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December 6, 1999


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

Subject: Oconee Nuclear Station  
Docket 50-269, -270, -287  
Selected Licensee Commitments Manual (SLC)

Gentlemen:

Pursuant to 10CFR 50.4 and 50.71, please find attached 7 copies of the latest revisions to the Oconee Selected Licensee Commitments Manual (SLC). The SLC Manual is Chapter 16.0 of the Oconee Updated Final Safety Analysis Report (UFSAR). This manual is intended to contain commitments and other station issues that warrant higher control, but are not appropriate for inclusion into the Technical Specifications (TS). Instead of being updated with the annual UFSAR Update, the SLC Manual will be updated as necessary throughout the year.

Very truly yours,

  
W. R. McCollum, Jr.  
Vice President  
Oconee Nuclear Station

CMB/cmb  
Attachment

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A053

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U. S. Nuclear Regulatory Commission  
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December 6, 1999

To: Manual Holders

Subject: Oconee Selected Licensee Commitments Manual (SLC)  
Revision

On November 29, 1999, Station Management approved changes to SLC 16.13.1 and 16.13.5 Minimum Staffing to be implemented on 11/30/99. The ongoing EOP project conducted an extensive integrated evaluation of the staffing needs to respond to events at Oconee and identified a concern regarding the ability to respond to a design basis Appendix R fire, which includes a loss of offsite power and the associated task of deploying the SSF submersible pump. The SLC change consolidates station staffing requirements into one document.

Likewise, on November 4, 1999, Station Management approved changes to SLC 16.9.1, 16.9.2, 16.9.3, 16.9.4, 16.9.5, 16.9.6 and 16.13.1. Reference to the Fire Protection Review (FPR) contained in the Reference Section for each of the subject SLCs is modified to indicate that the FPR is currently contained in the Fire Protection DBD. This is being done for consistency and to avoid confusion between how the UFSAR and SLC references the Fire Protection Review.

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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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BASES

Portions of Surveillance SR 16.9.1.2 involving the HPSW pumps and power supplies were relocated from CTS Table 4.1-2, Item 8 during the conversion to the ITS.

The **OPERABILITY** of the Fire Suppression System ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where safety-related equipment is located. The Fire Suppression System consists of the Water Supply System, spray and/or sprinklers, Keowee CO<sub>2</sub> and fire hose stations. The collective capability of the Fire Suppression Systems is adequate to minimize potential damage to safety-related equipment and is a major element in the facility fire protection program. In the event that portions of the Fire Suppression Systems are inoperable, alternate backup fire-fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service.

The Testing Requirements provide assurance that the minimum **OPERABILITY** requirements of the Fire Suppression Systems are met. In the event the Fire Suppression Water Supply System becomes inoperable, immediate corrective measures must be taken since this system provides the major fire suppression capability of the plant. This Selected Licensee Commitment is part of the Oconee Fire Protection Program and therefore subject to the Provisions of Oconee Facility Operating License conditions.

REFERENCES:

- 1) Oconee UFSAR, Chapter 9.5.1.
- 2) Oconee Fire Protection SER dated August 11, 1978.
- 3) Oconee Fire Protection Review, (currently contained in the Fire Protection DBD), as revised.
- 4) Oconee Plant Design Basis Specification for Fire Protection as revised.

## BASES

The OPERABILITY of the NRC committed Fire Suppression System ensures that adequate fire suppression capability is available to confine and extinguish fires occurring at the Oconee or Keowee facilities. The regulatory requirement is to have NRC committed Sprinkler and Spray Systems OPERABLE only when the equipment it is protecting is required OPERABLE for plant safety. However, to protect the equipment for property conservation and minimize equipment loss due to fire; the Oconee and Keowee NRC committed Sprinkler and Spray Systems will be required to be OPERABLE at all times.

The Oconee CT-1, 2, 3, and 5 transformers do not have fire detection devices. They have fire actuation devices that actuate the deluge valve of the fire suppression systems. These actuation devices do not directly annunciate to the Control Rooms. When the deluge valve trips, the flow pressure switch is the sensor that activates the Control Room alarms. With HPSW deactivated for maintenance or testing, there is no form of annunciation of a fire in the Control Room.

During periods of time when the Sprinkler or Spray system is not operable and detection instrumentation is operable, a hourly fire watch patrol will be required to inspect the affected area frequently as a precaution. If the sprinkler or spray system in the area is not operable and no detection instrumentation is operable, a continuous fire watch is required to be maintained in the vicinity of the affected sprinkler or spray system until the system is restored to operable status.

