

January 8, 2003

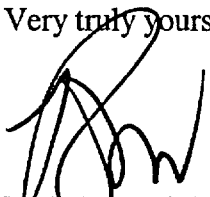
U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Subject: Oconee Nuclear Station, Units 1, 2, and 3
Docket Numbers 50-269, 50-270, and 50-287
"Revised No Significant Hazards Consideration to the Proposed License Amendment Request to Fully Credit the Standby Shutdown Facility and to Eliminate Crediting the Spent Fuel Pool to High Pressure Injection System Flow Path for Tornado Mitigation," License Amendment Request No. 2001-005

The purpose of this submittal is to provide a correction to the No Significant Hazards Consideration responses submitted as part of the June 7, 2002 proposed License Amendment Request (LAR). Specifically, the last paragraph of each response contains a statement that no changes to operating procedures will be required as a result of the proposed LAR. In fact, procedure changes will be required should the Staff approve the amendment request that, in part, eliminates crediting the Spent Fuel Pool to Low Pressure Injection flow path as one of the sources of primary system makeup following a tornado. Consequently, Duke is amending the previous responses.

There are no other changes to the No Significant Hazards Consideration responses. The attachment to this letter contains the corrected responses. Inquiries on this issue should be directed to Stephen C. Newman of the Oconee Regulatory Compliance Group at (864) 885-4388.

Very truly yours,



R. A. Jones, Vice President
Oconee Nuclear Site

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Nuclear Regulatory Commission
License Amendment Request No. 2001-005
January 8, 2003

Page 2

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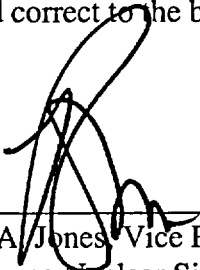
Mr. L. N. Olshan, Project Manager
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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

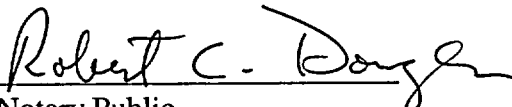
Mr. Virgil R. Autry, Director
Division of Radioactive Waste Management
Bureau of Land and Waste Management
Department of Health & Environmental Control
2600 Bull Street
Columbia, SC 29201

R. A. Jones, 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 Facility Operating License Nos. DPR-38, DPR-47, and DPR-55, for Oconee Units 1, 2, and 3 respectively, and that all the statements and matters set forth herein including those from the original license amendment request are true and correct to the best of his knowledge.



R. A. Jones, Vice President
Oconee Nuclear Site

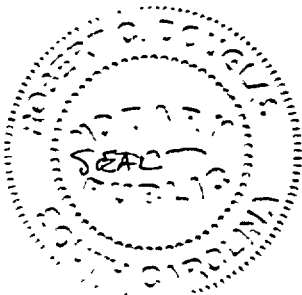
Subscribed and sworn to before me this 8th day of January, 2003



Notary Public

My Commission Expires:

August 13, 2009



ATTACHMENT 4

NO SIGNIFICANT HAZARDS CONSIDERATION

[REVISED]

Pursuant to 10 CFR 50.91, Duke Energy Corporation (Duke) has made the determination that this amendment request involves a No Significant Hazards Consideration by applying the standards established by the NRC regulations in 10 CFR 50.92. This ensures that operation of the facility in accordance with the proposed amendment would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The changes being requested in this amendment request involve (1) the elimination of the Spent Fuel Pool as a suction source to a High Pressure Injection pump for primary system make-up, and (2) to fully credit the Standby Shutdown Facility (SSF) as the primary assured means of achieving safe shutdown of all three units following a tornado. Following the modification to fully tornado protect the SSF, this facility becomes the station's assured flow path for both primary make-up and secondary decay heat removal for all three units.

Although the probability of a severe tornado strike at the station does not change, new tornado insights gained from a review of the current external event risk analysis have resulted in an enhanced risk model that more accurately characterizes station tornado damage risk. The proposed changes are part of the revised tornado mitigation strategy that provides for an assured, deterministic success path rather than the current strategy that is based on risk insights and diversity for achieving safe shutdown. This effort has resulted in an overall reduction in tornado risk at the station and consequently, would not result in a significant increase in the consequences of an accident previously evaluated.

Other than the fortification of walls of existing structures to harden them against tornado damage, there are no physical changes to the plant structures, systems, or components (SSCs), nor are there any changes to safety limits or set points. Also, no new radiological release pathways are created.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

The changes being proposed in this amendment request do not create the possibility of a new or different kind of accident from any accident previously evaluated. The initial placement of the SFP-HPI flow path into the LB was based on 1989 risk analyses that showed a potential need for primary make-up due to inventory losses from a reactor coolant pump (RCP) seal loss-of-cooling accident (LOCA). The upgrade of the RCP seals has significantly reduced the probability of a seal LOCA and subsequently, alleviated the initial reliance on the SFP-HPI flow path for primary make-up. If multi-unit primary make-up and decay heat removal

are required following an event, the tornado protected SSF RBMU or SSF ASW pumps have the capabilities to perform these functions for all three units.

Other than the fortification of walls of existing structures to harden them against tornado damage, there are no physical changes to the plant SSCs. There are no new hazardous materials or potential missiles. It does not introduce the possibility of any new or different malfunctions. No safety limits or set points are changed.

3. Involve a significant reduction in a margin of safety.

As mentioned previously, new tornado insights gained from a review of the current external event risk analysis have resulted in an enhanced risk model that more accurately characterizes station tornado damage risk. The proposed changes are part of the revised tornado mitigation strategy that provides for an assured, deterministic success path rather than a strategy that is based on risk insights and diversity for achieving safe shutdown.

There is no safety limit, set point, or design parameter changes required. The integrity of the fuel cladding, reactor coolant system, and containment are preserved. Thus, the proposed changes do not involve a significant reduction in a margin of safety.