DUKE ENERGY®

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ONS-2014-060

May 12, 2014

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2746

Subject: Duke Energy Carolinas, LLC
Oconee Nuclear Station
Docket Numbers 50-269, 50-270, and 50-287
UFSAR/Selected Licensee Commitments Change

Pursuant to 10CFR 50.71(e), please find attached the latest revision to the Oconee Nuclear Station Selected Licensee Commitments (SLC) Manual. This document constitutes Chapter 16 of the Updated Final Safety Analysis Report (UFSAR).

Any questions regarding this information should be directed to Sandra Severance, Regulatory Affairs, at (864) 873-3466.

I certify that I am a duly authorized officer of Duke Energy Carolinas, LLC, and that the information contained herein accurately represents changes made to Chapter 16 of the UFSAR since the previous submittal. I declare under penalty of perjury that the foregoing is true and correct. Executed on May 8, 2014.

Sincerely,

Scott L. Batson
Vice President
Oconee Nuclear Station

Attachment

A053
NRR

cc: Mr. Victor McCree, Regional Administrator
U.S. Nuclear Regulatory Commission, Region II
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Atlanta, GA 30303-1257

Mr. James R. Hall, Senior Project Manager (ONS)
(By electronic mail only)
U.S. Nuclear Regulatory Commission
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Mr. Eddy Crowe
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Oconee Nuclear Station

DUKE ENERGY®

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May 8, 2014

Re: Oconee Nuclear Station
Selected Licensee Commitments (SLC) Manual Change
Revision Dates: 04/21/2014, 04/08/2014, 04/08/2014, and 05/01/2014

Please replace the corresponding pages in your copy of the Oconee SLC Manual as follows:

REMOVE THESE PAGES	**INSERT THESE PAGES**
List of Effective Pages (LOEP) 1- 13	List of Effective Pages (LOEP) 1- 13
SLC Pages 16.6.14-1 thru 4	SLC Pages 16.6.14-1 thru 4
SLC Pages 16.7.6-1 thru 4	SLC Pages 16.7.6-1 thru 4
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SLC Pages 16.13.1-1 thru 9	SLC Pages 16.13.1-1 thru 10

If you have any questions concerning the contents of this SLC Manual update, contact Sandra Severance (864) 873-3466.

Chris Wasik
Regulatory Affairs Manager

Attachment

Oconee Nuclear Station

Revised Selected Licensee Commitments Manual Pages

Oconee Nuclear Station
Selected Licensee Commitments Revised 05/01/14

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16.13.2-4	Delete 12/15/04
16.13.3-1	12/15/04
16.13.3-2	Delete 12/15/04
16.13.4-1	3/27/99
16.13.5-1	Delete
16.13.5-2	Delete
16.13.6-1	3/27/99
16.13.7-1	12/15/04
16.13.7-2	12/15/04
16.13.8-1	3/27/99
16.13.9-1	3/27/99
16.13.9-2	3/27/99
16.13.10-1	3/27/99
16.13.11-1	3/27/99
16.14.1-1	11/15/12
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

Oconee Nuclear Station
Selected Licensee Commitments Revised 05/01/14

List of Effective Pages

Page	Revision Date
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	11/15/12
16.15.2-2	11/15/12
16.15.2-3	11/15/12
16.15.2-4	11/15/12
16.15.2-5	11/15/12
16.15.3-1	11/15/12
16.15.3-2	11/15/12
16.15.3-3	11/15/12
16.15.3-4	11/15/12
16.15.3-5	11/15/12

16.6 ENGINEERED SAFETY FEATURES

16.6.14 Control of HPI and LPI/RBS Pump Room Temperatures

COMMITMENT: The HPI and LPI/RBS Pump Room temperatures shall be within limits.

APPLICABILITY: MODES 1, 2, 3, and 4 for LPI/RBS,
MODES 1, 2, and 3 with RCS > 350°F for HPI.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. HPI Pump Room temperature not within limits.	A.1 Declare all HPI pumps inoperable.	Immediately
B. LPI/RBS Pump Room temperature not within limits.	B.1 Declare all affected LPI pumps inoperable. AND B.2 Declare all affected RBS pumps inoperable.	Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 16.6.14.1	Verify HPI Pump Room temperature is nominally ≤ 130°F.	12 hours
SR 16.6.14.2	Verify LPI/RBS Pump Room temperature is nominally ≤ 115°F.	12 hours

BASES

BACKGROUND

This commitment provides guidance on the need to ensure that the initial room temperatures assumed in room heat up calculations for Oconee's HPI and LPI/RBS room temperature response to Small Break Loss Of Coolant Accident (LOCA) and Large Break LOCA events are maintained. Auxiliary Building Ventilation is a non-safety system and is not credited for post-accident operation (Ref. 1). During accident scenarios, heat loads in rooms containing HPI, LPI, and RBS pumps and motors are expected to significantly rise due to the operation of the pumps and motors. Temperature rise in these rooms has been modeled based on assumed starting temperatures and heat transfer characteristics of the rooms (no forced cooling). Surveillance temperatures have been established to ensure that the initial starting temperatures assumed in the analysis remain valid.

