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September 4, 2012


U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Subject: Duke Energy Carolinas, LLC
Oconee Nuclear Station
Docket Numbers 50-269, 50-270, and 50-287
Selected Licensee Commitments Manual (SLC)

Gentlemen:

Pursuant to 10CFR 50.4 and 50.71, please find attached the latest revision to the Oconee Selected Licensee Commitments (SLC) Manual. SLC 16.9.5 was revised to support the ONS License Renewal Application that specifically states that fire doors are visually inspected bi-monthly and functionally tested bi-monthly.

Sincerely,


T. Preston, Gillespie, Jr.
Vice President
Oconee Nuclear Station

Attachment

U.S. Nuclear Regulatory Commission
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xc:

Mr. Victor M. McCree, Administrator, Region II
U.S. Nuclear Regulatory Commission
Marquis One Tower
245 Peachtree Center Ave., NE, Suite 1200
Atlanta, GA 30303-1257

Mr. John P. Boska, Project Manager
(By electronic mail only)
U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
One White Flint North, M/S O-8G9A
11555 Rockville Pike
Rockville, MD 20852

NRC Senior Resident Inspector
Oconee Nuclear Station

September 4, 2012

Subject: Oconee Selected Licensee Commitments Manual (SLC) Revision

On August 3, 2012, Station Management approved the following Oconee Selected Licensee Commitments. SLC 16.9.5, to support the ONS License Renewal Application that specifically states that Fire doors are visually inspected bi-monthly and functionally tested bi-monthly.

Please revise your manual as instructed below.

Remove these pages

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Insert these pages

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Any questions concerning these revisions may be directed to Kent Alter at 864-873-3255.

Regulatory Compliance
By: Gail Joyner
Regulatory Compliance

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16.13.10-1	3/27/99
16.13.11-1	3/27/99
16.14.1-1	3/27/99
16.14.2-1	07/23/12
16.14.2-2	07/23/12
16.14.3-1	3/27/99
16.14.4-1	Deleted 3/15/11
16.14.4.a-1	3/15/11
16.15.1-1	4/12/06
16.15.1-2	Deleted 4/12/06
16.15.1-3	Deleted 4/12/06
16.15.1-4	Deleted 4/12/06
16.15.1-5	Deleted 4/12/06
16.15.2-1	09/10/07
16.15.2-2	09/10/07
16.15.2-3	09/10/07
16.15.2-4	09/10/07
16.15.2-5	09/10/07
16.15.3-1	4/12/06
16.15.3-2	4/12/06
16.15.3-3	4/12/06
16.15.3-4	4/12/06
16.15.3-5	4/12/06

16.9 AUXILIARY SYSTEMS

16.9.5 Fire Barriers

COMMITMENT All Fire Barriers (including mechanical and electrical penetrations, fire doors, fire dampers, walls, ceilings and floors) boundaries, as shown on the O-310-K and O-310-L series drawings, shall be OPERABLE.

APPLICABILITY: At all times

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. Required Fire Barrier inoperable.</p> <p><u>AND</u></p> <p>There is OPERABLE fire detection instrumentation within 15 feet on both sides of the fire barrier boundary inoperability location.</p>	<p>A.1 Determine OPERABILITY status of fire detection instrumentation for the affected area(s).</p> <p><u>AND</u></p> <p>A.2 Establish an hourly fire watch patrol on at least one side of the fire boundary.</p>	<p>1 hour</p> <p>1 hour</p>
<p>B. Required Fire Barrier inoperable.</p> <p><u>AND</u></p> <p>Affected Area(s) has OPERABLE fire detection instrumentation within 15 feet on only one side of the fire barrier boundary inoperability location.</p>	<p>B.1 Determine OPERABILITY status of fire detection instrumentation for the affected area(s).</p> <p><u>AND</u></p> <p>B.2 Establish hourly fire watch patrol in the area that does not have OPERABLE fire detection instrumentation.</p>	<p>1 hour</p> <p>1 hour</p>

