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August 18, 2011

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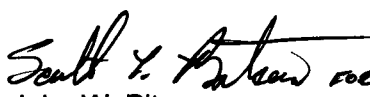
Subject: Duke Energy Carolinas, LLC
Oconee Nuclear Station, Units 1, 2, and 3
Docket Numbers 50-269, 50-270, and 50-287
Proposed Exigent Technical Specification (TS) Amendment to TS 3.10.1,
"Standby Shutdown Facility"
License Amendment Request (LAR) No. 2011-09, Supplement 2

On August 12, 2011, Duke Energy Carolinas, LLC (Duke Energy) submitted a License Amendment Request (LAR) to request approval of a one-time exigent change to extend the Completion Time (CT) of Technical Specification (TS) 3.10.1, Condition F. Duke Energy supplemented this request to provide a revised significant hazards consideration evaluation on August 15, 2011. After discussions with the NRC on August 17, 2011, Duke Energy is supplementing the LAR to revise the amount of additional time requested. This supplement provides additional information that clarifies the LAR but does not expand the scope of the LAR. The revised change is bounded by the revised determination of no significant hazards consideration submitted in Supplement 1. Enclosure 1 provides the revised change and supporting justification. Regulatory Commitments are provided in Enclosure 2. Attachment 1 provides the revised retyped TS pages. Attachment 2 provides the revised marked up TS pages.

Should you have any questions concerning this information, please call K. R. Alter at (864) 873-3255.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 18, 2011.

Sincerely,


John W. Pitesa
Senior Vice President
Nuclear Operations

Desired as
original
John Stang
8/19/11

Document Control Desk
August 18, 2011
Page 2

Enclosures and Attachments:

Enclosure 1– Supplemental Information for LAR 2011-09
Enclosure 2 – List of Regulatory Commitments
Attachment 1 - Retyped Technical Specification Pages
Attachment 2 - Marked-Up Technical Specification Pages

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August 18, 2011

Page 3

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ENCLOSURE 1

SUPPLEMENTAL INFORMATION FOR LAR 2011-09

Enclosure
Supplemental Information Associated for LAR 2011-09

1.0 Introduction

Duke Energy proposes a one-time exigent change to extend the Oconee Nuclear Station (ONS), Units 1, 2 and 3 Technical Specification (TS) 3.10.1 Required Action (RA) F.1 Completion Time (CT) by 48 hours. The additional time is needed to complete the process of restoring the fully tested pressurizer heater circuit fuses to OPERABLE status. This testing is currently expected to be completed by 1025 hours on August 19, 2011. Required Action F.1 CT will expire on August 22, 2011. Before entering the extended Completion Time, the fuses and fuse blocks will be installed and functional to support the SSF Auxiliary Service Water (ASW) safety function. This proposed change does not result in a reduction in a commitment in the Duke QA Program.

2.0 Description of Proposed Changes

Duke Energy proposes the addition of the following to Note in the Completion Time for TS 3.10.1 Required Action F.1:

An additional 48 hours is allowed to complete the process of restoring the fully tested pressurizer heater circuit fuses to OPERABLE status. This extension expires on August 24, 2011 at 1610 hours.

This note (*) will modify the 45 days in the Note and the Completion Time. This extension will allow time to complete the process of restoring the fully tested pressurizer heater circuit fuses to OPERABLE status.

3.0 Justification for Proposed Change

The proposed change extends the CT for TS 3.10.1 Required Action F.1 by 48 hours. The additional 48 hours is applicable only after installation and functional testing of the fuses and fuse blocks are complete. During the extended CT, the fuses and fuse blocks will be functional and capable of supporting the SSF ASW safety function. The remaining tasks required to declare the SSF ASW System operable are listed below (the times listed are best estimate):

- Completion of post LOCA chamber testing – 8/19 at 1025 hours
- Review and resolution of test data – 8/20 at 0600 hours (anomalies encountered during Duke Energy review and acceptance may increase this time by 24 hours)
- Receipt of Certificates of Conformance from vendor – 8/20 at 0600 hours
- Incorporate qualifications of fuses into the modification packages and declare SSF operable – 8/20 at 1800 hours (an additional 24 hours is added should problems be encountered during the review process that would cause a reiteration of this effort) – This activity includes the following activities, which are being performed in parallel:
 - Revising modification package
 - Revising associated 50.59 screening
 - Review and obtain signatures – 08/20 at 0800 hours
 - Operations Shift Manager review and concur with SSF operability - 8/20 at 1800 hours

The best estimate above shows the SSF being restored to operability by August 20, 2011, at 1800 hours. Duke Energy has listed additional time (in parenthesis after the activities listed

above) that may be needed to address potential problems encountered during the period between completion of the functional testing and declaring the SSF ASW System operable. This adds 48 hours to the schedule and is the basis for extended TS Completion Time.