In the event that portions of the Fire Suppression Systems are inoperable, alternate backup fire-fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service.

The test requirements provide assurance that the minimum OPERABILITY requirements of the Fire Suppression Systems are met.

This Selected Licensee Commitment is part of the Oconee Fire Protection Program and therefore subject to the provisions of Oconee Facility Operating License conditions.

## REFERENCES

1. Oconee UFSAR, Chapter 9.5-1.
2. Oconee Fire Protection SER dated August 11, 1978.
3. Oconee Fire Protection Review, (currently contained in the Fire Protection DBD), as revised. |
4. Oconee Plant Design Basis Specification for Fire Protection, as revised.

SURVEILLANCE	FREQUENCY
SR 16.9.3.4      Perform flow test through headers and nozzles to assure no blockage.	18 months

**BASES**

The OPERABILITY of the NRC committed Keowee CO<sub>2</sub> Fire Suppression system ensures that adequate fire suppression capability is available to protect safety-related equipment by confining and extinguishing fires occurring in the Keowee electric generators. The regulatory requirement is to have the Keowee CO<sub>2</sub> Fire Suppression System OPERABLE only when the equipment it is protecting is required OPERABLE for plant safety, however to also protect the equipment for property conservation and minimize equipment loss due to a fire; the Keowee CO<sub>2</sub> Fire Suppression System will be required OPERABLE at all times.

The Fire Suppression System consists of the water system, spray and/or sprinklers, Keowee CO<sub>2</sub> system and fire hose stations. The collective capability of the Fire Suppression Systems is adequate to minimize potential damage to safety-related equipment and is a major element in the facility fire protection program.

In the event that portions of the Fire Suppression Systems are inoperable, alternate backup fire-fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service. The Testing Requirements provide assurance that the minimum OPERABILITY requirements of the Fire Suppression Systems are met.

This Selected Licensee Commitment is part of the Oconee Fire Protection Program and therefore subject to the provisions of Oconee Facility Operating License Conditions.

**REFERENCES:**

1. Oconee UFSAR, Chapter 9.5-1.
2. Oconee Fire Protection SER dated August 11, 1978.
3. Oconee Fire Protection Review, (currently contained in the Fire Protection DBD), as revised. |
4. Oconee Plant Design Basis Specification for Fire Protection, as revised.

BASES

The OPERABILITY of the NRC committed Fire Suppression System ensures that adequate fire suppression capability is available to confine and extinguish fires occurring at the Oconee or Keowee facilities. The regulatory requirement is to have NRC committed Fire Hose Stations OPERABLE only when the equipment it is protecting is required OPERABLE for plant safety. However, to protect the equipment for property conservation and minimize equipment loss due to fire; the Oconee and Keowee NRC committed Fire Hose Stations will be required to be OPERABLE at all times.

In the event that portions of the Fire Suppression Systems are inoperable, alternate backup fire-fighting equipment is required to be made available for the affected areas until the inoperable equipment is restored to service.

The testing requirements provide assurance that the minimum OPERABILITY requirements of the Fire Suppression System are met.

This Selected Licensee Commitment is part of the Oconee Fire Protection Program and therefore subject to the provisions of Oconee Facility Operating License Conditions.

REFERENCES:

1. Oconee UFSAR, Chapter 9.5-1.
2. Oconee Fire Protection SER dated August 11, 1978.
3. Oconee Fire Protection Review, (currently contained in the Fire Protection DBD), as revised.
4. Oconee Plant Design Basis Specification for Fire Protection, as required.

## BASES

The functional integrity of the penetration fire barriers ensures that fires will be confined or adequately retarded from spreading to adjacent portions of the facility. This design feature minimizes the possibility of a single fire rapidly involving several areas of the facility prior to detection and extinguishment. The penetration fire barriers are a passive element in the facility fire protection program and are subject to periodic inspections and sampling.

The OPERABILITY of a NRC committed fire barrier ensures that fires will be confined or adequately retarded from spreading to adjacent portions of the facility. The regulatory requirement is to have NRC committed Fire Barriers OPERABLE only when the equipment it is protecting is required OPERABLE for plant safety. However, to also protect the equipment for property conservation and minimize equipment loss due to fire; the Oconee and Keowee NRC committed Fire Barriers will be required to be OPERABLE at all times.

