

Table 3.3.8-1 (page 1 of 1)
Post Accident Monitoring Instrumentation

FUNCTION	REQUIRED CHANNELS	CONDITIONS REFERENCED FROM REQUIRED ACTION G.1
1. Wide Range Neutron Flux	2	H
2. RCS Hot Leg Temperature	2	H
3. RCS Hot Leg Level	2	I
4. RCS Pressure (Wide Range)	2	H
5. Reactor Vessel Head Level	2	I
6. Containment Sump Water Level (Wide Range)	2	H
7. Containment Pressure (Wide Range)	2	H
8. Containment Isolation Valve Position	2 per penetration flow path (a)(b)(c)	H
9. Containment Area Radiation (High Range)	2	I
10. Containment Hydrogen Concentration	2	H
11. Pressurizer Level	2	H
12. Steam Generator Water Level	2 per SG	H
13. Steam Generator Pressure	2 per SG	H
14. Borated Water Storage Tank Water Level	2	H
15. Upper Surge Tank Level	2	H
16. Core Exit Temperature	2 independent sets of 5 ^(d)	H
17. Subcooling Monitor	2	H
18. HPI System Flow	1 per train	NA
19. LPI System Flow	1 per train	NA
20. Reactor Building Spray Flow	1 per train	NA
21. Emergency Feedwater Flow	2 per SG	H
22. Low Pressure Service Water Flow to LPI Coolers	1 per train	NA

- (a) Not required for isolation valves whose associated penetration is isolated by at least one closed and deactivated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured.
- (b) Only one position indication channel is required for penetration flow paths with only one installed control room indication channel.
- (c) Position indication requirements apply only to containment isolation valves that are electrically controlled.
- (d) The subcooling margin monitor takes the average of the five highest CETs for each of the ICCM trains.

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ATTACHMENT 2
TECHNICAL SPECIFICATION MARKUP

Table 3.3.8-1 (page 1 of 1)
Post Accident Monitoring Instrumentation

FUNCTION	REQUIRED CHANNELS	CONDITIONS REFERENCED FROM REQUIRED ACTION G.1
1. Wide Range Neutron Flux	2	H
2. RCS Hot Leg Temperature	2 (per loop)	H
3. RCS Hot Leg Level	2	I
4. RCS Pressure (Wide Range)	2	H
5. Reactor Vessel Head Level	2	I
6. Containment Sump Water Level (Wide Range)	2	H
7. Containment Pressure (Wide Range)	2	H
8. Containment Isolation Valve Position	2 per penetration flow path (a)(b)(c)	H
9. Containment Area Radiation (High Range)	2	I
10. Containment Hydrogen Concentration	2	H
11. Pressurizer Level	2	H
12. Steam Generator Water Level	2 per SG	H
13. Steam Generator Pressure	2 per SG	H
14. Borated Water Storage Tank Water Level	2	H
15. Upper Surge Tank Level	2	H
16. Core Exit Temperature	2 independent sets of 5 ^(d)	H
17. Subcooling Monitor	2	H
18. HPI System Flow	1 per train	NA
19. LPI System Flow	1 per train	NA
20. Reactor Building Spray Flow	1 per train	NA
21. Emergency Feedwater Flow	2 per SG	H
22. Low Pressure Service Water Flow to LPI Coolers	1 per train	NA

- (a) Not required for isolation valves whose associated penetration is isolated by at least one closed and deactivated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured.
- (b) Only one position indication channel is required for penetration flow paths with only one installed control room indication channel.
- (c) Position indication requirements apply only to containment isolation valves that are electrically controlled.
- (d) The subcooling margin monitor takes the average of the five highest CETs for each of the ICCM trains.

Attachment 3

Technical Justification

Background

The ONS ITS conversion consolidated Regulatory Guide 1.97 Category I and Type A variables that were in existing technical specifications into one specification (ITS 3.3.8) and added Category I or Type A variables that were previously not included in Technical Specifications. Inclusion in ITS was based on the guidance provided by NUREG 1430, Rev. 1. During the ONS ITS conversion, Duke incorrectly specified the RCS Hot Leg Temperature Function as having two channels per loop. This was discovered subsequent to receipt of the NRC Safety Evaluation for the ITS Submittal.

