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Revised 8/10/99 2nd ed

SUBJECT: Forwards revs to Oconee Selected Licensee Commitments (SLC) Manual, per 10CFR50.4 & 50.71. SLC will be updated as necessary throughout yr, instead of being updated with annual UFSAR update.

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TITLE: OR Submittal: Updated FSAR (50.71) and Amendments

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W. R. McCollum, Jr.
Vice President

May 11, 1999

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

Subject: Oconee Nuclear Station
Docket 50-269, -270, -287
Selected Licensee Commitments Manual (SLC)

Gentlemen:

Pursuant to 10CFR 50.4 and 50.71, please find attached 7 copies of the latest revisions to the Oconee Selected Licensee Commitments Manual (SLC). The SLC Manual is Chapter 16.0 of the Oconee Updated Final Safety Analysis Report (UFSAR). This manual is intended to contain commitments and other station issues that warrant higher control, but are not appropriate for inclusion into the Technical Specifications (TS). Instead of being updated with the annual UFSAR Update, the SLC Manual will be updated as necessary throughout the year.

Very truly yours,

W. R. McCollum, Jr.
Vice President
Oconee Nuclear Station

CMB/cmb
Attachment

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U. S. Nuclear Regulatory Commission
Document Control Desk
May 11, 1999
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Bxc: ELL

May 11, 1999

To: Manual Holders

Subject: Oconee Selected Licensee Commitments Manual (SLC) Revision

On May 6, 1999, Station Management approved SLC 16.5-2 and SLC 16.5.13 for implementation beginning on May 11, 1999, concurrent with implementation of TS Amendment 302. SLC 16.5.2 LTOP, is revised by relocating revised LTOP commitments to the TS Bases 3.4.12 LCO Section. SLC 16.5.13, HPI and the Chemical Addition Systems, is revised to reflect the TS Amendment 302 change in minimum RCS temperature from 75 F to 60 F.

Please revise your SLC manual according to instructions below.

Remove these pages

LOEP 1 ✓
LOEP 2 ✓
SLC 16.5.2-1 ✓
SLC 16.5.2-2 ✓
SLC 16.5.2-3 ✓
SLC 16.5.2-4 ✓
SLC 16.5.2-5 ✓
SLC 16.5.13-2 ✓

Insert these pages

LOEP 1 ✓
LOEP 2 ✓
SLC 16.5.2-1 ✓
SLC 16.5.2-2 ✓
SLC 16.5.2-3 ✓

SLC 16.5.13-2 ✓

Any questions concerning this revision may be directed to Bob Douglas at 864-885-3073.

Regulatory Compliance
By: Conice Breazeale
Regulatory Compliance

Oconee Nuclear Station
Selected Licensee Commitments
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16.5 REACTOR COOLANT SYSTEM (RCS)

16.5.2 Low Temperature Overpressure Protection System

COMMITMENT

The following controls are required to meet the provisions of ITS 3.4.12:

a. RCS pressure:

< 345 psig when RCS temp \leq 220°F, and
< 450 psig when RCS temp > 220°F and \leq 325°F.

b. Pressurizer level maintained within the following limits when RCS pressure is > 100 psig:

\leq 220 inches when RCS temp \leq 220°F, and
< 260 inches when RCS temp > 220°F and \leq 325°F.

c. Pressurizer level maintained within the following limits when RCS pressure is \leq 100 psig:

\leq 310 inches when one or more HPI pumps are running, and when RCS temp \geq 150°F and \leq 220°F, and
 \leq 380 inches when RCS temp \leq 160°F and no HPI pumps are running.

d. Makeup flow restricted with HP-120 travel stops to:

Units 1 & 2 \leq 102.3 gpm

Unit 3 \leq 84.5 gpm.

e. Three audible Pressurizer level alarms \geq 225 inches, \geq 260 inches, and \geq 315 inches from the temperature compensated Pressurizer level indication.

f. Two audible RCS pressure alarms \geq 345 psig and \geq 450 psig.

g. High pressure nitrogen system administratively controlled to prevent inadvertent pressurization of the RCS.

APPLICABILITY:

MODE 3 when any RCS cold leg temperature is \leq 325°F,
MODES 4, 5, and 6 when an RCS vent path capable of mitigating the most limiting LTOP event is not open.

Low Temperature Overpressure Protection System
16.5.2

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more controls not met.	A.1 Enter applicable Condition of ITS 3.4.12.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 16.5.2.1 Verify travel stops limit flow through HP-120 to the specified limit.	18 months
SR 16.5.2.2 Perform Channel Calibration on pressurizer level and RCS pressure alarms.	18 months
SR 16.5.2.3 Perform an inspection of the PORV.	every 2 refueling cycles

Low Temperature Overpressure Protection System
16.5.2

SURVEILLANCE	FREQUENCY
<p>SR 16.5.2.4 -----NOTE----- Only required to be met when vent(s) are being used for overpressure protection. -----</p> <p>Verify valves in the flowpath for the RCS vent(s) are open.</p>	<p>12 hours for valves not locked, sealed, or otherwise secured open</p> <p><u>AND</u></p> <p>31 days for valves locked, sealed, or otherwise secured open</p>

BASES

BACKGROUND

The requirement(s) of Surveillance Requirement SR 16.5.2.3 and SR 16.5.2.4 were relocated from the CTS 4.2.6.c and 4.2.7 during the conversion to ITS. The Low Temperature Overpressure Protection (LTOP) System protects the reactor vessel against damage due to excessive pressures at low temperatures by limiting the pressure of transients to below the limits of 10 CFR 50 Appendix G using a conservative safety factor of 1.5. The first train of the LTOP system is the PORV. The second LTOP train is comprised of the controls which assure that 10 minutes are available for operator action to mitigate an LTOP event. This SLC is provided to establish the requirements for operability of the second train of the system in accordance with ITS 3.4.12.

