

Attachment 1

Duke Power Company
Oconee Nuclear Station

Proposed Technical Specification Revision
Oconee 2 Cycle 7

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1. The 1.30 DNBR limit produced by the combination of the radial peak, axial peak and position of the axial peak that yields no less than a 1.30 DNBR.
2. The combination of radial and axial peak that causes central fuel melting at the hot spot. The limit is 20.4 kw/ft for fuel rod burnup less than or equal to 10,000 MWD/MTU and 21.2 kw/ft after 10,000 MWD/MTU.

Power peaking is not a directly observable quantity, and, therefore, limits have been established on the bases of the reactor power imbalance produced by the power peaking.

The specified flow rates 2.1-3B correspond to the expected minimum flow rates with four pumps, three pumps, and one pump in each loop, respectively.

The curve of Figure 2.1-1B is the most restrictive of all possible reactor coolant pump-maximum thermal power combinations shown in Figure 2.1-3B.

The magnitude of the rod bow penalty applied to each fuel cycle is equal to or greater than the necessary burnup dependent DNBR rod bow penalty for the applicable cycle minus a credit of 1% for the flow area reduction factor used in the hot channel analysis. All plant operating limits are based on a minimum DNBR criteria of 1.30 plus the amount necessary to offset the reduction in DNBR due to fuel rod bow. (3)

The maximum thermal power for three-pump operation is 88.07 percent due to a power level trip produced by the flux-flow ratio $74.7 \text{ percent flow} \times 1.07 = 79.92 \text{ percent power}$ plus the maximum calibration and instrument error. The maximum thermal power for other coolant pump conditions are produced in a similar manner.

For each curve of Figure 2.1-3B, a pressure-temperature point above and to the left of the curve would result in a DNBR greater than 1.30 or a local quality at the point of minimum DNBR less than 22 percent for that particular reactor coolant pump situation. The curve of Figure 2.1-1B is the most restrictive of all possible reactor coolant pump-maximum thermal power combinations shown in Figure 2.1-3B.

References

- (1) Correlation of Critical Heat Flux in a Bundle Cooled by Pressurizer Water, BAW-10000, March 1970.
- (2) Oconee 2, Cycle 4 - Reload Report, BAW-1491, August 1978.
- (3) Oconee 2, Cycle 7 - Reload Report, DPC-RD-2002, August 1983.

During normal plant operation with all reactor coolant pumps operating, reactor trip is initiated when the reactor power level reaches 105.5% of rated power. Adding to this the possible variation in trip setpoints due to calibration and instrument errors, the maximum actual power at which a trip would be actuated could be 112%, which is more conservative than the value used in the safety analysis. (4)

Overpower Trip Based on Flow and Imbalance

The power level trip set point produced by the reactor coolant system flow is based on a power-to-flow ratio which has been established to accommodate the most severe thermal transient considered in the design, the loss-of-coolant flow accident from high power. Analysis has demonstrated that the specified power-to-flow ratio is adequate to prevent a DNBR of less than 1.3 should a low flow condition exist due to any electrical malfunction.

The power level trip setpoint produced by the power-to-flow ratio provides both high power level and low flow protection in the event the reactor power level increases or the reactor coolant flow rate decreases. The power level trip setpoint produced by the power-to-flow ratio provides overpower DNB protection for all modes of pump operation. For every flow rate there is a maximum permissible power level, and for every power level there is a minimum permissible low flow rate. Typical power level and low flow rate combinations for the pump situations of Table 2.3-1A are as follows:

1. Trip would occur when four reactor coolant pumps are operating if power is 107% and reactor flow rate is 100%, or flow rate is 93.46% and power level is 100%.
2. Trip would occur when three reactor coolant pumps are operating if power is 79.92% and reactor flow rate is 74.7% or flow rate is 70.09% and power level is 75%.
3. Trip would occur when one reactor coolant pump is operating in each loop (total of two pumps operating) if the power is 52.43% and reactor flow rate is 49.0% or flow rate is 45.79% and the power level is 49%.

The flux-to-flow ratios account for calibration and instrument errors and the maximum variation from the RC flow signal in such a manner that the reactor protective system receives a conservative indication of RC flow. For units 1 and 3, the maximum calibration and instrument errors are algebraically summed to determine the string errors in the safety calculations. Unit 2 employs a Monte-Carlo simulation technique with final string errors corresponding to the 95/95 tolerance limits.

The power-imbalance boundaries are established in order to prevent reactor thermal limits from being exceeded. These thermal limits are either power peaking kw/ft limits or DNBR limits. The reactor power imbalance (power in the top half of core minus power in the bottom half of core) reduces the power level trip produced by the power-to-flow ratio such that the boundaries of Figure 2.3-2A - Unit 1 are produced. The power-to-flow ratio reduces the power

2.3-2B - Unit 2
2.3-2C - Unit 3

level trip and associated reactor power/reactor power-imbalance boundaries by 1.07% - Unit 1 for 1% flow reduction.