If these room temperatures are not maintained within the surveillance limits, temperature limits for HPI, LPI, and RBS equipment may be exceeded under worst case accident conditions. When room temperatures cannot be maintained below surveillance temperatures, then immediate action should be taken to ensure appropriate HPI, LPI, or RBS pump/motors are declared inoperable.

APPLICABLE SAFETY ANALYSES

Maintaining normal room temperatures ensures that in the event of a Small or Large Break LOCA event, temperature limits for HPI, LPI, and RBS pumps and motors will not be exceeded during the required mission time for the equipment (Ref. 2, 3, 4).

APPLICABILITY

Since this SLC is used to ensure HPI and LPI/RBS pump and motor operability limits are not exceeded during events when room temperatures rise, this SLC is applicable when the provisions of TS 3.5.2 (HPI), TS 3.5.3 (LPI), and TS 3.6.5 (RBS) are applicable.

In MODES 1, 2, 3, and 4, LPI and RBS are required to be OPERABLE per the requirements of TS 3.5.3 and TS 3.6.5. In MODES 1, 2, and 3 with RCS > 350°F, HPI is required to be OPERABLE per the requirements of TS 3.5.2. HPI/LPI/RBS pumps and motors are required for train operability. When HPI or LPI/RBS pump room temperatures are within the surveillance limits, pump/motor temperature design limits will not be exceeded during a LOCA event.

ACTIONS

A.1

If HPI pump room temperatures are not within limits, all HPI pumps on the affected Unit are declared inoperable immediately. Room temperatures are monitored in the Unit 1, Unit 2 and Unit 3 HPI Pump rooms. Even though physical layout and actual room numbering may differ, all HPI pumps/motors for one Unit are considered to be in a single room for the purposes of

BASES

A.1 (continued)

analysis. Should one of the temperatures be found outside the surveillance limits, pump/motor temperature design limits may be exceeded during LOCA events. HPI Pumps in the affected room must be declared inoperable. Below is a list of rooms with equipment contained in the room for analysis purposes:

Room	Pumps/Motors
54	Unit 1 HPI
58	Unit 2 HPI
77	Unit 3 HPI

B.1 and B.2

If LPI/RBS Pump Room temperatures are not within limits, all LPI/RBS pumps in the affected room are declared inoperable immediately. Room temperatures are monitored in the Unit 1 LPI/RBS Pump Room, Unit 2 LPI/RBS Pump Room and the shared Unit 1/2 LPI/RBS Pump Room. Room temperatures are also monitored in the two Unit 3 LPI/RBS Pump Rooms. Should one of the temperatures be found outside the surveillance limits, pump/motor temperature design limits may be exceeded during LOCA events. LPI/RBS Pumps in the affected room must be declared inoperable. Below is a list of rooms with equipment contained in the room for analysis purposes:

Room	Pumps/Motors
61	Unit 1 A LPI
	Unit 1 A RBS
62	Unit 1 B LPI
	Unit 1 B RBS
	Unit 2 B LPI
	Unit 2 B RBS
63	Unit 2 A LPI
	Unit 2 A RBS
81	Unit 3 B LPI
	Unit 3 B RBS
82	Unit 3 A LPI
	Unit 3 A RBS

SURVEILLANCE REQUIREMENTS

SR 16.6.14.1 and SR 16.6.14.2

This SLC specifies Surveillance Requirements for room temperatures in the HPI and LPI/RBS pump rooms. SLC SR 16.6.14.1 and SR 16.6.14.2 require room temperature monitoring be performed at a 12 hour frequency. HPI pump rooms are limited to 130°F during normal operation and LPI/RBS pump room are limited to 115°F during normal operation. Maintaining

BASES

SR 16.6.14.1 and SR 16.6.14.2 (continued)

temperatures below these limits ensures that pump and motor temperature limits for HPI, LPI, and RBS will not be exceeded during LOCA events. Surveillance frequencies are based on engineering judgment. Room temperature changes due to ambient temperature changes, loss of ventilation equipment, or abnormal pump operation will be slow such that 12 hour monitoring frequencies will provide adequate awareness of the temperature changes.

