October 19, 1999

To: Manual Holders

Subject: Oconee Selected Licensee Commitments Manual (SLC) Revision

On September 30, 1999, Station Management approved a revision to SLC 16.7.5 to be implemented on 10/4/99. The subject change modifies SLC 16.7.5 by adding a Note that permits the applicable portions of the Steam Generator Overfill Protection system to be inoperable in the event the associated MFW pump is incapable of supplying water to the steam generators. In this case, the affected MFW pump cannot overfill the steam generator.

Likewise on October 8, 1999, Station Management approved a revision to SLC 16.13.7 to be implemented on 10/11/99. SLC 16.13.7, Commitment b. has been revised to require that procedures include provisions to establish LPI prior to switchover to sump recirculation following a CFT line break. Previously, this commitment had required that this alignment, for both HPI and LPI, be completed within 15 minutes of a line break. The requirement for HPI has been deleted totally, as HPI is required within 10 minutes by other procedures.

Please revise your SLC manual according to the instructions below.

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Any questions concerning this revision may be directed to Boyd Shingleton at 864-885-3428.

Regulatory Compliance By: Conice Breazeale Regulatory Compliance

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16.7 INSTRUMENTATION

16.7.5 Steam Generator Overfill Protection

COMMITMENT The steam generator overfill protection system shall be OPERABLE.

When a Main Feedwater pump is incapable of feeding the steam generators, the associated portions of the steam generator overfill protection system are not required to be OPERABLE.

APPLICABILITY: MODES 1 and 2, MODE 3 when RCS $T_{ave} > 325^{\circ}F$

ACTIONS

	CONDITION	REQUIRED ACTION		COMPLETION TIME
Α.	Steam generator overfill protection system inoperable.	A.1	Restore to OPERABLE status.	72 hours
В.	Required Action and associated Completion Time not met.	When ir Action r B.1	NOTE nitiated the Required must be completed. Submit a written report to the NRC outlining the cause of the channel(s) or system(s) malfunction and the plans for restoring the channel(s) or system(s) to OPERABLE status.	30 days

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COMMITMENT

Steam generator overfill protection is provided through the ICS to terminate main feedwater when the high level setpoint is reached. Two transmitters per steam generator monitor steam generator water level. Protection is provided by 2 out of 2 logic on either steam generator which actuates two trip devices. The high level monitoring circuits deenergize to trip: thus a deenergized module is operable. Two trip devices (SV6 and SV12) are provided on each MFWPT. For example, 2 out of 2 logic on the "A" steam generator will actuate both trip devices-on both MFWPTs. Since either steam generator can cause an overcooling event, then the overfill protection logic for both steam generators are required to be operable for the overfill protection system to be considered operable.

This Commitment is modified by a Note that states portions of the steam generator overfill protection system may be inoperable when the associated MFWP is incapable of feeding the steam generators (e.g., when the pump is uncoupled, or the steam supply to its turbine is isolated).

ACTIONS

The 72 hour completion time in Required Action A.1 provides an adequate level of availability of the overfill protection system for performing its function while allowing reasonable time to permit necessary maintenance on the system.

SURVEILLANCE REQUIREMENTS

SR 16.7.5.1

This surveillance verifies that the SV6 trip device will trip the associated MFWPT. SV6 is exercised by the "oil trip" test. When the oil trip is exercised, SV6 is energized thus tripping the overspeed governor which trips the mechanical trip mechanism of the MFWPT. This surveillance can be performed on line and is part of the secondary system protection test. The 92 day frequency for this Surveillance was determined to be adequate based on operating experience.

SR 16.7.5.2

This surveillance verifies that the SV12 trip device will trip the associated MFWPT. This Surveillance can only be performed when the MFWPT is out of service. The 18 month frequency for this Surveillance was determined to be adequate based on operating experience.

<u>SR 16.7.5.3</u>

This surveillance requires a CHANNEL FUNCTIONAL TEST which verifies a trip signal is provided in response to high steam generator level. The 18 month frequency for this Surveillance was determined to be adequate based on operating experience.

16.7.5-3

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<u>SR 16.7.5.4</u>

This surveillance requires a CHANNEL CALIBRATION which verifies the channel responds to steam generator level with the necessary range and accuracy. This surveillance is also required by ITS SR 3.3.8-1 for Item 12. The 18 month frequency for this surveillance was determined to be adequate based on operating experience.

REFERENCES:

- 1. Generic Letter 89-19, Request for Action Related to Resolution of Unresolved Safety Issue A-47 "Safety Implication of Control Systems in LWR Nuclear Power Plants."
- 2. H. B. Tucker (Duke) to NRC Document Control Desk, Response to GL 89-19, March 19, 1990

16.13 CONDUCT OF OPERATIONS

- 16.13.7 Procedures for Control of pH in Recirculated Coolant After Loss-of-Coolant Accident (LOCA) & Long-Term Emergency Core Cooling Systems
- COMMITMENT a. Procedures shall state that pH will be measured and the addition of appropriate caustic to coolant will commence within 30 minutes after switchover to recirculation mode of core cooling to adjust the pH to a range of 7.0 to 8.0 within 24 hours.
 - b. Procedures shall include provision for remote or local operation of system components necessary to establish low pressure injection prior to switchover to sump recirculation following a Core Flood Tank line break.

APPLICABILITY: At all times.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. N/A	A.1 N/A	N/A

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 16.13.7.1	N/A	N/A

<u>BASES</u>

The requirement(s) of this SLC section were relocated from CTS 6.4.1.i and 6.4.1.k during the conversion to ITS.

REFERENCES

N/A

16.13.7-1

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