## DUKE POWER COMPANY OCONEE NUCLEAR STATION ATTACHMENT

### Revised No Significant Hazards Consideration Evaluation

Replace Attachment 5 to the May 3, 1993 amendment request

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### 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 NRC regulations in 10CFR50.92. This ensures that operation of the facility in accordance with the proposed amendment would not:

# (1) <u>Involve a significant increase in the probability or consequences of an</u> accident previously evaluated:

Each accident analysis addressed within the Oconee Final Safety Analysis Report (FSAR) has been examined with respect to the changes proposed within this amendment request. Changes included in this amendment request are provided to assure availability of electrical power systems for mitigation of Design Basis Accidents (DBAs). As described within the technical justification, the following types of changes are included:

1) Editorial and administrative changes associated with reformatting the Technical Specification requirements;

2) Additional restrictions not presently included in the Technical Specifications such as the addition of requirements for electrical power systems during cold shutdown and refueling, for the 230kV switchyard degraded grid protection system and to delete the special inoperability period for the Keowee CX transformer;

3) Technical changes to current requirements to provide clarity and operational flexibility. These changes maintain the ability of the electrical power systems to mitigate the consequences of DBAs without a significant reduction in availability. These changes include the definition of emergency power paths to include the associated DC sources and auxiliary transformers, the combination of special inoperability periods for "planned" and "unplanned" reasons, and the ability to use the Keowee special inoperability period more than once in a three year period; and

4) Relocation of requirements which are unnecessary for the mitigation of DBAs to licensee controlled documents. Relocated requirements include surveillance requirements for the External Grid Trouble Protection system.

Based on the above and the technical justification provided in Attachment 4, there is no significant increase in the probability of DBA as a result of this change, nor is there a significant increase in the consequences of a DBA as a result of this change since the proposed amendment assures availability of electrical power systems.

### (2) <u>Create the possibility of a new or different kind of accident from any</u> kind of accident previously evaluated:

The proposed changes make no physical changes to the plant configuration and do not adversely affect the performance of any equipment. Operation

August 26, 1993



### Attachment 5 No Significant Hazards Consideration Evaluation

of ONS in accordance with these Technical Specifications will not create any failure modes not bounded by previously evaluated accidents. Consequently, this change will not create the possibility of a new or different kind of accident from any kind of accident previously evaluated.

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

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Margins of safety associated with these Technical Specifications have been evaluated. These changes include editorial and administrative changes associated with reformatting the Technical Specification requirements, additional restrictions not presently included in the Technical Specifications, technical changes to current requirements which maintain the ability of the electrical power systems to mitigate the consequences of DBAs, and relocation of requirements which are unnecessary for the mitigation of DBAs to licensee controlled documents. The design basis of auxiliary electrical systems is to supply the required ES loads of one Unit and safe shutdown loads of the other two units. The proposed amendment does not affect any safety limits, setpoints, or design parameters and assures the continued availability of electrical power systems; thus preserving the existing margin of safety. Therefore, there will be no significant reduction in any margin of safety.

Duke has concluded based on the above, and the technical justification in Attachment 4 that there are no significant hazards considerations involved in this amendment request.