References

1. UFSAR Section 9.4.3.

2. TS Bases B 3.5.2

3. TS Bases B 3.5.3.

4. TS Bases B 3.6.5

16.7 INSTRUMENTATION

16.7.6 Diverse Actuation Systems

COMMITMENT

a. Two input channels and the actuation logic of the Diverse Low Pressure Injection Actuation System (DLPIAS) shall be functional.

b. Two input channels and the actuation logic of the Diverse High Pressure Injection Actuation System (DHPIAS) shall be functional.

APPLICABILITY: MODE 1 and 2,
MODE 3 and 4 when ESPS channels are required to be OPERABLE

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required input channels OR actuation logic of DLPIAS nonfunctional	A.1 Restore DLPIAS to functional status.	7 days
B. One or more required input channels OR actuation logic of DHPIAS nonfunctional.	B.1 Restore DHPIAS to functional status.	7 days

(continued)

ACTION (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Required Action and associated Completion Time not met.	----------NOTE---------- When initiated, the Required Action must be completed. ----------	
	C.1 Submit a written report to the NRC outlining the cause of the channel(s) or system(s) malfunction and the plans for restoring the channel(s) or system(s) to functional status.	30 days

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 16.7.6.1	Perform an input Channel Calibration of DLPIAS.	24 months
SR 16.7.6.2	Perform an input Channel Calibration of DHPIAS.	24 months
SR 16.7.6.3	Perform an Actuation Test of DLPIAS.	24 months
SR 16.7.6.4	Perform an Actuation Test of DHPIAS.	24 months.

BASES

The DLPIAS and DHPIAS are provided to mitigate the consequences of software common mode failure (SWCMF) coincident with selected Chapter 15 events as detailed in the Defense in Depth and Diversity (D^3) analysis as submitted on March 20, 2003 (Reference 1) and approved by NRC letter dated January 28, 2010 (Reference 2). These events are beyond the design basis for the plant and are associated with a failure of the Engineered Safeguards Protective System (ESPS) to actuate LPI or HPI when required.

The DHPIAS provides automatic High Pressure Injection (HPI) in the case of the Small Break Loss of Coolant Accident (SBLOCA) concurrent with a SWCMF of the digital ESPS. The DHPIAS automatically actuates HPI and other ESPS Channel 1 and Channel 2 components on Low Reactor Coolant (RC) Pressure. Additionally, manual initiation can be accomplished using ESPS Trip/Reset pushbuttons located on the main control board. The trip circuit for the ESPS manual trip bypasses the ESPS logic and allows the operator to initiate Engineered Safeguards (ES) actuation on a per channel basis. The DHPIAS actuation setpoint (Reference 3) is set to initiate an HPI actuation after an ESPS initiated actuation of HPI. The DHPIAS consists of three redundant channels each receiving input from its own measurement channel. An input channel consists of an ESPS RCS pressure input signal, its bistable, and its associated bistable interposing trip relay and its contacts. Only two channels are required to be functional as defined by Reference 4. The DHPIAS trip circuit requires 2 bistables to be tripped for an HPI actuation to occur. Actuation circuit relays are energized to actuate which prevents a loss of 120VAC or 24VDC control power from resulting in an actuation. The actuation logic consists of all components in DHPIAS (other than the input channel components) required for an actuation signal satisfied by two tripped bistables to be provided to the ES Channel 1 and 2 output interposing relays. The Non-Safety Related Reactor Coolant pressure signals fed into the DHPIAS are isolated from the Safety-Related Reactor Coolant pressure signals utilizing signal isolators. The signal isolation occurs in the Safety-Related analog signal conditioning portion of the ESPS prior to the analog-to-digital conversion. The channel calibration surveillance requirement verifies proper calibration from the ESPS RCS pressure input signal to the DHPIAS bistables. The actuation test verifies the trip logic combinations and that a system trip signal is applied to the ES Channel 1 and 2 output interposing relays. DHPIAS is considered functional if it has met the surveillance requirements of this commitment, two input channels are functional, the DHPIAS Bypassed statalarm is not on, and the DHPIAS Override light (in the control room) is not on.