During the extended time period Duke Energy will begin shutting down the ONS Units 1, 2, and 3 immediately if a determination is made that the fuses and fuse blocks become non functional. Duke will not perform any activities that will affect or degrade the functionality of the fuses and fuse blocks. There are no activities required that would affect the functionality of the fuses and fuse blocks during the period between completion of the functional testing and declaring the SSF ASW System operable. The physical condition of the fuses are not affected during the transition period. The modification was performed under the 10 CFR 50.59 process and the fuses are being tested in accordance with Duke Energy's QA-1 plan.

The temperature being used for fuse testing bounds the maximum temperatures for the duration of a 4-hour Station Blackout (SBO) event and a 72-hour period with loss of containment cooling.

Duke Energy will also take compensatory measures, as described below, to minimize the impact of events that could cause a loss of containment cooling.

4.0 Compensatory Measures to Minimize Impact of Events

During the extended Completion Time, Duke Energy will take compensatory measures described below to minimize the likelihood and impact of events that could cause a loss of AC power to the normal and backup containment cooling systems for an extended period of time.

High Energy Line Break (HELB)

A high energy line break in auxiliary steam and main feedwater piping adjacent to the 4 kV Switchgear could cause a loss of all AC power to containment cooling systems on a unit specific basis. Duke Energy will perform walkdowns, once per shift, to inspect for degraded conditions (the presence of steam) affecting the likelihood of a HELB that could affect 4 kV Switchgear.

Turbine Building (TB) flood

TB flood events are not dominant SSF scenarios and would not lead to a loss of all AC power. In this case, the normal containment cooling system would be expected to be available for all but the most severe TB floods which cause failure of the LPSW pumps needed for Reactor Building Cooling Unit (RBCU) operation. Duke Energy will perform walkdowns, each shift to inspect visible portions of Condenser Circulating Water (CCW), for degraded conditions affecting the likelihood of a TB Flood in the following areas:

1. CCW Condenser Inlet Piping
2. CCW Condenser Inlet Expansion Joint
3. CCW Condenser Outlet Piping
4. CCW Condenser Outlet Expansion Joint
5. CCW Emergency Discharge Piping (24" and 30" diameter piping only)
6. CCW Crossover / LPSW Suction Piping

7. CCW Unwatering Piping
8. CCW Condensate Cooler Inlet Piping
9. CCW Condensate Cooler Outlet Piping
10. CCW RCW Inlet Piping (18" diameter or larger)
11. CCW RCW Outlet Piping (18" diameter or larger)

TB Fire

A TB fire could cause loss of all AC power to the containment cooling systems. Duke Energy currently performs fire watches in the TB (until NFPA 805 is implemented; not scheduled within this time frame) and will continue these fire watches during the extended Completion Time.

Tornado

The period of reduced susceptibility to the occurrence of a tornado at the ONS site is during the late summer when tornado activity and intensity in the southeastern US is significantly lower. Historical data shows that the Oconee tornado strike frequency is approximately 2.8 times lower than the annual average value during this time. The tornado would have to take out normal power as well as Keowee and the Lee Combustion Turbines (LCT). As part of the Natural Phenomenon Barrier System, Duke Energy has installed Fiber Reinforced Polymer (FRP) material on Auxiliary Building walls to protect SSF equipment located in the west penetration room from the effects of damage due to differential loads from a design basis tornado.

External Flood

Duke Energy has implemented various compensatory measures to mitigate the effects of an external flood.

Loss of all AC Power Events

To provide compensatory measures for the loss of AC power events similar to those described above, the Keowee Hydro Station will be a protected power source, and there will be a dedicated line from the LCT. The use of the Protected Equipment Program for the Keowee Hydro Station will avoid adverse impacts to the hydroelectric station. In addition, the Protected Train Program will also be applied to the Keowee Hydro Unit Underground Path, the Switchyard, the Turbine-Driven Emergency Feedwater Pump, 4kV Switchgears B1T and B2T, and Engineered Safeguards Buses TC, TD, and TE on each unit.

The Protected Train Program is defined by ONS procedures and is designed to:

- Prevent plant transients
- Prevent inadvertent entry into TS 3.0.3
- Prevent loss of equipment required to ensure safe shutdown conditions, and
- To control overall plant risk during evolutions, maintenance, or testing.

The primary purpose of protecting equipment under this program is to ensure that the equipment is available for normal operations and for mitigating abnormal or emergency conditions. The protected equipment for this extended AOT period will be posted at the equipment and communicated to Operations Shift personnel at the beginning of each shift, and to the rest of the site at the Plan of the Day meeting, and will be listed on the Operations Daily Status Sheets. In-place protected equipment postings will be discussed during all turnovers and checked on Nuclear Equipment Operator rounds to ensure postings are in place, unauthorized work is not in progress, and work is not in progress in the vicinity that could impact the equipment being protected. Physical barriers will be used whenever possible, especially if bumping into a component may cause an inadvertent trip or system transient. Surveillances or intrusive work on posted protected equipment is normally not allowed, and if permitted, must be approved by Duty Superintendent of Operations or the on duty Operations Shift Manager, respectively.