During periods of time when a barrier is not functional, a fire watch patrol will be required to inspect the affected area frequently as a precaution in addition to the fire detection instrumentation in the area. If fire detection instrumentation in the area is not operable, a continuous fire watch is required to be maintained in the vicinity of the affected barrier until the barrier is restored to functional status. Fire detection is not specifically designed at ONS to provide early detection of fire near the committed fire boundaries as denoted on the drawing series O-310K and O-310L. Fire detection instrumentation design locations were typically based on protecting specific equipment and areas important to safety or where major fire hazards were located and not to provide full detection coverage for all areas of the plant. In actuality fire detection instrumentation's ability to quickly respond to the incipient stages of a fire are based on distance from the hazard, type of hazard, obstruction, and air flows in the area. The application of the specific fire detection instrumentation used at ONS provide a adequate response time for a floor distance of approximately 15 feet in radius from the detector location.

This Selected Licensee Commitment is part of the Oconee Fire Protection Program and therefore subject to the provisions of Oconee Facility Operating License Conditions.

## REFERENCES:

1. Oconee UFSAR, Chapter 9.5-1.
2. Oconee Fire Protection SER dated August 11, 1978.
3. Oconee Fire Protection Review, (currently contained in the Fire Protection DBD), as revised.
4. Oconee Plant Design Basis Specification for Fire Protection, as revised.

BASES

**OPERABILITY** of the NRC committed Fire Detection Instrumentation ensures that adequate warning capability is available for the prompt detection of fires in areas containing safety related and important to safety equipment at Oconee and Keowee Facilities. Prompt detection of fires will reduce the potential for damage to safety related equipment and is an integral element in the overall facility fire protection program. The regulatory requirement is to have NRC committed Fire Detection Instrumentation **OPERABLE** only when the equipment it is protecting is required **OPERABLE** for plant safety. However, to also protect the equipment for property conservation and minimize equipment loss due to fire; the Oconee and Keowee NRC committed Fire Detection Instrumentation will be required to be **OPERABLE** at all times.

In the event that a portion of the Fire Detection Instrumentation is inoperable, the establishment of compensatory actions in the affected areas is required to provide detection capability until the inoperable instrumentation is restored to operability.

This Selected Licensee Commitment is part of the Oconee Fire Protection Program and therefore subject to the provisions of Oconee Facility Operating License Conditions.

REFERENCES:

1. Oconee UFSAR, Chapter 9.5-1.
2. Oconee Fire Protection SER dated August 11, 1978.
3. Oconee Fire Protection Review, (currently contained in the Fire Protection DBD), as revised.
4. Oconee Plant Design Basis Specification for Fire Protection, as revised.
5. Oconee Plant Design Basis Specification for Fire Detection, as revised.



16.13 CONDUCT OF OPERATIONS

16.13.1 Minimum Station Staffing Requirements

COMMITMENT a. Minimum station staffing shall be as indicated in Table 16.13.1-1 and shall meet the following additional requirements:

1. At least one RO per unit shall be present in the control room when fuel is in the reactor. In addition, while the unit is in MODES 1, 2, 3, or 4, at least one licensed SRO shall be present in the control room.
2. At least one licensed operator shall be in the reactor building when fuel handling operations in the reactor building are in progress. In addition, during CORE ALTERATIONS including fuel loading and transfer, an SRO or an SRO limited to fuel handling shall be present to directly supervise the activity and, during this time, shall not be assigned to other licensed activities
3. If the computer for a reactor is inoperable for more than eight hours, an operator, in addition to those specified in ITS 5.2.2.b and 10 CFR 50.54(m) shall supplement the control room staff.

b. The Shift Technical Advisor shall be an experienced SRO.

APPLICABILITY: At all times.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Requirements for minimum station staffing not met.	A.1 Restore minimum station staffing levels.	2 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 16.13.1.1 N/A	N/A

Table 16.13.1-1

**MINIMUM STATION STAFFING REQUIREMENTS**

	THREE UNITS IN MODES 1-4	TWO UNITS IN MODES 1-4 CONTROLLED FROM TWO CONTROL ROOMS	TWO UNITS IN MODES 1-4 CONTROLLED FROM ONE CONTROL ROOM	ONE UNIT IN MODES 1 - 4	THREE UNITS IN MODES 5 OR 6 OR NO MODE
OSM	1	1	1	1	1
STA	1	1	1	1	1
SRO <sup>1</sup>	5	5	4	4	3
RO	6	5	5	4	3
NLO <sup>1</sup>	8	8	8	8	7
SPOC	7	7	7	7	6
Chemistry Technician	1	1	1	1	1
RP Technician	3	3	3	3	3

<sup>1</sup> SRO number can be reduced by one when a qualified NLO is designated the fire brigade leader. The NLO number must be increased by one.

