

# CATEGORY 1

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                                  Document Control Branch (Document Control Desk)

*Revised 10/17/98 [Signature] rev'd*

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 w/annual UFSAR update.

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

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May 6, 1998

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. The SLC Manual is Chapter 16.0 of the Oconee 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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Regional Administrator, Region II

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AD53

9806010204 980506  
PDR ADOCK 05000269  
P PDR

May 6, 1998

To: Manual Holders

Subject: Oconee SLC Revision

Please revise your SLC Manual according to instructions. SLC 16.9.7 has been revised to reflect the new licensing basis for the Unit 2 Service Water System, while retaining the existing licensing basis for the Units 1 and 3 Service Water Systems. SLC 16.9.8 has also been revised to exclude consideration of Unit 2, since the High Pressure Service Water (HPSW) System is not credited for the safe shutdown function support for the upgraded Unit 2 Service Water System.

Please update your copy of this manual as follows:

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Any questions concerning this revision may be directed to David Nix 864-885-3634.

Regulatory Compliance

By: Conice Breazeale  
Regulatory Compliance

\*This LOEP page corrects a previous transmittal and is not related to this SLC change.

Oconee Nuclear Station  
Selected Licensee Commitments  
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16.9 AUXILIARY SYSTEMS

16.9.7 KEOWEE LAKE LEVEL

COMMITMENT

Ensure the proper requirements are met for the following Lake Keowee level ranges.

APPLICABILITY: Maintain level to ensure operability of specified systems and/or components.

NOTE: An instrument error of  $\pm 1.15$  ft has been applied to lake levels identified in this SLC. This is based on hydrogauge digital counter reading or computer points being used to verify level. Absolute lake level can be determined at the Keowee Hydro intake structure. Levels identified as (abs) are absolute values without instrument error included.

LAKE LEVEL	REQUIRED ACTION	REQUIRED ACTION NOT MET
A. All Lake Levels	A.1 Verify availability of the EWST and HPSW-25 to supply flow to the CCW Pumps,  or  Verify lake level $>$ minimum level required for <u>gravity</u> (non-siphon) flow per Table 16.9-7.	A.1.1 If the EWST or HPSW-25 are unavailable and lake level $<$ minimum level for gravity flow per Table 16.9-7, then LPSW is inoperable. Enter Tech. Spec. 3.0.
B. Lake Level $<$ 801.15 ft. (800.0 abs)	B.1 Verify at least two sources of CCW <u>siphon</u> flow are available to the LPSW pumps suction by operating 3 CCW pumps each on at least two units (6 pumps total).  or  Verify lake level $>$ minimum level required for <u>gravity</u> (non-siphon) flow per Table 16.9-7.	B.1.1 If only one siphon source is available and lake level $<$ minimum level for gravity flow per Table 16.9-7, then enter a 72 hour LCO per T.S. 3.3.7.  B.1.2 If no siphon sources are available and lake level $<$ minimum level for gravity flow per Table 16.9-7, then LPSW is inoperable. Enter T.S. 3.0.
C. Lake level $<$ 794.15 ft. (793.0 abs)	C.1 Restore lake level to greater than 794.15.	C.1.1 The LPSW system cannot withstand a single failure. Enter a 72 hour LCO per T.S. 3.3.7.

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LAKE LEVEL	REQUIRED ACTION	REQUIRED ACTION NOT MET
D. Lake level <784.15 ft. (783.0 abs)	D.1 Declare the Keowee Oil Storage Room Water Spray System inoperable  <u>AND</u>  Refer to SLC 16.9.2 to establish the required firewatch.	D.1.1 Notify Regulatory Compliance of the need to meet the reporting requirements of SLC 16.9.2.
E. Lake level <781.15 ft. (780.00 abs)	E.1 To retain adequate water supply for 7 days emergency operation, stop Keowee generation to the grid	E.1.1 Notify the Plant Operations Review Committee (PORC) per NSD-308.  <u>AND</u>  Request plant operation (and reportability) guidance.
H. Lake Level < 780.60 ft. (779.45 abs)	H.1 Declare the Keowee Step-up Transformer <u>Mulsifyre</u> inoperable  <u>AND</u>  Refer to SLC 16.9.2 to establish required firewatch.	H.1.1 Notify Compliance of the need to meet the reporting requirements of SLC 16.9.2.

SURVEILLANCE: Keowee Lake Level shall be monitored once per shift.

