Duke Power®
A Duke Energy Company

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January 5, 2005

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

Attention: Document Control Desk

Subject: Oconee Nuclear Station
Docket Numbers 50-269, 270 and 287
License Amendment Request associated with Lee Combustion Turbine (LCT) Testing Program, TSC Number 2004-14

Pursuant to Title 10, Code of Federal Regulations (CFR), Part 50, Section 90 (10 CFR 50.90), Duke Energy Corporation (Duke) proposes to amend Appendix A, Technical Specifications (TS), for Facility Operating Licenses DPR-38, DPR-47 and DPR-55 for Oconee Nuclear Station (ONS), Units 1, 2, and 3. The proposed amendment revises Technical Specification (TS) 5.5.19 associated with the Lee Combustion Turbine Testing Program to clarify a test requirement.

During review of the LCT Testing Program, Duke recognized that TS 5.5.19.b needs to be revised to clearly specify the LCT testing requirement. TS 5.5.19.b currently specifies Duke verify an LCT can supply the equivalent of one Unit's maximum safeguard loads plus two Unit's MODE 3 loads when connected to the system grid every 12 months. This requirement should be more clearly specified as "…plus two Unit's safe shutdown loads."

The proposed clarification has been reviewed and approved by the Plant Operations Review Committee and Nuclear Safety Review Board.

Implementation of these changes will not result in an undue risk to the health and safety of the public.

There are no UFSAR changes necessary to reflect approval of this submittal.

Pursuant to 10 CFR 50.91, a copy of this proposed amendment is being sent to the South Carolina Department of Health and

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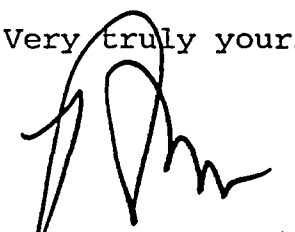
Environmental Control for review, and as deemed necessary and appropriate, subsequent consultation with the NRC staff.

Approval of this proposed LAR is requested by July 31, 2005. If there are any additional questions, please contact Boyd Shingleton at (864) 885-4716.

Very truly yours,



R. A. Jones, Vice President
Oconee Nuclear Site

cc: Mr. L. N. Olshan, Project Manager
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Mr. M. C. Shannon
Senior Resident Inspector
Oconee Nuclear Station

Mr. Henry Porter, Director
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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 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.

R. A. Jones, Vice President
Oconee Nuclear Site

Subscribed and sworn to before me this 5th day of January, 2005

Notary Public

My Commission Expires:

6/12/2013

January 5, 2005

ATTACHMENT 1

TECHNICAL SPECIFICATION

Remove Page	Insert Page
5.0-25	5.0-25

5.5 Programs and Manuals

5.5.18 KHU Commercial Power Generation Testing Program (continued)

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the KHU Commercial Power Generation Testing Program surveillance frequencies.

5.5.19 Lee Combustion Turbine Testing Program

The Lee Combustion Turbine (LCT) Testing program shall include the following and shall be met when a LCT is used to comply with Required Actions of Specification 3.8.1, "AC Sources-Operating" or as a emergency power source as allowed by LCO 3.8.2, "AC Sources-Shutdown":

a. Verify an LCT can energize both standby buses using 100kV line electrically separated from system grid and offsite loads every 12 months.

b. Verify an LCT can supply equivalent of one Unit's maximum safeguard loads plus two Unit's safe shutdown loads when connected to system grid every 12 months.

c. Verify an LCT can provide equivalent of one Unit's maximum safeguard loads within one hour through 100kV line electrically separated from system grid and offsite loads every 18 months.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Lee Combustion Turbine Testing Program surveillance frequencies.

5.5.20 Battery Discharge Testing Program

The Battery Discharge Testing Program shall include the following and shall be met for batteries used to comply with LCO 3.8.3, "DC Sources Operating."

a. Verify battery capacity is ≥ 80% of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test once every 60 months. This frequency shall be reduced to 12 months when battery shows degradation, or has reached 90% of the expected life with capacity < 100% of manufacturer's rating, and 24 months when battery has reached 90% of the expected life with capacity ≥ 100% of manufacturer's rating.

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ATTACHMENT 2

MARKUP OF TECHNICAL SPECIFICATION

5.5 Programs and Manuals

5.5.18 KHU Commercial Power Generation Testing Program (continued)

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5.5.19 Lee Combustion Turbine Testing Program

The Lee Combustion Turbine (LCT) Testing program shall include the following and shall be met when a LCT is used to comply with Required Actions of Specification 3.8.1, "AC Sources-Operating" or as a emergency power source as allowed by LCO 3.8.2, "AC Sources-Shutdown":

a. Verify an LCT can energize both standby buses using 100kV line electrically separated from system grid and offsite loads every 12 months.

b. Verify an LCT can supply equivalent of one Unit's maximum safeguard loads plus two Unit's MODE 3 loads when connected to system grid every 12 months.

safe shutdown

c. Verify an LCT can provide equivalent of one Unit's maximum safeguard loads within one hour through 100kV line electrically separated from system grid and offsite loads every 18 months.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Lee Combustion Turbine Testing Program surveillance frequencies.

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The Battery Discharge Testing Program shall include the following and shall be met for batteries used to comply with LCO 3.8.3, "DC Sources Operating."

a. Verify battery capacity is ≥ 80% of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test once every 60 months. This frequency shall be reduced to 12 months when battery shows degradation, or has reached 90% of the expected life with capacity < 100% of manufacturer's rating, and 24 months when battery has reached 90% of the expected life with capacity ≥ 100% of manufacturer's rating.

