ATTACHMENT I

Please revise your copy of the Technical Specifications as follows:

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3.7-13	3.7-13
3.7-15	3.7-15

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which allows a reasonable period of time to remove the existing transformer and install a replacement.

In the event that none of the sources of off-site power are available and it is considered important to continue to maintain an Oconee reactor critical or return it to criticality from a hot shutdown condition, one of the Lee gas turbines can be made available as an additional backup source of power, thus assuring continued availability as an auxiliary power to perform an orderly shutdown of a unit should a problem develop requiring shutdown of both hydro units.

The power system of the Keowee Hydro station is designed to allow the alignment of each of the two units to the Oconee emergency power systems through either the underground feeder or the overhead path via the main step-up transformer. During an emergency start one of the Keowee units will be aligned to the underground feeder and the other to the overhead path. Each Keowee unit's 600 VAC auxiliaries are powered from the unit's generator through a 750KVA auxiliary transformer. Each auxiliary transformer is capable of handling auxiliary loads of both units. Unit's auxiliaries can be aligned to receive power from either transformer by a manual transfer capability at the load center level. A backup 750KVA auxiliary transformer (CX) is provided and powered from Oconee 4KV switchgear ITC through an underground feeder.

In the event that the EPSL is in a degraded mode while the reactor is subcritical, a return to criticality may not be made unless the return to criticality is permitted by a controlling Technical Specification for an emergency power system component(s). However, all functional units of the EPSL not affected by the inoperability of the emergency power system component(s) must be operable prior to return to criticality. This ensures the availability of the EPSL during all reactor startups.

The normal source breakers (N_1 and N_2) provide power to the main feeder buses from the auxiliary transformer under normal power operation of the plant. Under accident conditions the normal breakers open to allow an emergency power flowpath to the main feeder buses. Since there is no emergency closing function, the N_1 and N_2 breakers may be opened and control circuitry deenergized without degrading the capability of the EPSL to perform its intended safety function. Therefore, while the N_1 and N_2 breakers are open, Technical Specification 3.7.2 (b) is considered to be satisfied with respect to N_1 and N_2 functional units of the EPSL.

120 VAC Vital Instrumentation Power Panelboards

For each unit, four redundant 120 VAC vital instrument power panelboards are provided to supply power in a predetermined arrangement to vital power, instrumentation, and control loads under all operating conditions. Each panelboard is supplied power separately from a static inverter connected to one of the four 125 VDC instrumentation and control power panelboards. In addition, a tie with breakers is provided to each of the 120 VAC vital panelboards from the alternate 120 VAC regulated bus to provide backup for each vital panelboard and to permit servicing of the inverters.

For each unit, each of the four redundant channels of the nuclear instrumentation and reactor protective system (RPS) equipment is supplied power from a separate 120 VAC vital panelboard. Also for each unit, each of the three redundant engineered safety features actuation system (ESFAS) analog channels and each of the two redundant ESFAS digital channels are powered from separate vital panelboards.

The period allowed for corrective action on an inoperable vital panelboard depends on the loads carried by the affected panelboard. For example, panelboards KVIA and KVIB are allowed to be inoperable for only four hours because they provide power to the digital ESFAS channels, which are in turn allowed to be inoperable for only four hours by Technical Specification 3.5.1. In contrast, panelboards KVIC and KVID carry loads which do not necessarily become inoperable upon loss of power (e.g., RPS channels and ESFAS analog channels go to a tripped state upon loss of power) and thus do not necessitate immediate corrective action. Thus, these panelboards have been limited to a period of inoperability which does not exceed that allowed for their normal source of power, the 125 VDC instrumentation and control panelboards.

In the event that failure of a static inverter results in the inoperability of its associated vital panelboard, the affected panelboard may be tied to the 240/ 120 VAC regulated power system and unit operation may continue for seven days. This specification allows sufficient time for the inverter to be repaired without penalizing unit operation by permitting the use of alternate power sources.

Reporting Requirements

Specification 3.7.9 includes reporting requirements in the event there is degradation beyond Specifications 3.7.2, 3.7.4, 3.7.5, 3.7.6, 3.7.7, or 3.7.8. The 24 hour report to Region II is accomplished by 10 CFR 50.72 notification of the NRC operations center. The 5 day written report has been established to provide the NRC the results of safety evaluations in the event the degraded condition will be ongoing.