



W. R. McCollum, Jr.
Vice President

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June 8, 2000

U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTENTION: Document Control Desk

SUBJECT: Duke Energy Corporation
Docket No(s). 50-269, -270, -287
Oconee Nuclear Station Units 1, 2, and 3
Supplement to December 16, 1998, LAR
Regarding the HPI System
Technical Specification Change # 98-13

On December 16, 1998, Duke submitted a proposed license amendment for Facility Operating License Nos. DPR-38, DPR-47, and DPR-55 for Oconee Nuclear Station Units 1, 2, and 3, respectively. The license amendment request (LAR) corrects previously identified deficiencies in the Technical Specifications related to the High Pressure Injection (HPI) system.

In January 1999, a verbal request was made to include additional justification for the No Significant Hazards Consideration. This was provided in a submittal dated January 25, 1999.

In May and June 1999, the NRC Staff and Duke had several discussions (telephone calls and an onsite visit by one NRR reviewer) regarding the LAR submitted on December 16, 1998. During these discussions, the NRC Staff requested the submittal of additional information regarding the aforementioned LAR. This was provided in a submittal dated August 5, 1999.

Additional Information was also provided related to Atmospheric Dump Valve Simulator Validation in a letter dated October 20, 1999.

NRR-057

A001

In November and December 1999, the NRC Staff and Duke had several conference calls regarding the LAR and its subsequent packages. In a request for additional information (RAI) dated February 2, 2000, the NRC staff requested that Duke document responses to the issues discussed in the conference calls. This was provided in a submittal dated March 30, 2000.

In a conference call on May 16, 2000, the NRC Staff requested additional information related to the Non-licensed Operators (NLOs) ability to respond to the control room in the event of an emergency. It is unclear in the LAR dated March 30, 2000, as to how Duke assures that NLOs are available to the control room within 5 minutes. This letter addresses the measures that Duke has taken and will take to ensure that NLOs respond to the control room within 5 minutes of an emergency event or transient.

NLOs carry radios and pagers when they are performing tasks outside the control room. This allows constant communication with the Control Rooms and Work Control Center. All NLOs are required to report to the affected Control Room during an emergency or transient. Some NLOs may be performing tasks that involve securing equipment before they can report to the control room. Minimum staffing of NLOs is such that 8 are required when any Unit is in Modes 1-4.

NLO responsibilities are controlled by Operations Management Procedure (OMP) 2-01, Duties and Responsibilities of On-Shift Operations Personnel. Minimum Station Staffing is controlled by SLC, OMP 2-01 and the OPS Daily Shift Assignments sheet.

Each Unit has one NLO assigned to complete critical Abnormal Procedures (APs) and Emergency Operating Procedures (EOP) actions. The designated AP/EOP NLOs, who are assigned at the beginning of each shift, are fully qualified to perform AP/EOP actions and are normally assigned a secondary watchstation so that they will be in the Turbine Building. This allows the designated AP/EOP NLO to respond to the control room within 5 minutes. The AP/EOP NLOs are restricted to the Protected Area of the Plant during the entire shift. They do not enter containment or make trips to the Switchyard; nor are they given tasks that prevent them from responding to the

control room within 5 minutes of an emergency situation. The AP/EOP NLOs are empowered to inform supervision of assignments that may be labor intensive; thereby, preventing them from performing AP/EOP duties.

The procedure for opening the Atmospheric Dump Valves (ADV) is staged at the valves. The designated NLO does not have to report to the control room to retrieve the procedure. In a worst case scenario, the control room can dispatch the NLO via the radio or public announcement system.

Minimum Station Staffing Requirements are controlled by Selected Licensee Commitments (SLC). Simulator validations for opening the ADVs indicate that it is necessary to increase minimum staffing upon entry into condition B of the proposed technical specification. Since condition A is entered prior to entry into condition B, Operations has 72 hours to designate the additional staff. Two operators will be required to perform activities related to the ADVs, while the third operator will report to the Standby Shutdown Facility (SSF) for AP/EOP activities related to the scenario.

The Operations Shift Manager (OSM) is responsible for ensuring that Shift staffing levels are maintained per the Selected Licensees Commitment (SLC) on Minimum Station Staffing Requirements. The SLC will be revised to reflect the requirement for 3 additional NLOs for this particular response. Minimum Staffing requirements are implemented by the OPS Daily Shift Assignments Sheet. All personnel designated for specific assignments are recorded on this sheet. This includes the designated AP/EOP NLOs. The additional 3 NLOs will also be recorded on this sheet. The NLOs will not be assigned labor intensive duties that will prevent them from performing their specific emergency duties. The OPS Daily Shift Assignments sheet is provided to all shift personnel.

It is expected that OMP 2-01 and the OPS Daily Assignment Sheet will change as Operations is continually improving and refining their processes. Some changes for the future include: AP/EOP NLOs will wear identification tags that designate them as such and the AP/EOP NLO will not leave the protected area until AP/EOP NLO responsibility is properly turned over including transferring the designating

identification tag. When the SLC on Minimum Station Staffing is revised to reflect the additional 3 NLOs, the OPS Daily Shift Assignments sheet will also be revised to reflect the additional personnel. These personnel will have the same expectations as described above for the designated AP/EOP NLOs. They will be qualified individuals designated to respond to the control room within 5 minutes and will not be given duties that will prevent this from happening. They will wear identification tags and carry a radio and pager when outside the control room.

This supplement contains the following commitment:

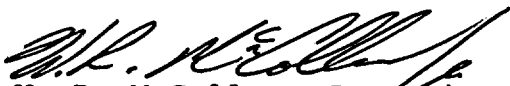
The Minimum Staffing SLC will be revised to reflect the requirement of an additional 3 operators upon entry into condition B of the proposed technical specification. Two of these operators will be designated to perform activities related to the ADVs while the third one will report to the SSF to perform other AP/EOP related activities.

Duke requests that 75 days be allowed for completion of all implementation activities related to this LAR

Pursuant to 10 CFR 50.91, a copy of this supplement to the December 16, 1998, LAR is being sent to the State of South Carolina.

Inquiries on this matter should be directed to R. V. Gambrell at (864) 885-3364.

Very truly yours,



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

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xc w/attachments:

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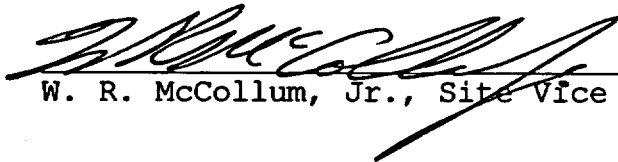
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AFFIDAVIT

W. R. McCollum, Jr., being duly sworn, states that he is Site Vice President of Duke Energy Corporation; that he is authorized on the part of said corporation to sign and file with the Nuclear Regulatory Commission this revision to the Oconee Nuclear Station License Nos. DPR-38, DPR-47, and DPR-55; and that all statements and matters set forth therein are true and correct to the best of his knowledge.


W. R. McCollum, Jr., Site Vice President

Subscribed and sworn to me: June 8, 2000
Date

Notary Public: Connie M. Dreyake

My Commission Expires: 2-12-2003
Date

SEAL

