DUKE POWER COMPANY

OCONEE NUCLEAR STATION

ATTACHMENT 1

PROPOSED TECHNICAL SPECIFICATIONS

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3.1.13 Reactor Coolant System Vents

Specification

3.1.13.1 a. The following reactor coolant system vent paths shall be operable whenever the reactor coolant average temperature is above 250° F:

1) Reactor Vessel Head Vent
2) Pressurizer Steam Space Vent (through PORV)
3) RCS Loop A High Point Vent
4) RCS Loop B High Point Vent

In order for a vent path to perform its intended safety function of venting, the two electrically-operated valves must be capable of being opened, and all manual valves must be open.

b. If one RCS vent path is inoperable, the vent path shall be restored to operable status within 30 days, or the unit shall be in hot shutdown within the next 12 hours and below 250° F in an additional 24 hours.

c. If more than one RCS vent path is inoperable, the RCS vents shall be restored to a status such that not more than one vent path is inoperable within 72 hours, or the unit shall be in hot shutdown within the next 12 hours and below 250° F in an additional 24 hours.

Bases

Reactor Coolant System Vents are provided to exhaust noncondensible gases and/or steam from the primary system that could inhibit natural circulation core cooling. The capability of natural circulation core cooling is required above 250° F. Below 250° F, the low pressure injection system can be utilized to remove decay heat.

Guidance for these requirements was provided by Item II.B.1 of NUREG-0737, "Classification of TMI Action Plan Requirements", October 1980, and by Generic Letter No. 83-37, "NUREG-0737 Technical Specifications", November 1983.

DUKE POWER COMPANY

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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 10CFR50.92. 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.

The proposed change constitutes an additional restriction not presently included in the Technical Specifications by defining the operability requirements and limiting conditions for operation of the reactor coolant system vents, thereby assuring the capability to exhaust noncondensible gases and/or steam from the primary system that could inhibit natural circulation. With an operable flow path available the consequences of previously evaluated accidents that may result in the formation of void within the RCS is reduced, in that the void can be vented when required. The probability that such accidents will occur is not affected by this change since the change is not considered to be an initiator. In addition the valve redundancy of the RCS vent paths serves to minimize the probability of inadvertent or irreversible actuation of the vent path. Consequently, this change will not increase the probability or consequences of an accident.

(2) Create the possibility of a new or different kind of accident from any kind of accident previously evaluated.

It has been determined that a new or different kind of accident will not be possible due to this change. This change constitutes an additional restriction, defining the operability of the RCS vent paths. The valve redundancy ensures that a single failure of a vent valve, power supply or control system does not prevent isolation of the vent path. In addition this serves to minimize the risk associated with the inadvertent or irreversible actuation of the vent path. As such, this change does not create the possibility of a new or different kind of accident.

(3) Involve a significant reduction in a margin of safety

This change constitutes an additional restriction in that the operability requirements for the RCS vent paths are defined. These vent paths are provided to exhaust noncondensible gases and/or steam from the primary system. As such, the margin of safety offered by the RCS vent paths in mitigating, the consequences of certain accidents is enhanced. Therefore, there will not be a reduction in a margin of safety.

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve a significant hazards consideration. Example (ii) relates to a change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications.

In this case, the change proposed in this request is similar to Example (ii) in that Technical Specification 3.1.13 provides limiting conditions for reactor coolant system vent operability; an action statement in the event the LCO is not satisfied; as well as providing a safety bases per Generic Letter 83-37.

Duke has concluded, based on the above, and Technical Justification provided by Generic Letter 83-37 Item II.B.1, that there is a No Significant Hazards Consideration involved in this amendment request.