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Required Fire Barrier inoperable. <u>AND</u> Affected Area(s) has no OPERABLE fire detection instrumentation within 15 feet.	C.1 Establish continuous fire watch on one side of affected penetration fire barrier.	1 hour

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 16.9.5.1	Visually inspect exposed surfaces of each fire rated barrier except fire doors.	18 months
SR 16.9.5.2	Visually inspect at least 10% of all fire dampers. If apparent changes in appearance or abnormal degradation is found, a visual inspection of an additional 10% of the dampers shall be made. This inspection process shall continue until a 10% sample with no apparent changes in appearance or abnormal degradation is found. Samples shall be selected such that each fire damper will be inspected every 15 years.	18 months
SR 16.9.5.3	Visually inspect at least 10% of each type of sealed penetration. If apparent changes in appearance or abnormal degradations are found, a visual inspection of an additional 10% of each type of sealed penetration shall be made. This inspection process shall continue until a 10% sample with no apparent changes in appearance or abnormal degradation is found. Samples shall be selected such that each penetration seal will be inspected every 15 years.	18 months
SR 16.9.5.4	Visually inspect and functionally test fire doors in Units 1, 2, and 3 as identified in the implementing procedure.	2 months

BASES

The functional integrity of the penetration fire barriers (including mechanical and electrical penetrations, fire doors, fire dampers, walls, and floors) ensures that fires will be confined or adequately retarded from spreading to adjacent portions of the facility. This design feature minimizes the possibility of a single fire rapidly involving several areas of the facility prior to detection and extinguishment. The penetration fire barriers are a passive element in the facility fire protection program and are subject to periodic inspections and sampling.

The OPERABILITY of a NRC committed fire barrier ensures that fires will be confined or adequately retarded from spreading to adjacent portions of the facility. The regulatory requirement is to have NRC committed Fire Barriers OPERABLE only when the equipment it is protecting is required OPERABLE for plant safety. However, to also protect the equipment for property conservation and minimize equipment loss due to fire; the Oconee and Keowee NRC committed Fire Barriers will be required to be OPERABLE at all times.

During periods of time when a barrier is not functional, a fire watch patrol will be required to inspect the affected area frequently as a precaution in addition to the fire detection instrumentation in the area. If fire detection instrumentation in the area is not operable, a continuous fire watch is required to be maintained in the vicinity of the affected barrier until the barrier is restored to functional status. Fire detection is not specifically designed at ONS to provide early detection of fire near the committed fire boundaries as denoted on the drawing series O-310K and O-310L. Fire detection instrumentation design locations were typically based on protecting specific equipment and areas important to safety or where major fire hazards were located and not to provide full detection coverage for all areas of the plant. In actuality fire detection instrumentation's ability to quickly respond to the incipient stages of a fire are based on distance from the hazard, type of hazard, obstruction, and air flows in the area. The application of the specific fire detection instrumentation used at ONS provide a adequate response time for a floor distance of approximately 15 feet in radius from the detector location.

This Selected Licensee Commitment is part of the Oconee Fire Protection Program and therefore subject to the provisions of Oconee Facility Operating License Conditions.

REFERENCES:

1. Oconee UFSAR, Chapter 9, Section 9.5.1 and UFSAR, Chapter 18, Table 18-1 (Portions of this SLC are credited in the Fire Protection Program for License Renewal).
2. Oconee License Renewal Commitments, OSS-0274.00-00-0016.
3. Oconee Fire Protection SER dated August 11, 1978.
4. Oconee Fire Protection Review, (currently contained in the Fire Protection DBD), as revised.
5. Oconee Plant Design Basis Specification for Fire Protection, as revised.
6. NUREG-1723, Safety Evaluation Report Related to the License Renewal of Oconee Nuclear Station, Units 1, 2, and 3 dated March 1, 2000.