The DLPIAS provides automatic Low Pressure Injection (LPI) in the case of the Large Break Loss of Coolant Accident (LBLOCA) concurrent with a SWCMF of the digital ESPS. The DLPIAS automatically actuates LPI and other ESPS channel 3 and channel 4 components on Low-Low Reactor Coolant (RC) pressure. Additionally, manual initiation can be accomplished using ESPS Trip/Reset pushbuttons located on the main control board. The trip circuit for the ESPS manual trip bypasses the digital ESPS logic and allows the operator to initiate Engineered Safeguards (ES) actuation on a per channel basis. The DLPIAS actuation setpoint (Reference 3) is set to initiate an LPI actuation after an ESPS initiated actuation of LPI. The DLPIAS consists of three redundant channels each receiving input from its own measurement channel. An input channel consists of a bistable, its associated RCS pressure input signal, and its associated bistable interposing trip relay. Only two channels are required to be functional as defined by Reference 4. The DLPIAS trip circuit requires 2 bistables to be tripped for an LPI

actuation to occur. Actuation circuit relays are energized to actuate which prevents a loss of 120VAC or 24VDC control power from resulting in an actuation. The actuation logic consists of all components in DLPIAS (other than the input channel components) required for an actuation signal satisfied by two tripped bistables to be provided to the ES Channel 3 and 4 output interposing relays. The Non-Safety-Related Reactor Coolant pressure signals fed into the DLPIAS are isolated from the Safety-Related Reactor Coolant pressure signals utilizing signal isolators. The signal isolation occurs in the Safety-Related analog signal conditioning portion of the ESPS prior to the analog-to-digital conversion. The channel calibration surveillance requirement verifies proper calibration from the ESPS RCS pressure input signal to the DLPIAS bistables. The actuation test verifies the trip logic combinations and that a system trip signal is applied to the ES Channel 3 and 4 output interposing relays. DLPIAS is considered functional if it has met the surveillance requirements of this commitment, two input channels are functional, the DLPIAS Bypassed statalarm is not on, and the DLPIAS Override light (in the control room) is not on.

The DLPIAS allows acceptance criteria to be met for the D^3 Analysis performed for the LBLOCA concurrent with a SWCMF of the digital ESPS. The DHPIAS eliminates the need to rely on operator action and allows acceptance criteria to be met for the SBLOCA concurrent with a SWCMF.

REFERENCES:

1. Duke letter to NRC dated March 20, 2003, Defense in Depth and Diversity Assessment Associated with the Digital Upgrade of Oconee's Reactor Protective System and Engineered Safeguards Protective System
2. NRC letter to Duke dated January 28, 2010, Safety Evaluation Report for Oconee RPS/ESPS Digital Upgrade.
3. Calculation OSC-8125, Diverse High/Low Pressure Injection Actuation System Loop Uncertainty and Setpoint.
4. NSD 203, Revision 23, Operability/Functionality.

16.7 INSTRUMENTATION

16.7.15 Engineered Safeguards Protective System (ESPS) Voter Trouble Alarm

COMMITMENT ESPS Voter Trouble Alarm shall not be in alarm

APPLICABILITY: MODE 1 and 2,
MODE 3 and 4 when ESPS channels are required to be OPERABLE

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. ESPS Voter Trouble Alarm is in alarm	A.1	Initiate an investigation to determine the cause of the alarm.	Immediately
OR	AND		
ESPS Voter Trouble is in alarm and new alarm identified during performance of SR 16.7.15.1	A.2	Determine the cause of the alarm and its effect on Voter OPERABILITY.	12 hours
B. ESPS Voter Trouble Alarm is in alarm And OPERABILITY of required ESPS Voter not affected	B.1	Perform SR 16.7.15.1.	12 hours AND Once per 12 hours thereafter

(continued)

ACTION (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Required Action and associated Completion Time not met.	C.1 Declare the ESPS Voter inoperable and enter TS 3.3.7 Condition A.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 16.7.15.1	Conduct enhanced monitoring of the ESPS Voter status and associated equipment.	As required by Required Action B.1

BASES

Background

Most of the failures that result in an ESPS Voter Trouble alarm have no effect on the ESPS Voter's ability to perform its safety function. Therefore, the receipt of a Trouble alarm in itself does not indicate inoperability of a voter. Once an ESPS Voter Trouble alarm is received, investigation is required to determine the cause so that the required action can be taken. Investigation would include review of the Operator Aid Computer (OAC) Trouble alarm points associated with individual voters to determine whether the problem is with Voter 1 or 2. If this is not successful, the voters can be observed at the cabinet. A problem confined to an individual voter will be apparent from observing the indicating lights for the sub-racks. If the problem is with the voter, the voter can then be placed in Bypass. This will block the alarm signals from that voter so that the Trouble alarm circuit can be cleared and is now available to monitor the operable voter while the voter with the problem is repaired.

Commitment

Automatic monitoring (both hardware and software monitoring) is performed by the ESPS system. If a problem is detected with a voter, the control room operator is alerted via a voter trouble statalarm for the redundant voters (one statalarm for the Odd Voters and one for the Evens). These ESPS Voter Trouble Alarms shall not be in alarm.