**BASES**

Some of the requirement(s) of this SLC section were relocated from TS 6.1.1.9 and TS Table 6.1-1 during the conversion to ITS. These requirements were initially relocated to SLC 16.13.5, "Additional Operating Shift Requirements," dated 3/27/97.

The requirements of this SLC consolidate ONS station staffing requirements into one document. This SLC includes the shift manning requirements of ITS 5.2.2, 10 CFR 50 Appendix R Section III.H, 10 CFR 50.54.m, Operations Management Procedures (OMPs), NSD 112, and the Emergency Plan. This SLC also includes the old requirements of SLC 16.13.1, "Fire Brigade," dated 3/27/99 and SLC 16.13.5; "Additional Operating Shift Requirements dated 3/27/99. The numbers for each position per shift are additive. For example, Table 16.13.1-1 requires a total of 5 SROs per shift (3 SROs required by 10 CFR 50.54(m)(2)(i) plus 1 additional SRO for the Fire Brigade and 1 additional for the ERO). The bases for the numbers in the first column of SLC Table 16.13.1-1 are as follows:

- |   |   |
|---|---|
| 1 OSM (active SRO)                                  | Required by 50.54(m)(2)(ii) (implemented by OMP).   |
| 1 STA (active or inactive SRO)                      | Required by ITS 5.2.2.g which indicates the individual fulfilling the STA position is the Shift Work Manager (implemented by OMP). Revision 50 to OMP 2-1 renamed the person fulfilling this position an STA. Note that pre-conversion TS Table 6.1-1, which implemented NUREG-0737 requirements, did not require an STA on shift when no units were in MODES 1-4. The SLC Table is more restrictive in that it requires an STA on shift at all times.  |
| 3 SRO's (active SRO)                                | Required by 10 CFR 50.54(m)(2)(i). Per ITS 5.2.2.b and 10 CFR 50.54(m)(2)(iii) at least 2 SRO's must be in the control room.  |
| 1 SRO (active or inactive) or NLO<br>- Fire Brigade | Required by Appendix R Section III.H. Implemented by OMP and NSD. Individual fulfilling position shall be a SRO or an NLO who is qualified to be a fire brigade leader. Per OMP this individual functions as fire brigade leader and is not available for control room activities when directing the fire brigade. Appendix R does not specify that the brigade leader be an SRO, it only specifies that the fire brigade leader have sufficient training in or knowledge of plant safety-related systems to understand the effects of fire and fire suppression systems on safe shutdown capability. When an |

NLO is serving as the fire brigade leader, the SRO number for each column in Table 16.13.1-1 may be reduced by one.

1 SRO (active or inactive) – ERO

Required by Volume A, Section B, Figure B-2 of the Emergency Plan. Implemented by OMP. SRO serves as the offsite communicator and the NRC communicator in the TSC. This is permissible since the offsite communicator role is completed prior to the NRC communicator role starting.

5 RO's

Required by 10 CFR 50.54(m)(2)(i).

1 RO - SSF

Required by ITS 5.2.2.h, implemented by OMP. Per ITS 5.2.2.h, the manpower necessary to operate the SSF will be exclusive of the fire brigade and the minimum operating shift that is required to be present in the Control Room. ITS 5.2.2.b and 10 CFR 50.54(m)(2)(iii) require 3 of the 5 RO's required by 10 CFR 50.54(m)(2)(i) to be present in the control room when fuel is in the reactor. When all three units are in MODES 1-3, one RO per unit must be available to be dispatched to the SSF. Since 3 RO's must be present in the Control Room only two are available to dispatch to the SSF. Therefore, one additional RO, beyond what is required by 10 CFR 50.54(m)(2)(i), is required.

8 NLO's

Required by 10 CFR 50 Appendix R Part III.H, ITS 5.2.2.a, Volume A, Appendix 8, Spill Prevention and Control and Counter Measures Plan, Revision 98-04, 10/98 of the Emergency Plan, and Volume A, Section B, Figure B-8 of the Emergency Plan. Implemented by OMP. (Four for fire brigade, one NLO per Unit to complete critical AP and EOP actions and 1 for SSF equipment verification for the design basis Appendix R fire.) When an NLO is serving as the fire brigade leader, the NLO number for each column in Table 16.13.1-1 must be increased by one.