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TABLE 16.9-7  
 MINIMUM LAKE LEVEL FOR GRAVITY FLOW TO LPSW PUMPS SUCTION

If Keowee lake level  $\geq$  minimum lake level in the following table, then gravity flow will provide adequate suction for the LPSW pumps without relying on the ECCW siphon:

Number of CCW Pump Discharge Valves Currently Open	Minimum Lake Level for Gravity Flow * (feet absolute)
1	803.91
2	800.64
3	799.70
4	799.22
5	798.93
6	798.72
7	798.56
8	798.44
9	798.33
10	798.25
11	798.18
12	798.11

\* Note: These lake levels are based on the assumption that all CCW crossover isolation valves (1CCW-40, 2CCW-41, 3CCW-42 and 3CCW-94) are open. If any of these valves are closed, contact Mechanical Systems Engineering to determine the minimum lake level for gravity flow.

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BASES:

The CCW system provides the source of water to the CCW crossover piping which supplies suction to the LPSW system. Normally, this crossover header is aligned to all three Oconee units, and CCW pumps provide adequate flow for the requirements of the LPSW systems for all 3 units. To meet the requirements of T.S. 3.3.7, the Emergency CCW (ECCW) system must be capable of supplying suction to the LPSW pumps in the event of a Loss of Off-site Power (LOOP). The ECCW supply to LPSW must be capable of withstanding a single active failure.

After a loss of power to the CCW pumps, the ECCW System is designed to supply suction to the LPSW pumps using an unassisted siphon. To maintain siphon flow capability, the ECCW piping must be relatively air-free and leak-tight. At high lake levels, gravity flow may be adequate to supply suction to the LPSW pumps without relying on the siphon.

To help maintain ECCW siphon flow capability, HPSW must supply seal water to the CCW pump shafts to prevent air inleakage that may defeat the siphon. The Elevated Water Storage Tank (EWST) through valve HPSW-25 provides the seal water necessary to the CCW pumps immediately following a LOOP (Refer to SLC 16.9.1 for HPSW pump requirements).

If the lake level is greater than 799.26 feet (798.11 abs), it may be possible to provide adequate suction pressure to the LPSW pumps due to gravity flow without dependance upon siphon flow. The minimum lake level for gravity flow depends on the number of open CCW pump discharge valves before and during the LOOP event. Since the CCW pump discharge valves remain as is after a LOOP event, the number of open CCW pump discharge valves during a LOOP is the same as the number of open CCW pump discharge valves before the LOOP event. Table 16.9-7 provides the minimum lake level for gravity flow as a function of the number of open CCW pump discharge valves.

With the lake level less than 801.15 feet, siphon flow capability must be established if gravity flow is not available. To ensure siphon capability will be established in the event forced flow is stopped, the CCW inlet piping from the intake structure to the CCW crossover must be maintained water-solid. Since the Continuous Vacuum Priming connections to the CCW inlet piping are normally isolated, the CCW piping is maintained water-solid by requiring a minimum number of CCW pumps operating on a given unit. "Water-solid" is defined as sufficient positive pressure to prevent gases from coming out of solution and sufficient flow to ensure accumulated gases will be swept away. The CCW flowpath is maintained water-solid by operating at least three CCW pumps on each Oconee unit being used as a siphon source.

Two siphon sources shall be capable of providing siphon flow to the LPSW pumps and the two siphon sources shall be from different units. A "siphon source" is defined as a water-solid flow path consisting of two 8 ft. CCW pump discharge valves open to a common 11 ft. CCW inlet header. Whenever 3 CCW pumps are operating on a given unit, siphon flow is assured only in the 11 ft. CCW inlet header being fed by the two pumps, because the 11 ft. CCW inlet header being fed by only one pump cannot be assured to be water-solid. Therefore, another unit with at least 3 CCW pumps operating is necessary to provide another siphon source.

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The failure of a siphon source is not postulated since the siphon sources contain no active components. Two siphon sources originating from different units is required to maintain adequate NPSH to each LPSW pump. If only one siphon source is available due to maintenance, testing, etc., then the LPSW System cannot withstand a single failure which causes the loss of an LPSW pump, and a 72 hour LCO shall be entered per T.S. 3.3.7. If a 72 hour LCO has been declared because lake level has fallen below 794.15 ft, then at least one siphon source must continue to be maintained to avoid entering T.S. 3.0.

With lake level below 794.15, calculations show that the LPSW pumps could experience inadequate NPSH with siphon flow if a single failure causes only the minimum number of LPSW pumps (one for Unit 3 or two for the shared Unit 1 and 2 systems) to be available during a design basis event. Therefore, the LPSW system must be considered unable to withstand a single failure for lake level below 794.15 and a 72 hour LCO must be entered per T.S. 3.3.7.