Actions

If a Voter Trouble statalarm is in alarm, Required Action (RA) A.1 requires an investigation to determine the cause to begin immediately and RA A.2 requires it to be completed within 12 hours. Most problems can be quickly isolated to one of the two redundant voters. The problem voter can then be bypassed which clears the Voter Trouble statalarm which allows the SLC Condition to be exited. Some hardware problems within the voter cabinet are common to the redundant voters. If one of the common hardware problems is causing the Voter Trouble alarm, determination of the cause is necessary to determine operability of the redundant voters. If the common hardware problem renders the redundant voters inoperable or if the operability determination cannot be made within the allotted time, the voters are declared inoperable per Action C and actions are taken per Technical Specification 3.3.7. If an ESPS Voter Trouble Alarm is in alarm and OPERABILITY of the required ESPS Voter is not affected, RA B.1 requires SR 16.7.15.1 to be performed within 12 hours and every 12 hours thereafter until the problem is resolved since the common hardware problem will lock the statalarm in the alarm state. SR 16.7.15.1 requires enhanced monitoring of the ESPS Voter status and associated equipment.

Surveillance Requirements

Monitoring of the voters is necessary per Required Action B.1 until the problem is resolved since the common hardware problem will lock the statalarm in the alarm state.

REFERENCES:

1. NRC letter to Duke dated January 28, 2010, Safety Evaluation Report for Oconee RPS/ESPS Digital Upgrade.
2. PIP O-11-4327, April 13, 2011.

16.13 CONDUCT OF OPERATIONS

16.13.1 Minimum Station Staffing Requirements

COMMITMENT a. Minimum station staffing shall be as indicated in Table 16.13.1-1 and shall meet the following additional requirements:

1. At least one RO per unit shall be present in the control room when fuel is in the reactor. In addition, while the unit is in MODES 1, 2, 3, or 4, at least one licensed SRO shall be present in the control room.

2. At least one licensed operator shall be in the reactor building when fuel handling operations in the reactor building are in progress. In addition, during CORE ALTERATIONS including fuel loading and transfer, an SRO or an SRO limited to fuel handling shall be present to directly supervise the activity and, during this time, shall not be assigned to other licensed activities.

3. If the computer for a reactor is inoperable for more than eight hours, an operator, in addition to those specified in ITS 5.2.2.b and 10 CFR 50.54(m) shall supplement the control room staff.

b. The Shift Technical Advisor shall be an experienced SRO.

c. Shift fire brigade staffing shall remain at 10, twice that required by NFPA 805, until Protected Service Water (PSW) System is complete (Reference 15).

APPLICABILITY: At all times.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Requirements for minimum station staffing not met.	A.1 Restore minimum station staffing levels.	2 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 16.13.1.1	N/A	N/A

Table 16.13.1-1

MINIMUM STATION STAFFING REQUIREMENTS

	THREE UNITS IN MODES 1-4	TWO UNITS IN MODES 1-4 CONTROLLED FROM TWO CONTROL ROOMS	TWO UNITS IN MODES 1-4 CONTROLLED FROM ONE CONTROL ROOM	ONE UNIT IN MODES 1 - 4	THREE UNITS IN MODES 5 OR 6 OR NO MODE
OSM	1	1	1	1	1
STA	1	1	1	1	1
SRO[1]	5	5	4	4	3
RO[3]	6	5	5	4	3
NLO[1,2]	8	8	8	8	7
SPOC	7	7	7	7	6
Chemistry Technician	1	1	1	1	1
RP Technician	3	3	3	3	3

1 SRO number can be reduced by one when a qualified NLO is designated the fire brigade leader. The NLO number must be increased by one, or one fire brigade member must be supplied from another organization.

2 NLO number must be increased by two when in ITS 3.5.2 Condition B.

3 RO number must be increased by one when in ITS 3.5.2 Condition B.

BASES

Some of the requirement(s) of this SLC section were relocated from TS 6.1.1.9 and TS Table 6.1-1 during the conversion to ITS. These requirements were initially relocated to SLC 16.13.5, "Additional Operating Shift Requirements," dated 3/27/97.

