hazards Consideration Determination

The following discussion is a summary of the Duke Energy Corporation (Duke) evaluation of the changes contained in this license amendment request against the three required standards of 10 CFR 50.92(c). A no significant hazards consideration is indicated if the three standards stated in this regulation are satisfied.

First Standard

Would implementation of this amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

No. This license amendment request makes editorial corrections to several Oconee Technical Specifications. These corrections are solely administrative in nature. The deletion of the Reactor Building Engineered Safeguards Channels, as proposed in the change to Technical Specification 3.3.6, Engineered Safeguards Protective System Manual Initiation, was investigated through Duke's corrective action program and also confirmed to be administrative in nature. Therefore, all the changes contained in this license amendment request are administrative in nature and have no impact on any accident probabilities or consequences.

Second Standard

Would implementation of this amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

No. There are no new accident causal mechanisms created as a result of the implementation of this license amendment request. No changes are being made to the plant which will introduce any new accident causal mechanisms. This amendment request only makes administrative changes and does not impact any plant systems that are accident initiators; therefore, no new accident types are being created.

Attachment 4

No Significant Hazards Consideration Determination

Third Standard

Would implementation of this amendment involve a significant reduction in a margin of safety?

No. Margin of safety is related to the confidence in the ability of the fission product barriers to perform their design functions during and following an accident situation. The changes proposed in this license amendment request are administrative in nature and do not affect the performance of the barriers. Consequently, no safety margins will be impacted.

Conclusion

Based upon the preceding discussion, Duke has concluded that this license amendment request does not involve a significant hazards consideration.

ATTACHMENT 5

ENVIRONMENTAL ASSESSMENT/IMPACT STATEMENT

Attachment 5

Environmental Assessment/Impact Statement

Duke Energy Corporation has determined that operation at Oconee Nuclear Station with the proposed amendment in place does not involve a significant hazards consideration (as detailed in Attachment 4). Additionally, operation with the proposed amendment will not result in any significant increases in the amounts of any effluents that may be released offsite, nor will there be any significant increases in individual or cumulative occupational radiation exposure. Therefore, the proposed amendment is eligible for categorical exclusion as set forth in 10CFR51.22(c)(9). Consequently, pursuant to 10CFR 51.22(b), it is determined that no environmental assessment or impact statement is needed in connection with the approval of the changes proposed within this license amendment request.