Should lake level fall below 784.15, the Keowee Oil Storage Room water spray system may not provide the required flowrates. For this reason, the spray system should be declared inoperable and the appropriate compensatory actions taken.

With lake level below 781.15, the water supply (for Keowee Hydro Station to provide emergency power to the overhead path at 46.5 MVA and the underground path at 22.35 MVA) could be inadequate for 7 days of continuous operation at these levels. Neither Keowee Hydro or Oconee Nuclear Station should be considered inoperable at this lake level. Keowee Hydro should not generate to the grid at lake levels below 781.15 in order to ensure ample water capacity for emergency power operation.

Should lake level fall below 780.60, the Keowee main Step-up Transformer Mulsifyre system may not provide the required flowrates. For this reason, the Mulsifyre should be declared inoperable and the appropriate compensatory actions taken.

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REFERENCES:

1. PIR 0-092-0535, Potential Insufficient NPSH for LPSW pumps
2. LER 269/93-04, Rev. 0 and Rev. 1
3. OSS-0254.00-00-1003, Rev. 7, Design Basis Specification for the CCW System
4. OSS-0254.00-00-1039, Rev. 4, Design Basis Specification for the LPSW System
5. Calculation OSC-2895, Rev. 4, Hydraulic Calculations for Keowee Deluge Systems
6. Calculation OSC-5325, Rev. 0, Keowee Lake Level Uncertainty Calculation
7. Calculation OSC-5304, Rev. 1, Minimum Lake Level for Radwaste Equipment Cooling System Isolation
8. Calculation OSC-5022, Rev. 1, USQ Evaluation for Operability Evaluation of PIR 0-092-0535
9. Calculation OSC-2280, Rev. 7, LPSW NPSH and Minimum Required Lake Level
10. Calculation OSC-5349, Rev. 1, Minimum Lake Level Required to Maintain Sufficient NPSH to the LPSW pumps via Gravity Flow
11. Calculation OSC-5670, Rev. 3, Required Number of CCW Intake Flow Paths
12. Calculation OSC-5461, Rev. 1, Isolation of the Continuous Vacuum Priming System to the CCW Intake Piping
13. Calculation OSC-5409, Rev. 3, Single Failure Analysis of the ECCW System Supply to the LPSW Supply
14. Calculation OSC-3528, Rev. 3, Keowee Lake Level Minimum Administrative Limits

STATION MANAGER APPROVAL

BL Peale / RL Singh DATE 2/29/96

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16.9 . AUXILIARY SYSTEMS

16.9.8 HPSW PUMP REQUIREMENT TO SUPPORT LPSW

COMMITMENT

Adequate suction to the LPSW Pumps requires water from the CCW system to be supplied. In order for water to be supplied to LPSW from CCW during a LOCA/LOOP, HPSW is required to support initial CCW siphon flow and subsequent CCW pump restart. This requires BOTH of the following conditions:

1. Two HPSW Pumps shall be operable and capable of restarting prior to complete drain of the Elevated Water Storage Tank (EWST), to provide sealing water for CCW Pump shafts to prevent loss of siphon flow and to provide cooling for the CCW Pump(s) after re-start of the CCW Pump(s).

AND EITHER

2.a. Elevated water storage tank with HPSW-25 functionally operable to provide sealing/cooling water for CCW Pumps.

OR

2.b. Minimum lake level to provide true gravity flow to the suction of the LPSW Pumps without dependency on siphon flow. (See SLC 16.9.7 )

APPLICABILITY:

Any time the LPSW system is required to be operable. Action statements apply to all three units.

ACTION:

a. If the HPSW Jockey Pump is unable to maintain EWST level or fill the EWST, it shall be declared out of service.

b. If any two HPSW Pumps (HPSWP "A", HPSWP "B", or Jockey Pump) are removed from service or inoperable, the LPSW system is not single failure proof. Enter a 72' hour LCO per Technical Specification 3.3.7.b.

c. If either of the two Unit 1 Main Feeder Busses is out of service or inoperable, then the LPSW system is not single failure proof. Enter a 72 hour LCO per Technical Specification 3.3.7.b.

d. If three HPSW Pumps (HPSWP "A", HPSWP "B", and Jockey Pump) are removed from service or inoperable at the same time, then the LPSW system is inoperable. Enter Technical Specification 3.0.