Attachment 3
Technical Justification

Overview

The proposed amendment revises Technical Specification (TS) 5.5.19 associated with the Lee Combustion Turbine Testing Program to clarify a test requirement.

During review of the LCT Testing Program, Duke recognized that TS 5.5.19.b needs to be revised to more accurately specify the LCT testing requirement. TS 5.5.19.b currently specifies Duke verify an LCT can supply the equivalent of one Unit's maximum safeguard loads plus two Unit's MODE 3 loads when connected to system grid every 12 months. This requirement should be more precisely specified as "…plus two Unit's safe shutdown loads."

Description of the Technical Specification Change

The proposed change revises TS 5.5.19.

TS 5.5.19 - Lee Combustion Turbine Testing Program

TS 5.5.19.b states: "Verify an LCT can supply equivalent of one Unit's maximum safeguard loads plus two Unit's MODE 3 loads when connected to system grid every 12 months." The proposed TS change revises TS 5.5.19.b to more precisely state: "Verify an LCT can supply equivalent of one Unit's maximum safeguard loads plus two Unit's safe shutdown loads when connected to system grid every 12 months."

Justification for Change

Prior to Amendment 232, 232, 231, TS 4.6.8 stated: "Annually, it shall be demonstrated that a Lee station combustion turbine can be started and carry the equivalent of the maximum safeguards load of one Oconee unit plus the safe shutdown loads of two Oconee units on the system grid." In a rewrite (Amendment 232, 232, 231) of these original Technical Specifications, the terminology "safe shutdown loads" was replaced with "hot shutdown loads." Prior to

implementation of this amendment, the Improved Technical Specifications conversion (Amendment 300, 300, 300) replaced "hot shutdown loads" with "MODE 3 loads." The "rewrite" and the ITS conversion were implemented concurrently. In either case, the revised wording was characterized as administrative and not intended to change the testing requirements. During the conversion to Improved Technical Specifications (ITS), MODE 3 was determined to best generically describe the characteristics of hot shutdown from the original Technical Specification. Each use of MODE 3 in the ITS was evaluated for the appropriate application. However, for this particular case "Hot Shutdown Loads" would have been more accurately described by MODE 4 loads (or safe shutdown loads). As currently worded, TS 5.5.19.b could be taken to mean that an LCT must be tested to the maximum MODE 3 loads of two Units, which would include condensate booster pumps and reactor coolant pumps. This is clearly not a design basis requirement, since these loads are shed and will not automatically start after a loss of offsite power (LOOP) or loss of coolant accident (LOCA).

The Lee Combustion Turbines are tested to carry the equivalent maximum safeguard loads of one unit plus shutdown loads (or safe shutdown loads) of two units as shown in UFSAR Table 8-1, Loads to be Supplied from the Emergency Power Source. Table 8-1 provides a list of Oconee loads which automatically start after a LOOP or LOCA, and the Oconee loads which are required to mitigate the event. The UFSAR Table 8-1 loads are approximately 13.5 MW (15,971 KVA x .85 Power Factor). Periodic Test, PT/0/A/0610/023 - Lee Gas Turbine Operation to the Grid Verification, verifies annually that Lee can meet TS 5.5.19.b.

Attachment 4
No Significant Hazards Consideration

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:

Duke proposes to revise TS 5.5.19.b to clarify the Lee Combustion Turbine (LCT) testing requirements. The proposed change makes the wording of the test requirement consistent with the UFSAR and the original wording of the TS requirement before administrative changes were made in Amendment 232, 232, 231, and Amendment 300, 300, and 300. LCT testing has no impact on the probability of an accident analyzed in the UFSAR. The LCT can be credited to mitigate the consequences of an accident analyzed in the UFSAR. However, this clarification of LCT testing requirements has no impact on its ability to mitigate the consequences of an accident. As such, the proposed LAR does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Duke proposes to revise TS 5.5.19.b to clarify the Lee Combustion Turbine (LCT) testing requirements. The proposed change makes the wording of the test requirement consistent with the UFSAR and the original wording of the TS requirement before administrative changes were made in Amendment 232, 232, 231, and Amendment 300, 300, and 300. These changes do not alter the nature of events postulated in the Safety Analysis Report nor do they introduce any unique precursor mechanisms. Therefore, the proposed amendment will not

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

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

The proposed TS change does not unfavorably affect any plant safety limits, set points, or design parameters. The changes also do not unfavorably affect the fuel, fuel cladding, RCS, or containment integrity. Therefore, the proposed TS change, which clarifies TS requirements associated with the LCT testing program, does not involve a significant reduction in the margin of safety.

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

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Attachment 5

ATTACHMENT 5

Environmental Assessment

Pursuant to 10 CFR 51.22(b), an evaluation of the license amendment request (LAR) has been performed to determine whether or not it meets the criteria for categorical exclusion set forth in 10 CFR 51.22(c)9 of the regulations. The LAR does not involve:

1) A significant hazards consideration.

   This conclusion is supported by the determination of no significant hazards contained in Attachment 4.

2) A significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

   This LAR will not change the types or amounts of any effluents that may be released offsite.

3) A significant increase in the individual or cumulative occupational radiation exposure.

   This LAR will not significantly increase the individual or cumulative occupational radiation exposure.

In summary, this LAR meets the criteria set forth in 10 CFR 51.22 (c)9 of the regulations for categorical exclusion from an environmental impact statement.