

Oconee Nuclear Station
Selected Licensee Commitments
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16.7 INSTRUMENTATION

16.7.3 Emergency Feedwater System - Low Level Initiation

COMMITMENT

Automatic low level initiation of both MDEFW pumps shall be operable

APPLICABILITY: RCS Tave > 250°F (*)

ACTION:

If one or both channel(s) are inoperable, the channels shall be restored to operable status within 7 days or a written report shall be submitted to the NRC within the next 30 days. The report shall outline the cause of the inoperability and the plans to restore the channels to operable status. The 30 day time limit shall start at the end of the 7 day period.

SURVEILLANCE:

Perform a CHANNEL CALIBRATION each refueling.

BASES:

The Steam Generator Level Control System (SGLCS) receives four OTSG level signals. Each train receives one signal from each OTSG (OTSG A & B Level to Train A and the same to Train B). These level signals are used to start the MDEFWPs upon 2 out of 2 low level in either OTSG. A level signal indicating below the initiation setpoint or failed low is considered to be operable.

The most limiting transient for the EFW system is the Loss of Main Feedwater (LMFW), (Ref. FSAR Section 10.4.7). The primary success path to mitigate the LMFW includes initiation of the EFW system. The FSAR evaluation credits automatic initiation of EFW on loss of both main feedwater pumps as sensed by low hydraulic oil pressure or low feedwater header pressure. In addition, for plant conditions in which automatic initiation circuitry must be disabled (ie. turbine header pressure < 850 psig) adequate time is available for manual initiation of EFW. Thus, initiation of EFW on low OTSG level is not credited for any DBA or transient. EFW initiation on low OTSG level has been included as a SLC in response to GL 89-19 and USI A-47 and provides additional protection from OTSG dryout.

16.7.3 (continued)

EFW initiation on low OTSG level is applicable above 250°F consistent with the requirements of TS 3.4 for EFW, although is not required for operability of the EFW system.

In order to provide additional protection from OTSG dryout, RCS temperature may not be increased above 250°F with low level initiation of MDEFW inoperable. However, if the Unit is above 250°F shutdown is not required since low level initiation is not credited for any DBA or transient.

(*) Implementation of this SLC is required following implementation and testing of the modification.

REFERENCES:

- 1) Generic Letter 89-19, Safety Implication of Control Systems

STATION MANAGER APPROVAL *HR Bauer* DATE 9-19-91

FIRE PROTECTION SYSTEMS

16.9.2 SPRINKLER AND SPRAY SYSTEMS

COMMITMENT

Sprinkler and Spray Systems in safety related areas listed in Table 16.9-2 shall be OPERABLE.

APPLICABILITY: Whenever equipment protected by the Sprinkler or Spray System is required to be OPERABLE.

ACTION:

- a. If a Sprinkler or Spray System is determined to be inoperable, the following corrective action shall be taken:
 - i. With no operable fire detection in the area, a continuous fire watch with backup fire suppression equipment shall be established in the area within 1 hour.
 - ii. With operable fire detection in the area, a hourly fire watch with backup fire suppression equipment shall be established in the area within 1 hour.
 - iii. Operation under these action statements is not reportable under Technical Specification 6.6.2.1.

SURVEILLANCE:

- a. Each of the Sprinkler and Spray Systems listed in Table 16.9-2 shall be documented operable as follows:
 - i. Annually, each system, shall be functionally tested, except in the cable spreading rooms, equipment rooms, and cable shafts.
 - ii. Annually, the sprinkler system spray headers and nozzles, shall be inspected.
 - iii. During refueling, a visual inspection of each nozzle's spray area shall be conducted to verify the spray pattern is not obstructed.

BASES:

The OPERABILITY of the Fire Suppression System ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where safety-related equipment is located. The Fire Suppression Systems consist of the water system, spray and/or sprinklers, Keowee CO₂ System and fire hose stations. The collective capability of the Fire Suppression Systems is a major element in the facility fire protection program.

During periods of time when the Sprinkler or Spray system is not operable and detection instrumentation is operable, a hourly fire watch patrol will be required to inspect the affected area frequently as a precaution. If the sprinkler or spray system in the area is not operable and no detection instrumentation is operable, a continuous fire watch is required to be maintained in the vicinity of the affected sprinkler or spray system until the system is restored to operable status.

In the event that portions of the Fire Suppression Systems are inoperable, alternate backup fire-fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service.

The test requirements provide assurance that the minimum OPERABILITY requirements of the Fire Suppression Systems are met.

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 FSAR, Chapter 9.5-1.
- 2) Oconee Fire Protection SER dated August 11, 1978.
- 3) Oconee Fire Protection Review, as revised.
- 4) Oconee Plant Design Basis Specification for Fire Protection, as revised.

STATION MANAGER APPROVAL B.L. Pule / R. Swenigant DATE 11/10/94

Table 16.9-2

Sprinkler and Spray Systems

a. Oconee Nuclear Station

- | | | |
|------|--------------------------------------|------------------------------|
| i. | Turbine Driven
Emergency FDW Pump | Units 1, 2, and 3 |
| ii. | Transformers | CT-1, CT-2, CT-3, CT-4, CT-5 |
| iii. | Cable Room | Units 1, 2, and 3 |
| iv. | Equipment Room | Units 1, 2, and 3 |
| v. | Cable Shaft
(3rd Level) | Units 1, 2, and 3 |
| vi. | Cable Shaft
(4th & 5th Level) | Units 1, 2, and 3 |

b. Keowee Hydro Station

- | | |
|-----|----------------------------|
| i. | Main Lube Oil Storage Room |
| ii. | Main Transformer |

FIRE PROTECTION SYSTEMS16.9.3 Keowee CO₂ SYSTEMSCOMMITMENT

The automatic CO₂ System provided for the generators at Keowee Hydro Station shall be OPERABLE.

APPLICABILITY: Whenever equipment protected by the Keowee CO₂ System is required to be OPERABLE.

ACTION:

If the Keowee CO₂ System is determined to be inoperable the following corrective action shall be taken:

- a. A continuous fire watch with backup fire suppression equipment shall be established in the area within 1 hour.
- b. Operation under this action statement is to be in a degraded mode and thus is not reportable under Technical specification 6.6.2.1.

SURVEILLANCE:

- a. The high pressure CO₂ System for the generators at the Keowee Hydro Station shall be demonstrated operable as follows:
 - i. Monthly, each valve in the flow path shall be verified to be in its correct position.
 - ii. Semiannually, the CO₂ storage tank weight shall be verified to be at least 90% of the full charge weight.
 - iii. On a refueling frequency, the system shall be verified to actuate manually and automatically, upon receipt of a simulated action signal.
 - iv. On a refueling frequency, a flow test shall be performed through headers and nozzles to assure no blockage.

BASES:

The OPERABILITY of the Fire Suppression System ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where safety-related equipment is located. The Fire Suppression System consists of the water system, spray and/or sprinklers, Keowee CO₂ System and fire hose stations. The collective capability of the Fire Suppression Systems is adequate to minimize potential damage to safety-related equipment and is a major element in the facility fire protection program.

In the event that portions of the Fire Suppression Systems are inoperable, alternate backup fire-fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service.

The Testing Requirements provide assurance that the minimum OPERABILITY requirements of the Fire Suppression Systems are met.

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 FSAR, Chapter 9.5-1.
- 2) Oconee Fire Protection SER dated August 11, 1978.
- 3) Oconee Fire Protection Review, as revised.
- 4) Oconee Plant Design Basis Specification for Fire Protection, as revised.

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