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SUBJECT: Forwards addl info re 870814 request for amend to Licenses DPR-38, DPR-47 & DPR-55, revising Tech Spec 3.4.4.

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January 23, 1990

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287

Dear Sir:

By a letter dated August 14, 1987, I had submitted pursuant to 10 CFR 50, 50.9, a proposed amendment to the Oconee Facility Operating License and a revision to the Oconee Nuclear Station technical specifications. The proposed amendment would revise Technical Specification 3.4.4 to raise the minimum upper surge tank level from 5 feet to 6 feet. In support of this amendment request, the attachment provides additional information.

If you have any questions regarding this matter, please feel free to contact us through normal licensing channels.

Very truly yours,

H. B. Tucker

PFG89/td

Attachment

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Attachment

Oconee Nuclear Station
Additional Information

Currently Technical Specification 3.4.4 specifies that a minimum level of 5 feet shall be available in the upper surge tank (UST) for emergency feedwater (EFW) pump suction. This level is based on the tank volume that corresponds to 30,000 gallons. As a result of an analysis, the level requirement should be increased to 6 feet to assure that approximately 30,000 gallons is available. This level requirements assures that the plant operators have at least 20 minutes to act before the UST is emptied, assuming that the highest capacity EFW pump is running.

The proposed minimum UST level of six feet incorporates a 9-inch allowance for level indication uncertainty. The UST level indication is provided by redundant safety-grade instrumentation strings (per Reg. Guide 1.97) utilizing Rosemount differential pressure transmitters. The measured differential pressures provide inputs to the following equipment:

- a) the plant computer
- b) control room gauges
- c) control room strip recorders
- d) control room level alarm annunciators.

The allowance of 9 inches bounds the uncertainty associated with each of these indications.

For each UST level indication, the uncertainty has been calculated by combining the various uncertainty components associated with the indication equipment. The uncertainty components include:

- a) hardware-induced uncertainties such as temperature effects, static pressure effects, power supply effects, etc.;
- b) calibration and drift uncertainties;
- c) uncertainties introduced by variations in UST water density.

The individual uncertainty components are combined using square root of the sum of the squares methodology. The level uncertainty allowance of 9 inches was developed based on non-safety grade UST level instrumentation that has been replaced by the more accurate, safety-grade instrumentation. Therefore, the 9 inch allowance conservatively bounds the overall indication uncertainty associated with each of the various UST level indications.

An UST low level alarm is provided to alert the operator to the need to replenish the UST or to align the EFW pump suction to the condenser hotwell. The low level alarm setpoint has been developed in conjunction with the 6-foot minimum UST level setpoint, to assure that

- a) at least 20 minutes is available for operator action time before realignment of the EFW pump suction is necessary, and
- b) sufficient time is available to realign the EFW pump(s) before draining down the UST.

The level setpoints actually provide about an hour of available operator action time and assure that the EFW pump NPSH requirements are met.