- 1.07% - Unit 2
- 1.08% - Unit 3

Pump Monitors

The pump monitors prevent the minimum core DNBR from decreasing below 1.3 by tripping the reactor due to the loss of reactor coolant pump(s). The circuitry monitoring pump operational status provides redundant trip protection for DNB by tripping the reactor on a signal diverse from that of the power-to-flow ratio. The pump monitors also restrict the power level for the number of pumps in operation.

Reactor Coolant System Pressure

During a startup accident from low power or a slow rod withdrawal from high power, the system high pressure setpoint is reached before the nuclear over-power trip setpoint. The trip setting limit shown in Figure 2.3-1A - Unit 1

- 2.3-1B - Unit 2
- 2.3-1C - Unit 3

for high reactor coolant system pressure (2300 psig) has been established to maintain the system pressure below the safety limit (2750 psig) for any design transient. (1)

The low pressure (1800) psig and variable low pressure (11.14 T^{out}-4706) trip (1800) psig (11.14 T^{out}-4706) (1800) psig (11.14 T^{out}-4706)

setpoints shown in Figure 2.3-1A have been established to maintain to DNB 2.3-1B 2.3-1C

ratio greater than or equal to 1.3 for those design accidents that result in a pressure reduction. (2,3)

Due to the calibration and instrumentation errors the safety analysis used a variable low reactor coolant system pressure trip value of (11.14 T^{out} - 4746) (11.14 T^{out} - 4746) (11.14 T^{out} - 4746)

Coolant Outlet Temperature

The high reactor coolant outlet temperature trip setting limit (618°F) shown in Figure 2.3-1A has been established to prevent excessive core coolant

- 2.3-1B
- 2.3-1C

temperatures in the operating range. Due to calibration and instrumentation errors, the safety analysis used a trip setpoint of 620°F.

Reactor Building Pressure

The high reactor building pressure trip setting limit (4 psig) provides positive assurance that a reactor trip will occur in the unlikely event of a loss-of-coolant accident, even in the absence of a low reactor coolant system pressure trip.

Table 2.3-1A
Unit 1

Reactor Protective System Trip Setting Limits

RPS Segment	Four Reactor Coolant Pumps Operating (Operating Power 100% Rated)	Three Reactor Coolant Pumps Operating (Operating Power -75% Rated)	One Reactor Coolant Pump Operating In Each Loop (Operating Power -49% Rated)	Shutdown Bypass
1. Nuclear Power Max. (% Rated)	105.5	105.5	105.5	5.0 ⁽³⁾
2. Nuclear Power Max. Based on Flow (2) and Imbalance, (% Rated)	1.07 times flow minus reduction due to imbalance	1.07 times flow minus reduction due to imbalance	1.07 times flow minus reduction due to imbalance	Bypassed
3. Nuclear Power Max. Bases on Pump Monitors, (% Rated)	NA	NA	55%	Bypassed
4. High Reactor Coolant System Pressure, psig, Max.	2300	2300	2300	1720 ⁽⁴⁾
5. Low Reactor Coolant System Pressure, psig, Min.	1800	1800	1800	Bypassed
6. Variable Low Reactor Coolant System Pressure psig, Min.	$(11.14 T_{out} - 4706)^{(1)}$	$(11.14 T_{out} - 4706)^{(1)}$	$(11.14 T_{out} - 4706)^{(1)}$	Bypassed
7. Reactor Coolant Temp. F., Max.	618	618	618	618
8. High Reactor Building Pressure, psig, Max.	4	4	4	4

(1) T_{out} is in degrees Fahrenheit (°F).

(2) Reactor Coolant System Flow, %.

(3) Administratively controlled reduction set
only during reactor shutdown.

(4) Automatically set when other segments of
the RPS are bypassed.