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e. If the EWST is out of service AND the lake level is not adequate to support gravity flow, then the LPSW system is inoperable. (NOTE: EWST is considered out of service if HPSW-25 is out of service or if in any way water cannot be supplied from the EWST via the sealing water path to CCW Pumps or if EWST level cannot be maintained > 70,000 gallons). Enter Technical Specification 3.0.

SURVEILLANCE:

Surveillance per SLC 16.9.1 and the Appendix B testing program is adequate to demonstrate the availability of the equipment and systems discussed here.

BASES:

The HPSW system provides support for the LPSW system suction, station fire suppression capability, back up service water to HPI Pump Motor and Bearing coolers, and back up service water to the TDEFW Pump Bearing and Oil coolers. HPSW system make-up demands are normally met by the HPSW Jockey Pump.

The HPSW system must provide upper guide bearing sealing and motor cooling to the CCW Pumps to ensure the CCW system can provide a suction supply to the LPSW system. Sealing is required any time the CCW system is in the siphon flow mode of operation. Cooling to the CCW Pump motors is required any time the CCW Pumps are required to operate.

At certain lake levels unassisted gravity flow may be possible. If so, the EWST is not required to support siphon flow by providing sealing of the CCW Pump Upper Guide Bearing to prevent some of the air inleakage that could defeat the ECCW siphon. However, HPSW is still required to support operation of the CCW Pumps since procedures require that the CCW pumps must be restarted following a LOCA/LOOP.

LPSW takes suction from the CCW crossover header. During certain analyzed accident conditions, a loss of power to the CCW Pumps for all three units must be assumed. This results in a loss of forced flow to the CCW crossover header. Initially, the sealing requirements are met via the EWST. The duration of the event may last beyond the capability of the inventory of the EWST. Therefore the HPSW Pumps must be capable of being started following a loss of power in order to meet the cooling and seal lubrication requirements of the CCW Pumps.

The HPSW Jockey Pump is supplied by "load shed" power and would not be available until after the load shed is reset. The CCW Design Basis Document (Section 20.1.1.3) requires a re-start of a CCW Pump within one and one half hours. The load shed must be reset to restart the CCW pump, thus the power would also be available to the Jockey Pump within that time frame. The Jockey Pump is of smaller capacity, would not meet fire protection capacity requirements, and would take longer to refill the EWST. Therefore, the Jockey Pump is considered as a substitute for an HPSW Pump only for purposes of

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supporting the siphon or the restart of a CCW Pump and not for Fire Protection.

The HPSW Jockey pump is of smaller capacity than HPSW pumps A and B. Calculation OSC-5945 "HPSW Pump and Fire Protection Flow Test Acceptance Criteria" calculates the accident loads and concludes the HPSW Jockey pump has sufficient capacity to supply those loads plus system leakage provided it is able to maintain EWST level or fill the EWST in normal usage. Accident loads plus system leakage are calculated to be approximately the same as normal loads plus normal system leakage.

All three HPSW pumps are powered from the Unit 1 Main Feeder Busses. Backup power to the Unit 1 Main Feeder Busses is not available from another unit. Therefore, if one of the two available Unit 1 Main Feeder Busses is removed from service, then the remaining HPSW pumps are vulnerable to a single failure of the other Unit 1 Main Feeder Bus. This would also result in LPSW not being single failure proof since HPSW is necessary for LPSW operation in the conditions described above. This condition would affect LPSW for all three units.

An EWST level of 70,000 gallons is chosen as the minimum level for EWST operability since this is the lowest level which would exist during normal daily operation. An EWST level of 70,000 gallons is the setpoint at which an HPSW pump in "base" would start to make up to the EWST. This situation would not be expected to occur during normal system operation since the HPSW Jockey pump is capable of maintaining EWST level at 100,000 gallons.

REFERENCES:

- 1) OSC-5409 Rev 3, " Single Failure Analysis of the ECCW System Supply to the LPSW System "
- 2) OSC-5349 Rev 1, " Minimum Lake Level Required to Maintain Sufficient NPSH to the LPSW Pumps via Gravity Flow "
- 3) OSC 5945 Rev 0, "HPSW Pump and Fire Protection Test Acceptance Criteria"
- 4) PIP 0-094-0952
- 5) PIP 0-094-0995
- 6) PIP 0-095-0307
- 7) PIP 0-095-0174
- 8) Oconee FSAR Sections 9.2.2, 9.5.1, 15.0, Table 9-4, Figure 9-9 through 9-12; 1994 Update
- 9) Technical Specifications 3.0, 3.3.7, 4.0.4, Table 4.1-2, as amended to 2/1/95.

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