Description of the Technical Specification Change

ITS Table 3.3.8-1 is modified to only require two channels for the RCS Hot Leg Temperature Function. The Technical Specifications currently require two channels of the RCS Hot Leg Temperature Function per loop. This requirement was specified incorrectly during the ITS conversion. There are only two Regulatory Guide 1.97 qualified channels for this function.

Technical Justification

The ONS Regulatory Guide 1.97 submittal (Reference 1), the NRC Safety Evaluation Report for the ONS Regulatory Guide 1.97 submittal (Reference 2), UFSAR Section 7.5.2.16 (Reference 3), and the ITS 3.3.8 Bases describe the RCS Hot Leg Temperature Function as having two qualified channels. However, ITS Table 3.3.8-1, Item 2 incorrectly specifies two channels per loop rather than correctly specifying two channels for the function. NUREG 1430, Rev. 1 specifies two channels per loop. Duke failed to remove the "per loop" requirement during the conversion to ITS. The ITS Bases was correctly revised to describe the number of required channels as two and is in conflict with the ITS Specification.

As a result, when ITS is implemented, each unit will be required to enter Condition A of ITS 3.3.8 for each loop since there is only one Regulatory Guide 1.97 instrument per loop installed. Entry into Condition B will be required after 30 days, which

Attachment 3

Technical Justification

requires action to be initiated in accordance with ITS 5.6.6 immediately. ITS 5.6.6 requires that a Special Report be submitted within the following 14 days outlining the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status. Oconee's plan for restoring the instrumentation channels is to revise the requirement to be consistent with the design.

The proposed change is justified since it corrects an error made during ITS conversion and makes the Technical Specifications consistent with the ONS Regulatory Guide 1.97 submittal, UFSAR Section 7.5.2.16, and the NRC's Safety Evaluation for the ONS Regulatory Guide 1.97 submittal.

References

1. Duke Power Company letter from Hal B. Tucker to Harold M. Denton (NRC) dated September 28, 1984.
2. NRC Letter from Helen N. Pastis to H. B. Tucker, "Emergency Response Capability - Conformance to Regulatory Guide 1.97," dated March 15, 1988.
3. UFSAR, Section 7.5.

Attachment 4

No Significant Hazards Determination

Pursuant to 10 CFR 50.91, Duke Power Company (Duke) has made the determination that this amendment request involves a No Significant Hazards Consideration by applying the standards established by the NRC regulations in 10 CFR 50.92. This ensures that operation of the facility in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated:

The proposed change modifies ITS Table 3.3.8-1 to only require two channels for RCS Hot Leg Temperature Function. These instruments provide indication only and are not considered as initiators of any analyzed event. The proposed change does not involve a physical alteration of the plant. No new or different equipment is being installed, and no installed equipment is being operated in a new or different manner. No set points for parameters which initiate protective or mitigative action are being changed. Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

- (2) Create the possibility of a new or different kind of accident from any kind of accident previously evaluated:

The proposed change does not involve a physical alteration of the plant. No new or different equipment is being installed, and no installed equipment is being operated in a new or different manner. No set points for parameters which initiate protective or mitigative action are being changed. As a result, no new failure modes are being introduced. Therefore, this proposed amendment will not create the possibility of any new or different kind of accident.

Attachment 4

No Significant Hazards Determination

- (3) Involve a significant reduction in a margin of safety.

The margin of safety for PAM instrumentation is based on the availability and capability of the instrumentation to provide the required operator information. The proposed change maintains requirements within the safety analyses and licensing basis and has no effect on the availability and capability of the PAM function. Therefore, the change does not involve a significant reduction in a margin of safety.

Duke has concluded, based on the above, that there are no significant hazards considerations involved in this amendment request.

Attachment 5

Environmental Assessment

Pursuant to 10 CFR 51.22(b), an evaluation of the license amendment request (LAR) has been performed to determine whether or not it meets the criteria for categorical exclusion set forth in 10 CFR 51.22(c)9 of the regulations. The LAR does not involve:

- 1) A significant hazards consideration.

This conclusion is supported by the determination of no significant hazards contained in Attachment 4.

- 2) A significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

This LAR will not change the types or amounts of any effluents that may be released offsite.

- 3) A significant increase in the individual or cumulative occupational radiation exposure.

This LAR will not increase the individual or cumulative occupational radiation exposure.

In summary, this LAR meets the criteria set forth in 10 CFR 51.22 (c)9 of the regulations for categorical exclusion from an environmental impact statement.