The requirements of this SLC consolidate ONS station staffing requirements into one document. This SLC includes the shift manning requirements of ITS 5.2.2, 10 CFR 50.48, 10 CFR 50.54.m, Operations Management Procedures (OMPs), NSD 112, and the Emergency Plan. This SLC also includes the old requirements of SLC 16.13.1, "Fire Brigade," dated 3/27/99 and SLC 16.13.5, "Additional Operating Shift Requirements dated 3/27/99. The numbers for each position per shift are additive. For example, Table 16.13.1-1 requires a total of 5 SROs per shift (3 SROs required by 10 CFR 50.54(m)(2)(i) plus 1 additional SRO for the Fire Brigade and 1 additional SRO for the ERO). The bases for the numbers in the first column of SLC Table 16.13.1-1 are as follows:

1 OSM (active SRO)	Required by 50.54(m)(2)(ii) (implemented by OMP).
1 STA (active or inactive SRO)	Required by ITS 5.2.2.g which indicates the individual fulfilling the STA position is the Shift Work Manager (implemented by OMP). Revision 50 to OMP 2-1 renamed the person fulfilling this position an STA. Note that pre-conversion TS Table 6.1-1, which implemented NUREG-0737 requirements, did not require an STA on shift when no units were in MODES 1-4. The SLC Table is more restrictive in that it requires an STA on shift at all times.
3 SRO's (active SRO)	Required by 10 CFR 50.54(m)(2)(i). Per ITS 5.2.2.b and 10 CFR 50.54(m)(2)(iii) at least 2 SRO's must be in the control room.
1 SRO (active or inactive) or NLO - Fire Brigade	Implemented by OMP and NSD. Individual fulfilling position shall be a SRO or an NLO who is qualified to be a fire brigade leader. Per OMP this individual functions as fire brigade leader and is not available for control room activities when directing the fire brigade. NFPA 805 does not specify that the brigade leader be an SRO, it only specifies that the fire brigade leader and at least two brigade members have sufficient training and knowledge of nuclear safety systems to understand the effects of fire and fire suppressants on nuclear safety performance criteria. When an NLO is serving as

	the fire brigade leader, the SRO number for each column in Table 16.13.1-1 may be reduced by one.
1 SRO (licensed or previously licensed) - ERO	Required by Volume A, Section B, Figure B-2 of the Emergency Plan. Implemented by OMP. SRO serves as the offsite communicator and the NRC communicator in the CR/TSC. This is permissible since the offsite communicator role is completed prior to the NRC communicator role starting.
1 SRO during CORE ALTERATIONS	Number of SROs in Table is increased by one for each unit performing CORE ALTERATIONS per SLC 16.13.1.a.2.
5 RO's	Required by 10 CFR 50.54(m)(2)(i).
1 RO - SSF	Required by ITS 5.2.2.h, implemented by OMP. Per ITS 5.2.2.h, the manpower necessary to operate the SSF will be exclusive of the fire brigade and the minimum operating shift that is required to be present in the Control Room. ITS 5.2.2.b and10 CFR 50.54(m)(2)(iii) require 3 of the 5 RO's required by 10 CFR 50.54(m)(2)(i) to be present in the control room when fuel is in the reactor. When all three units are in MODES 1-3, one RO per unit must be available to be dispatched to the SSF. Since 3 RO's must be present in the Control Room only two are available to dispatch to the SSF. Therefore, one additional RO, beyond what is required by 10 CFR 50.54(m)(2)(i), is required.
1 RO - ADV	Amendment 314, 314, 314 requires that staffing level be increased by an additional RO beyond what is required in Table 16.13.1-1 when in Condition B of ITS 3.5.2. The additional RO is designated to respond to an event requiring activation of the SSF for the unit operating under ITS 3.5.2 Condition B. The additional RO role may be fulfilled by an SRO as long as the SRO is not being counted towards the number of required SROs listed in Table 16.13.1-1 and is qualified to tasks involving operation of the SSF systems.

	When all three units are in MODES 1-4, a total of seven ROs are required; five per 10 CFR 50.54(m)(2)(I), one per ITS 5.2.2.h, and one per ITS 3.5.2 Condition B.
8 NLO's	Required by ITS 5.2.2.a, Volume A, Appendix 8, Spill Prevention and Control and Counter Measures Plan, Revision 98-04, 10/98 of the Emergency Plan, and Volume A, Section B, Figure B-8 of the Emergency Plan. Implemented by OMP. (Four for fire brigade, one NLO per Unit to complete critical AP and EOP actions and one for SSF equipment verification for the design basis fire.) When an NLO is serving as the fire brigade leader, the NLO number for each column in Table 16.13.1-1 must be increased by one or one fire brigade member must be supplied from another organization. The number of NLOs that are fire brigade qualified may be reduced provided that a like number of fire brigade qualified personnel are provided from other organizations. This does not change the total number of NLOs required; only the number required to be fire brigade qualified.
2 NLO's – ADV	License Amendment 314, 314, 314 requires that staffing levels be increased by an additional two NLO's beyond those required in Table 16.13.1-1 when in Condition B of ITS 3.5.2. The additional NLO's are designated for the purpose of operating the Atmospheric Dump Valves (ADVs) for the unit under ITS 3.5.2 Condition B. In addition, the NLO's with the responsibility for operating the ADVs will be designated to respond to the control room within five minutes and will not be given duties that will prevent this from happening.
7 SPOC	Required by Volume A, Section B, Figure B-8 of the Emergency Plan and the Fire Plan (Volume A, Appendix 8, Spill Prevention and Control and Counter Measures Plan, Revision 98-04, 10/98). Implemented by OMP 1-7 and NSD 112. Consists of two I&E technicians ERO qualified and knowledgeable of IP/0/A0050/003 (Power SSF Submersible Pump), two MM technicians ERO