The number of NLOs that are fire brigade qualified may be reduced provided that a like number of fire brigade qualified personnel are provided from other organizations. This does not change the total

7 SPOC

number of NLOs required; only the number required to be fire brigade qualified.

Required by Volume A, Section B, Figure B-8 of the Emergency Plan and the Fire Plan (Volume A, Appendix 8, Spill Prevention and Control and Counter Measures Plan, Revision 98-04, 10/98). Implemented by OMP 1-7 and NSD 112. Consists of two I&E technicians ERO qualified and knowledgeable of IP/O/A0050/003 (Power SSF Submersible Pump), two MM technicians ERO qualified and knowledgeable of MP/O/A/1300/059 (Install SSF Submersible Pump), one supervisor or temporary supervisor qualified to establish the OSC and perform the OSC Maintenance Supervisor functions, and one additional person to help with pump installation as directed by SPOC supplied by one of the following groups in the order listed: SPOC, other maintenance personnel onsite, C&F, Chemistry, RP and Maintenance Overtime resources. Security will automatically supply one Security Guard to open doors and gates who will also assist with any maintenance activities to be performed. The Security Guard is counted as one of a total of 6 people needed to install the submersible pump. One other person is needed to establish the OSC for a total of 7. In the event of a fire, SPOC will respond to the fire until directed to install the submersible pump. A total of 5 SPOC personnel are assigned to the fire brigade. Per PIP 4-O99-2987 problem evaluation, it is acceptable to consider these additional 5 Fire Brigade members to be available for other duties, such as installation of the SSF pump. This is based on Oconee Fire Brigade Guide #2, which contains guidance that allows fire brigade members to be released from the brigade for operational needs at the discretion of the OSC/TSC.

The number of SPOC personnel qualified as fire brigade members may be reduced, provided that the qualified fire brigade members from other organizations are increased by a like number. This does not change the total number of SPOC personnel required, only the number required to be fire brigade qualified.

**1 Chemistry Technician - ERO**

Required by Volume A, Section B, Figure B-8 of the Emergency Plan. Implemented by OMP and Station Chemistry Manual 2.6. A Chemistry Technician who is fire brigade qualified may be credited toward fulfilling the ERO requirement and the fire brigade requirement. In the event of a fire, the Chemistry technician will respond to the fire until directed otherwise.

**3 RP Technicians**

Three are required by Volume A, Section B, Figure B-8 of the Emergency Plan. One is required by ITS 5.2.2.d and may be counted towards fulfilling the ERO requirement. Implemented by HP/0/B/1000/054. RP technicians who are fire brigade qualified may be credited toward fulfilling the ERO and TS requirements and the fire brigade requirement. In the event of a fire, the RP technician will respond to the fire until directed otherwise.

Minimum Station Staffing numbers for the SRO and RO positions in Table 16.13.1-1 change as a function of the number of units in MODES 1-4 and whether the operating Units are controlled from one or two Control Rooms. The number for the remaining positions in Table 16.13.1-1 is not affected by operational condition of the units.

- 10 CFR 50.54(m)(2)(i) requires 3 SROs when two units are in MODES 1-4 and controlled from two Control Rooms, 2 SROs when two units are in MODES 1-4 and controlled from a common control room, 2 SROs when one unit is MODES 1-4 and 1 SRO when no units are MODES 1-4. Thus considering fire brigade and ERO requirements, this results in the requirement for 5 SROs when two units are in MODES 1-4 and controlled from two Control Rooms, 4 SROs when two units are in MODES 1-4 and controlled from a common control room, 4 SROs when one unit is MODES 1-4 and 3 SROs when no units are MODES 1-4.
- 10 CFR 50.54(m)(2)(i) requires 5 ROs when two units are in MODES 1-4 and controlled from two Control Rooms, 4 ROs when two units are in MODES 1-4 and controlled from a common control room, 4 ROs when one unit is MODES 1-4 and 3 ROs when no units are MODES 1-4. OMPs require 2 ROs to man the SSF when two units are in MODES 1-3 and 1 RO when one unit is MODES 1-3. None are required when no units are in MODES 1-3. Therefore, no additional RO's are required beyond what is required by 10 CFR 50.54(m)(2)(i) when less than three units are in MODES 1-3 with one exception. When two units are in MODES 1-3 and controlled from one Control Room one additional RO is required since 10 CFR 50.54(m)(2)(i) only requires 4 RO's when the two operating units (Units 1 and 2) are controlled from one control room. Since one RO (or SRO) must be present in the Control Room when fuel is in the reactor vessel, the two RO's required to

man the SSF for the operating units are exclusive of the one RO required for each unit. Therefore, a total of 5 RO's are required for this configuration.

