



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
SUPPORTING AMENDMENT NO. <sup>146</sup> TO FACILITY OPERATING LICENSE NO. DPR-38  
AMENDMENT NO. <sup>146</sup> TO FACILITY OPERATING LICENSE NO. DPR-47  
AMENDMENT NO. <sup>143</sup> TO FACILITY OPERATING LICENSE NO. DPR-55

DUKE POWER COMPANY

OCONEE NUCLEAR STATION, UNITS NOS. 1, 2 AND 3

DOCKETS NOS. 50-269, 50-270 AND 50-287

1.0 Introduction

By letter dated October 8, 1984, Duke Power Company (the licensee) proposed changes to the Technical Specifications (TSs) of Facility Operating Licenses Nos. DPR-38, DPR-47 and DPR-55 for the Oconee Nuclear Station, Units Nos. 1, 2 and 3. These amendments would consist of changes to the Station's common TSs.

These amendments revise the TSs to reflect the administrative program which will include training of personnel, procedures for sampling and analysis, and provisions for maintenance of sampling and analysis equipment of systems (II.F.1.2 and II.B.3) undertaken as a result of NUREG-0737, TMJ Action Plan. These systems include the post-accident sampling (II.B.3) and sampling and analysis of plant effluents (II.F.1.2).

2.0 Background

In November 1980, the NRC staff issued NUREG-0737, "Clarification of TMJ Action Plan Requirements," which includes all TMJ Action Plan items approved by the Commission for implementation at nuclear power reactors. NUREG-0737 identifies those items for which TSs were scheduled for implementation after December 31, 1981. The staff provided guidance on the scope of TSs for all of these items in Generic Letter 83-37. Generic Letter 83-37 was issued to all Pressurized Water Reactor (PWR) licensees on November 1, 1983. In this Generic Letter, the staff requested licensees to:

1. Review their facility's TSs to determine if they were consistent with the guidance provided in the Generic Letter; and
2. Submit an application for license amendment where deviations or absence of TSs were found.

By letter dated October 8, 1984, the licensee submitted proposed TSs which address the request made in Generic Letter 83-37. This evaluation

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covers the following TMI Action Plan items:

1. Post-Accident Sampling (II.B.3);
2. Long Term Auxiliary Feedwater System Evaluation (II.E.1.1);
3. Sampling and Analysis of Plant Effluents (II.F.1.2).

For the remaining eight items in the licensee's submittal, we determined that we need additional information to complete our review, and it was requested by separate correspondence:

1. Reactor coolant system vents (II.B.1);
2. Noble gas effluent monitors (II.F.1.1);
3. Containment high-range monitors (II.F.1.3);
4. Containment pressure monitors (II.F.1.4);
5. Containment water level monitors (II.F.1.5);
6. Containment hydrogen monitors (II.F.1.6);
7. Control room habitability (III.D.3.4); and
8. Instrumentation for determination of inadequate core cooling (II.F.2).

### 3.0 Evaluation

#### 3.1 Post-Accident Sampling (II.B.3)

The generic letter states:

"Licensees should ensure that their plant has the capability to obtain and analyze reactor coolant and containment atmosphere samples under accident conditions. An administrative program should be established, implemented and maintained to ensure this capability. The program should include:

- a) training of personnel,
- b) procedures for sampling and analysis, and
- c) provisions for maintenance of sampling and analysis equipment.

It is acceptable to the staff, if the licensee elects to reference this program in the administrative controls section of the Technical Specifications and include a detailed description of the program in the plant operation manuals. A copy of the program should be easily available to the operating staff during accident and transient conditions."

The licensee responded by providing a proposed Technical Specification 6.4.3 as follows:

"6.4.3 The station shall have a program that ensures the capability to obtain and analyze reactor coolant and containment atmosphere samples under accident conditions which includes training of personnel, procedures for sampling and analysis, and provisions for testing and required maintenance of sampling and analysis equipment."

The licensee has stated that a program will be used. The NRC staff review and Safety Evaluation of the present procedure was issued to the licensee in a letter dated January 30, 1985. Thus, the licensee has provided a proposed administrative Technical Specification that satisfies the guidance in the Generic Letter and is, therefore, acceptable.

### 3.2 Long Term Auxiliary Feedwater System Evaluation (II.E.1.1)

The generic letter stated:

"The objective of this item is to improve the reliability and performance of the auxiliary feedwater (AFW) system. Technical Specifications depend on the results of the licensee's evaluation and staff review of each plant. The limiting conditions of operation (LCO) and surveillance requirements for the AFW system should be similar to safety-related systems. Typical generic Technical Specifications are provided in Enclosure 3. These specifications are for a plant which has three auxiliary feedwater pumps. Plant specific Technical Specifications could be established by using the generic Technical Specifications for the AFW system."

The licensee responded by stating:

"Existing Oconee Technical Specifications 3.4 and 4.9 effectively govern operability and surveillance of the emergency feedwater system. As such, no changes are deemed necessary."

Technical Specification 3.4 provides limiting conditions for operation for the auxiliary feedwater system, appropriate action statements and bases.

Technical Specification 4.9 provides the surveillance requirements.

The allowable time out-of-service for the turbine pump is 2.5 times longer than that suggested by the Generic Letter; however, the test frequency is twice as large.

The Technical Specification, which does not require the institution of alternate monitoring within 72 hours but requires more frequent testing, results in approximately the same unprotected time as that recommended by the NRC staff. Therefore, the Technical Specification is acceptable.

### 3.3 Sampling and Analysis of Plant Effluents (II.F.1.2)

The generic letter states:

"Each operating nuclear power reactor should have the capability to collect and analyze or measure representative samples of radioactive iodines and particulates in plant gaseous effluents during and following an accident. An administrative program should be established, implemented and maintained to ensure this capability. The program should include:

- a) training of personnel,
- b) procedures for sampling and analysis, and
- c) provisions for maintenance of sampling and analysis equipment.

It is acceptable to the staff, if the licensee elects to reference this program in the administrative controls section of the Technical Specifications and include a detailed description of the program in the plant operation manuals. A copy of the program should be readily available to the operating staff during accident and transient conditions."

In response, the licensee proposed Technical Specification 6.4.4 as follows:

"6.4.4 The stations shall have a program that ensures the capability to collect and analyze or measure representative samples of radioactive iodines and particulates in plant gaseous effluents during and following an accident which includes training of personnel, procedures for sampling and analysis, and provisions for testing and required maintenance of sampling and analysis equipment."

The licensee has stated that a program will be used. The nature of routine plant operations dictate that such a program be in place to demonstrate compliance with discharge limits. Accordingly, the proposed Technical Specification is acceptable to the NRC staff.

### 4.0 Environmental Consideration

These amendments involve a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. We have determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that these amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to

10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

#### 5.0 Conclusion

We have concluded, based on the considerations discussed above, that:  
(1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and  
(2) such activities will be conducted in compliance with the Commission's regulations and the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Dated: October 31, 1985

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