qualified and knowledgeable of MP/0/A/1300/059 (Install SSF Submersible Pump), one supervisor or temporary supervisor qualified to establish the OSC and perform the OSC Maintenance Supervisor functions, and one additional person to help with pump installation as directed by SPOC supplied by one of the following groups in the order listed: SPOC, other maintenance personnel onsite, C&F, Chemistry, RP and Maintenance Overtime resources. Security will automatically supply one Security Guard to open doors and gates who will also assist with any maintenance activities to be performed. The Security Guard is counted as one of a total of 6 people needed to install the submersible pump. One other person is needed to establish the OSC for a total of 7. In the event of a fire, SPOC will respond to the fire until directed to install the submersible pump. A total of 5 SPOC personnel are assigned to the fire brigade. Per PIP 4-O99-2987 problem evaluation, it is acceptable to consider these additional 5 Fire Brigade members to be available for other duties, such as installation of the SSF pump. This is based on Oconee Fire Brigade Guide #2, which contains guidance that allows fire brigade members to be released from the brigade for operational needs at the discretion of the OSC/TSC.

The number of SPOC personnel qualified as fire brigade members may be reduced, provided that the qualified fire brigade members from other organizations are increased by a like number. This does not change the total number of SPOC personnel required, only the number required to be fire brigade qualified.

1 Chemistry Technician - ERO

Required by Volume A, Section B, Figure B-8 of the Emergency Plan. Implemented by OMP and Station Chemistry Manual 2.6. A Chemistry Technician who is fire brigade qualified may be credited toward fulfilling the ERO requirement and the fire brigade requirement. In the event of a fire, the Chemistry technician will respond to the fire until directed otherwise.

3 RP Technicians	Three are required by Volume A, Section B, Figure B-8 of the Emergency Plan. One is required by ITS 5.2.2.d and may be counted towards fulfilling the ERO requirement. Implemented by HP/0/B/1000/054. RP technicians who are fire brigade qualified may be credited toward fulfilling the ERO and TS requirements and the fire brigade requirement. In the event of a fire, the RP technician will respond to the fire until directed otherwise.

Minimum Station Staffing numbers for the SRO and RO positions in Table 16.13.1-1 change as a function of the number of units in MODES 1-4 and whether the operating Units are controlled from one or two Control Rooms. The number for the remaining positions in Table 16.13.1-1 is not affected by operational condition of the units.

- 10 CFR 50.54(m)(2)(i) requires 3 SROs when two units are in MODES 1-4 and controlled from two Control Rooms, 2 SROs when two units are in MODES 1-4 and controlled from a common control room, 2 SROs when one unit is MODES 1-4 and 1 SRO when no units are MODES 1-4. Thus considering fire brigade and ERO requirements, this results in the requirement for 5 SROs when two units are in MODES 1-4 and controlled from two Control Rooms, 4 SROs when two units are in MODES 1-4 and controlled from a common control room, 4 SROs when one unit is MODES 1-4 and 3 SROs when no units are MODES 1-4.

- 10 CFR 50.54(m)(2)(i) requires 5 ROs when two units are in MODES 1-4 and controlled from two Control Rooms, 4 ROs when two units are in MODES 1-4 and controlled from a common control room, 4 ROs when one unit is MODES 1-4 and 3 ROs when no units are MODES 1-4. OMPs require 2 ROs to man the SSF when two units are in MODES 1-3 and 1 RO when one unit is MODES 1-3. None are required when no units are in MODES 1-3. Therefore, no additional RO's are required beyond what is required by 10 CFR 50.54(m)(2)(i) when less than three units are in MODES 1-3 with one exception. When two units are in MODES 1-3 and controlled from one Control Room one additional RO is required since 10 CFR 50.54(m)(2)(i) only requires 4 RO's when the two operating units (Units 1 and 2) are controlled from one control room. Since one RO (or SRO) must be present in the Control Room when fuel is in the reactor vessel, the two RO's required to man the SSF for the operating units are exclusive of the one RO required for each unit. Therefore, a total of 5 RO's are required for this configuration.