ENCLOSURE 2**LIST OF REGULATORY COMMITMENTS**

The following commitment table identifies those actions committed to by Duke Energy Carolinas, LLC (Duke Energy) in this submittal. Other actions discussed in the submittal represent intended or planned actions by Duke Energy. They are described to the Nuclear Regulatory Commission (NRC) for the NRC's information and are not regulatory commitments.

	Commitment	Completion Date
1	Duke Energy will begin shutting down the ONS Units 1, 2, and 3 immediately if a determination is made that the fuses and fuse blocks become non functional.	During extended Completion Time
2	Duke Energy will perform walkdowns, once per shift, to inspect for degraded conditions (the presence of steam) affecting the likelihood of a HELB that could affect 4 kV Switchgear.	During extended Completion Time
3	<p>Duke Energy will perform walkdowns, each shift to inspect visible portions of Condenser Circulating Water (CCW), for degraded conditions affecting the likelihood of a TB Flood in the following areas:</p> <ol style="list-style-type: none"> 1. CCW Condenser Inlet Piping 2. CCW Condenser Inlet Expansion Joint 3. CCW Condenser Outlet Piping 4. CCW Condenser Outlet Expansion Joint 5. CCW Emergency Discharge Piping (24" and 30" diameter piping only) 6. CCW Crossover / LPSW Suction Piping 7. CCW Unwatering Piping 8. CCW Condensate Cooler Inlet Piping 9. CCW Condensate Cooler Outlet Piping 10. CCW RCW Inlet Piping (18" diameter or larger) 11. CCW RCW Outlet Piping (18" diameter or larger) 	During extended Completion Time
4	The Keowee Hydro Station will be a protected power source, and there will be a dedicated line from the LCT. The use of the Protected Equipment Program for the Keowee Hydro Station will avoid adverse impacts to the hydroelectric station. In addition, the Protected Train Program will also be applied to the Keowee Hydro Unit Underground Path, the Switchyard, the Turbine-Driven Emergency Feedwater Pump, 4kV Switchgears B1T and B2T, and Engineered Safeguards Buses TC, TD, and TE on each unit.	During extended Completion Time
5	Existing commitment: Duke Energy currently performs fire watches in the TB (until NFPA 805 is implemented; not scheduled within this time frame) and will continue these fire watches during the extended Completion Time.	Ongoing
6	Existing commitment: Duke Energy has implemented various compensatory measures to mitigate the effects of an external flood.	Ongoing

ATTACHMENT 1

RETYPE TECHNICAL SPECIFICATION PAGES

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. SSF Reactor Coolant Makeup System inoperable.	C.1 Restore SSF Reactor Coolant Makeup System to OPERABLE status.	7 days
D. SSF Power System inoperable.	D.1 Restore SSF Power System to OPERABLE status.	7 days
E. SSF Instrumentation inoperable.	E.1 Restore SSF Instrumentation to OPERABLE status.	7 days
F. Required Action and associated Completion Time of Condition A, B, C, D, or E not met when SSF Systems or Instrumentation are inoperable due to maintenance.	F.1 Restore to OPERABLE status.	<p>-----NOTE----- Not to exceed 45 days cumulative per calendar year*</p> <p>45 days from discovery of initial inoperability*</p>
G. Required Action and associated Completion Time of Condition F not met. <u>OR</u> Required Action and associated Completion Time of Condition A, B, C, D, or E not met for reasons other than Condition F.	G.1 Be in MODE 3. <u>AND</u> G.2 Be in MODE 4.	12 hours 84 hours

* An additional 48 hours is allowed to complete the process of restoring the fully tested pressurizer heater circuit fuses to OPERABLE status. This extension expires on August 24, 2011 at 1610 hours.

ATTACHMENT 2

MARKED-UP TECHNICAL SPECIFICATION PAGES

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. SSF Reactor Coolant Makeup System inoperable.	C.1 Restore SSF Reactor Coolant Makeup System to OPERABLE status.	7 days
D. SSF Power System inoperable.	D.1 Restore SSF Power System to OPERABLE status.	7 days
E. SSF Instrumentation inoperable.	E.1 Restore SSF Instrumentation to OPERABLE status.	7 days
F. Required Action and associated Completion Time of Condition A, B, C, D, or E not met when SSF Systems or Instrumentation are inoperable due to maintenance.	F.1 Restore to OPERABLE status.	<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;">*</div> <p>----- NOTE ----- Not to exceed 45 days cumulative per calendar year -----</p> <p>45 days from discovery of initial inoperability</p>
G. Required Action and associated Completion Time of Condition F not met. <u>OR</u> Required Action and associated Completion Time of Condition A, B, C, D, or E not met for reasons other than Condition F.	G.1 Be in MODE 3. <u>AND</u> G.2 Be in MODE 4.	12 hours 84 hours

← An additional 48 hours is allowed to complete the process of restoring the fully tested pressurizer heater circuit fuses to OPERABLE status. This extension expires on August 24, 2011 at 1610 hours.