APPLICABLE SAFETY ANALYSIS

Analysis of LTOP events are described in Section 5.2 of the UFSAR. Scenarios having the potential to result in a LTOP event are described in the bases for ITS 3.4.12. The inadvertent addition of nitrogen has also been identified as a potential LTOP event.

SLCs

The requirements of the SLC have been provided to assure 10 minutes are available for operator action to mitigate an LTOP event.

APPLICABILITY

The SLC is applicable when the provisions of ITS 3.4.12 are applicable. The value for RCS temperature is based on analyses used to develop the 10CFR50 Appendix G pressure temperature limits using a safety factor of 1.5. This limit is provided in ITS Figures 3.4.12-3, 3.4.12-6, and 3.4.12-9, the Inservice Leak and Hydrostatic Test heatup and cooldown limitations applicable for the first 21 EFPY for Units 1 and 3 and for the first 19 EFPY for Unit 2. This SLC is not applicable for operating conditions above 325°F since the possibility of non-ductile failure is significantly diminished. Vent paths capable of mitigating the most limiting LTOP event are specified in Operations procedures. If an LTOP event were to occur, violation of this SLC could result in exceeding the brittle fracture pressure limits, overstressing the reactor vessel and closure head, or require reanalysis to demonstrate the resulting stresses would not impair further operation.

ACTIONS

A.1

If one or more of the restrictions in the SLC is not met, 10 minutes will not be available for operators to mitigate potential LTOP events. In addition, if the requirements for deactivation of the HPI System and CFTs are not met, the PORV may not have sufficient relief capacity to mitigate the associated LTOP events. The Completion Time of "Immediately" simply requires that there be no

delay in implementing the requirements of ITS 3.4.12. ITS 3.4.12 requires that compensatory measures be established within four hours to monitor for initiation of an LTOP event; or within 12 hours the RCS will be depressurized and a vent path capable of mitigating the most limiting LTOP event shall be opened. The compensatory measures must be sufficient to identify and mitigate potential LTOP events promptly. For example, establishing a dedicated LTOP operator will in many cases be an adequate compensatory measure.

SURVEILLANCE REQUIREMENTS

The identified surveillance requirements are provided to assure that the second train of LTOP is functioning properly and gives the operator 10 minutes to mitigate an LTOP event.

REFERENCES:

1. ITS 3.4.12
2. 10 CFR 50 Appendix G "Fracture Toughness Requirements."
3. Calc. File OSC-5355 "Revision of Unit 1, 2, and 3 LTOP Operations Restrictions for 21.0, 19.0, and 21.0 EFPY Brittle Fracture Limits, Respectively: Issued June 9, 1993.

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 16.5.13.1 Verify boron concentration in CBAST is within the limit specified in the COLR.	7 days

BASES

The requirement(s) of this SLC section were relocated from CTS 3.2 and Table 4.1-3, Item 6 during the conversion to ITS.

One source per unit of concentrated soluble boric acid in addition to the borated water storage tank is available and OPERABLE.

This source shall be the concentrated boric acid storage tank (CBAST). The CBAST is OPERABLE when volume and boron concentration are within the limits of the Core Operating Limits Report (COLR) with a temperature at least 10°F above the crystallization temperature. System piping and valves necessary to establish a flow path from the tank to the high pressure injection system shall be OPERABLE and shall have the same temperature requirement as the CBAST. At least one channel of heat tracing capable of meeting the above temperature requirement shall be in operation. One associated boric acid pump shall be OPERABLE.

The high pressure injection system and chemical addition system provide control of the reactor coolant system boron concentration. This is normally accomplished by using any of the three high pressure injection pumps in series with a boric acid pump associated with either the boric acid mix tank or the CBAST or a bleed transfer pump aligned to take suction from the CBAST. The boric acid pump associated with the CBAST is normally used for small additions during operation and the bleed transfer pumps are utilized when larger volumes are to be added. An alternate method of boration will be the use of the high pressure injection pumps taking suction directly from the borated water storage tank (BWST). Part a to the commitment is relocated from CTS 3.2.2 for completeness (i.e., verbatim relocation). The requirement for two HPI pumps except as specified in ITS 3.5.2 establishes no additional requirements other than those specified in ITS 3.5.2. Compliance with ITS 3.5.2 (LCO and ACTIONS) for HPI pumps establishes compliance with this SLC for commitment part a.

The quantity of boric acid in storage in the CBAST or the BWST is sufficient to borate the reactor coolant system to a 1% $\Delta k/k$ subcritical margin at 70°F with the maximum worth stuck rod and no credit for xenon at the worst time in core life. The current cycles for each unit are analyzed with the limits presented in the COLR. The cycle specific analyses determine the volume and boron concentration requirements for the BWST and CBAST necessary to borate to a cold shutdown condition (MODE 5). The volume requirements include a 10%