The minimum staffing number for the SPOC and NLO positions is reduced by one when all three units are in MODE 4 or below. This reduction is allowed since the SSF is not required to be OPERABLE in these MODES. Therefore, there is no need for SPOC to provide a qualified individual to establish the OSC and no need for an NLO to perform SSF equipment verification.

SLC 16.13.1.a.1 requires at least one RO per unit to be present in the control room when fuel is in the reactor and one SRO to be present in the control room while in MODES 1-4. This

requirement is based on 10 CFR 50.54(m)(2)(iii) and ITS 5.2.2.b. The first part of SLC 16.13.1.a.2, which requires at least one licensed operator to be in the reactor building when fuel handling operations in the reactor building were in progress, was relocated during the ITS conversion from TS Table 6.1-1, Additional Requirement 3. This requirement has existed since the initial issuance of Oconee Technical Specifications. The second part of SLC 16.13.a.2, which requires that a SRO or an SRO limited to fuel handling activities be present to directly supervise CORE ALTERATIONS including fuel loading or transfer and be assigned no other duties, is based on 10 CFR 50.54(m)(2)(iv). SLC 16.13.1.a.3 which requires an operator, in addition to those specified in ITS 5.2.2.b to supplement the control room staff if the computer for a reactor is inoperable for more than eight hours, was relocated during the ITS conversion from TS Table 6.1-1, Additional Requirement 6. This requirement has also existed since the initial issuance of Oconee Technical Specifications. SLC 16.13.1.b, which specifies the STA shall be an experienced SRO was relocated during the ITS conversion from TS 6.1.1.9.

The primary purpose of the Fire Protection Program is to minimize both the probability and consequences of postulated fires. Despite designed active and passive Fire Protection Systems installed throughout the plant, a properly trained and equipped Fire Brigade organization of at least ten (Reference 8) members is needed to provide immediate response to fires that may occur at the site. This number is the result of a corrective action from Reference 10. This Fire Brigade requirement is normally met by using one SRO (or NLO qualified to be a fire brigade leader), 4 NLOs, and 5 SPOC personnel. However, this requirement can also be met by using personnel from other organizations (e.g., Chemistry, Radiation Protection, and Security).

Fire Brigade equipment and training conform to Oconee's commitments to Appendix A to Branch Technical Position 9.5-l and supplemental NRC Staff guidelines including Nuclear Plant Functional Responsibilities, Administrative Controls and Quality Assurance.

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

The following requirement was relocated from the TS 6.1.1.8 during the conversion to ITS. A training program for the fire brigade shall meet or exceed the requirements of Section 27 of the NFPA Code-1975, except that training sessions may be held quarterly.

ACTIONS

A.1

With the requirements for minimum station staffing not met, the minimum station staffing levels shall be restored within 2 hours. The 2 hour Completion Time is consistent with ITS 5.2.2.c and d which allows 2 hours to accommodate unexpected absence of on-duty shift crew members provided that immediate action is taken to restore the shift crew composition to within the minimum requirements.

REFERENCES:

1. Oconee UFSAR, Chapter 9.5.1.
2. Oconee Fire Protection SER dated August 11, 1978.
3. Oconee Fire Protection Review, (currently contained in the Fire Protection DBD) as revised.
4. Duke letter of January 16, 1978 to NRC in response to "Nuclear Plant Functional Responsibilities, Administrative Controls, and Quality Assurance".
5. ITS 5.2.2, Amendment 300/300/300.
6. 10 CFR 50.54(m).
7. Emergency Plan, Volume A, Section B, Figure B-8, Revision 97-01, 7/97.
8. Emergency Plan, Volume A, Appendix 8, Spill Prevention and Control and Counter Measures Plan, Revision 98-04, 10/98.
9. Station Chemistry Manual 2.6.
10. Problem Investigation Report Serial No. 1-089-0001.
11. Problem Investigation Process (PIP) Serial No. 4-O99-2987.
12. ITS 3.5.2, Amendment 314/314/314.
13. NRC Regulatory Issue Summary (RIS) 2002-16, "Current Incident Response Issues."
14. PIP O-03-0233
15. NOTICE OF VIOLATION AND CONFIRMATORY ORDER RELATED TO A FIRE PROTECTION PROGRAM LICENSE CONDITION (OCONEE NUCLEAR STATION, UNITS 1, 2, AND 3), Roy P. Zimmerman, Director, Office of Enforcement, NRC to Scott L. Batson, Site Vice President, Oconee Nuclear Station, dated July 1, 2013.