Duke Power Company Oconee Nuclear Station

Proposed Technical Specification Revision Reactor Vessel Surveillance Schedule

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4.2.4 The reactor vessel material irradiation surveillance specimens removed from Units 1, 2 and 3 reactor vessels in 1976 shall be installed, irradiated in and withdrawn from the Crystal River Unit 3 reactor vessel in accordance with the following capsule withdrawal schedule:

Sequence of Withdrawal	Target Purpose	
1	Highest $\Delta RT_{\begin{subarray}{c}NDT\end{subarray}}$ of encapsulated	
	material >50F	
2	Capsule fluence midway between first and third capsule	
. 3	Capsule fluence corresponds to that of the EOL fluence of the reactor vessel 1/4T location	
4	Capsule fluence corresponds to that of the EOL fluence of the reactor vessel inner surface location	
5 and 6	Standby; capsule fluence corresponds to not less than once nor greater than twice the EOL fluence of the reactor vessel inner surface location	

Capsule identification, position in the reactor vessel, and withdrawal time will be as stated in BAW-1543*. In the event this schedule cannot be adhered to, the NRC will be notified within 30 days and BAW-1543 will be revised accordingly.

Following withdrawal of each capsule in accordance with BAW-1543, Duke Power Company shall be responsible for testing the specimens and submitting a report of test results in accordance with 10 CFR 50, Appendix H.

^{*} BAW-1543, "Integrated Reactor Vessel Material Surveillance Program," a Babcock & Wilcox Report, prepared for the B&W Owners Group Materials Committee and submitted to the NRC.

Bases

The surveillance program has been developed to comply with the applicable edition of Section XI and addenda of the ASME Boiler and Pressure Vessel Code, Inservice Inspection of Nuclear Reactor Coolant Systems, as required by 10 CFR 50.55(a) to the extent practicable within limitations of design, geometry and materials of construction. The program places major emphasis on the area of highest stress concentrations and on areas where fast neutron irradiation might be sufficient to change material properties.

The number of reactor vessel specimens and the frequencies for removing and testing these specimens are provided to assure compliance with the requirements of Appendix H to $10\ \text{CFR}$ Part $50\$.

Duke Power Company Oconee Nuclear Station

Attachment 2

No Significant Hazards Consideration Evaluation

No Significant Hazards Consideration Evaluation

Duke Power Company (Duke) has made the determination that this amendment request involves a No Significant Hazards Consideration by applying the standards established by the Commission's regulations in 10 CFR 50.92. This ensures that operation of the facility in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of these standards by providing certain examples (48 FR 14870). Example (i) of the types of amendments considered not likely to involve significant hazards considerations is applicable to this amendment request. This specific example involves amendment requests that are considered to be purely administrative changes to the Technical Specifications—for example,

- (a) a change to achieve consistency throughout the technical specification; or
- (b) correction of an error; or
- (c) a change in nomenclature.

The proposed Technical Specifications amendment addressed in this submittal has been determined by Duke to be an administrative change. The proposed amendment reflects the new administrative process in which changes to Oconee's Reactor Vessel Surveillance Program (RVSP) will be handled in the future. The revisions to the Technical Specifications proposed to this submittal constitute a change in nomenclature.

The proposed revision to Specification 4.2.4 incorporates by reference, document BAW-1543, "Integrated Reactor Vessel Material Surveillance Program," which has been submitted for NRC review and approval by B&W letter dated March 14, 1984 to Mr. David Moran (NRC). BAW-1543 will be maintained current and will serve as the basis for the Surveillance Capsule Insertion and Withdrawal Schedule. By maintaining this document current, operational changes of any nature can be handled in a timely manner by administrative changes to the document. The NRC Staff will be notified of any need to change the schedule and any such changes will be technically reviewed by the NRC.

Due to the nature of the proposed change to Specification 4.2.4, it is considered unnecessary to maintain Table 4.2-1, nor is it necessary to retain Specification 4.2.5. The delution of these two items is a result of the new administrative process being implemented for Oconee's RVSP.

Duke has determined, based on the consideration that the requested amendment is administrative in nature, that the revisions do not involve a significant increase in the probability or consequences of accidents previously considered, nor create the possibility of a new of different kind of accident, and will not involve a significant decrease in a safety margin. Therefore, Duke concludes that there is no significant hazards condideration involved in this amendment request.