The minimum staffing number for the SPOC and NLO positions is reduced by one when all three units are in MODE 4 or below. This reduction is allowed since the SSF is not required to be OPERABLE in these MODES. Therefore, there is no need for SPOC to provide a qualified individual to establish the OSC and no need for an NLO to perform SSF equipment verification.

SLC 16.13.1.a.1 requires at least one RO per unit to be present in the control room when fuel is in the reactor and one SRO to be present in the control room while in MODES 1-4. This requirement is based on 10 CFR 50.54(m)(2)(iii) and ITS 5.2.2.b. The first part of SLC 16.13.1.a.2, which requires at least one licensed operator to be in the reactor building when fuel handling operations in the reactor building were in progress, was relocated during the ITS conversion from TS Table 6.1-1, Additional Requirement 3. This requirement has existed since the initial issuance of Oconee Technical Specifications. The second part of SLC 16.13.a.2, which requires that a SRO or an SRO limited to fuel handling activities be present to directly supervise CORE ALTERATIONS including fuel loading or transfer and be assigned no other duties, is based on 10 CFR 50.54(m)(2)(iv). SLC 16.13.1.a.3 which requires an operator, in addition to those specified in ITS 5.2.2.b to supplement the control room staff if the computer for a reactor is inoperable for more than eight hours, was relocated during the ITS conversion from TS Table 6.1-1, Additional Requirement 6. This requirement has also existed since the initial issuance of Oconee Technical Specifications. SLC 16.13.1.b, which specifies the STA shall be an experienced SRO was relocated during the ITS conversion from TS 6.1.1.9.

The primary purpose of the Fire Protection Program is to minimize both the probability and consequences of postulated fires. Despite designed active and passive Fire Protection Systems installed throughout the plant, a properly trained and equipped Fire Brigade organization of at least ten (Reference 8) members is needed to provide immediate response to fires that may occur at the site. This number is the result of a corrective action from Reference 10. This Fire Brigade requirement is normally met by using one SRO (or NLO qualified to be a fire brigade leader), 4 NLOs, and 5 SPOC personnel. However, this requirement can also be met by using personnel from other organizations (e.g., Chemistry, Radiation Protection, and Security).

Fire Brigade equipment and training conform to Oconee's commitments to Appendix A to Branch Technical Position 9.5-I and supplemental NRC Staff guidelines including Nuclear Plant Functional Responsibilities, Administrative Controls and Quality Assurance.

This SLC is part of the Oconee Fire Protection Program and therefore subject to the provisions of Oconee Facility Operating License Conditions.

The following requirement was relocated from the TS 6.1.1.8 during the conversion to ITS. A training program for the fire brigade shall meet or exceed the requirements of Section 27 of the NFPA Code-1975, except that training sessions may be held quarterly.

ACTIONS    A.1

With the requirements for minimum station staffing not met, the minimum station staffing levels shall be restored within 2 hours. The 2 hour Completion Time is consistent with ITS 5.2.2.c and d which allows 2 hours to accommodate unexpected absence of on-duty shift crew members provided that immediate action is taken to restore the shift crew composition to within the minimum requirements.

REFERENCES:

1.     Oconee UFSAR, Chapter 9.5.1.
2.     Oconee Fire Protection SER dated August 11, 1978.
3.     Oconee Fire Protection Review, (currently contained in the Fire Protection DBD) as revised.
4.     Duke letter of January 16, 1978 to NRC in response to "Nuclear Plant Functional Responsibilities, Administrative Controls, and Quality Assurance".
5.     ITS 5.2.2, Amendment 300/300/300.
6.     10 CFR 50.54(m).
7.     Emergency Plan, Volume A, Section B, Figure B-8, Revision 97-01, 7/97.
8.     Emergency Plan, Volume A, Appendix 8, Spill Prevention and Control and Counter Measures Plan, Revision 98-04, 10/98.
9.     Station Chemistry Manual 2.6.
10.    Problem Investigation Report Serial No. 1-089-0001.
11.    Problem Investigation Process (PIP) Serial No. 4-O99-2987.



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16.13.5

**16.13 CONDUCT OF OPERATIONS**

**16.13.5 —DELETED—**

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