Table 2.3-1B
Unit 2

Reactor Protective System Trip Setting Limits

<u>RPS Segment</u>	<u>Four Reactor Coolant Pumps Operating (Operating Power -100% Rated)</u>	<u>Three Reactor Coolant Pumps Operating (Operating Power -75% Rated)</u>	<u>One Reactor Coolant Pump Operating in Each Loop (Operating Power -49% Rated)</u>	<u>Shutdown Bypass</u>
1. Nuclear Power Max. (% Rated)	105.5	105.5	105.5	5.0 ⁽³⁾
2. Nuclear Power Max. Based on Flow (2) and Imbalance, (% Rated)	1.07 times flow minus reduction due to imbalance	1.07 times flow minus reduction due to imbalance	1.07 times flow minus reduction due to imbalance	Bypassed
3. Nuclear Power Max. Based on Pump Monitors, (% Rated)	NA	NA	55%	Bypassed
4. High Reactor Coolant System Pressure, psig, Max.	2300	2300	2300	1720 ⁽⁴⁾
5. Low Reactor Coolant System Pressure, psig, Min.	1800	1800	1800	Bypassed
6. Variable Low Reactor Coolant System Pressure psig, Min.	$(11.14 T_{out} - 4706)^{(1)}$	$(11.14 T_{out} - 4706)^{(1)}$	$(11.14 T_{out} - 4706)^{(1)}$	Bypassed
7. Reactor Coolant Temp. F., Max.	618	618	618	618
8. High Reactor Building Pressure, psig, Max.	4	4	4	4

(1) T_{out} is in degrees Fahrenheit (°F).

(2) Reactor Coolant System Flow, %.

(3) Administratively controlled reduction
set only during reactor shutdown.

(4) Automatically set when other segments
of the RPS are bypassed.

Table 2.3-1C
Unit 3

Reactor Protective System Trip Setting Limits

<u>RPS Segment</u>	<u>Four Reactor Coolant Pumps Operating (Operating Power -100% Rated)</u>	<u>Three Reactor Coolant Pumps Operating (Operating Power -75% Rated)</u>	<u>One Reactor Coolant Pump Operating in Each Loop (Operating Power -49% Rated)</u>	<u>Shutdown Bypass</u>
1. Nuclear Power Max. (% Rated)	105.5	105.5	105.5	5.0 ⁽³⁾
2. Nuclear Power Max. Based on Flow (2) and Imbalance, (% Rated)	1.08 times flow minus reduction due to imbalance	1.08 times flow minus reduction due to imbalance	1.08 times flow minus reduction due to imbalance	Bypassed
3. Nuclear Power Max. Based on Pump Monitors, (% Rated)	NA	NA	55%	Bypassed
4. High Reactor Coolant System Pressure, psig, Max.	2300	2300	2300	1720 ⁽⁴⁾
5. Low Reactor Coolant System Pressure, psig, Min.	1800	1800	1800	Bypassed
6. Variable Low Reactor Coolant System Pressure psig, Min.	$(11.14 T_{out} - 4706)^{(1)}$	$(11.14 T_{out} - 4706)^{(1)}$	$(11.14 T_{out} - 4706)^{(1)}$	Bypassed
7. Reactor Coolant Temp. F., Max.	618	618	618	618
8. High Reactor Building Pressure, psig, Max.	4	4	4	4

(1) T_{out} is in degrees Fahrenheit (°F).

(2) Reactor Coolant System Flow, %.

(3) Administratively controlled reduction
set only during reactor shutdown.

(4) Automatically set when other segments
of the RPS are bypassed.

- f. If the maximum positive quadrant power tilt exceeds the Maximum Limit of Table 3.5-1, the reactor shall be shut down within 4 hours. Subsequent reactor operation is permitted for the purpose of measurement, testing, and corrective action provided the thermal power and the Nuclear Overpower Trip Setpoints allowable for the reactor coolant pump combination are restricted by a reduction of 2% of thermal power for each 1% tilt for the maximum tilt observed prior to shutdown.
- g. Quadrant power tilt shall be monitored on a minimum frequency of once every 2 hours during power operation above 15% full power.

3.5.2.5 Control Rod Positions

- a. Technical Specification 3.1.3.5 does not prohibit the exercising of individual safety rods as required by Table 4.1-2 or apply to inoperable safety rod limits in Technical Specification 3.5.2.2.
- b. Except for physics tests, operating rod group overlap shall be $25\% \pm 5\%$ between two sequential groups. If this limit is exceeded, corrective measures shall be taken immediately to achieve an acceptable overlap. Acceptable overlap shall be attained within two hours or the reactor shall be placed in a hot shutdown condition within an additional 12 hours.
- c. Position limits are specified for regulating and axial power shaping control rods. Except for physics tests or exercising control rods, the regulating control rod insertion/withdrawal limits are specified on figures 3.5.2-1A1 and 3.5.2-1A2, (Unit 1); 3.5.2-1B1, 3.5.2-1B2, and 3.5.2-1B3 (Unit 2); 3.5.2-1C1, 3.5.2-1C2, and 3.5.2-1C3 (Unit 3) for four pump operation, on figures 3.5.2-2A1 and 3.5.2-2A2, (Unit 1); 3.5.2-2B1, 3.5.2-2B2, and 3.5.2-2B3 (Unit 2); figures 3.5.2-2C1, 3.5.2-2C2, and 3.5.2-2C3 (Unit 3) for three pump operation, and on figures 3.5.2-2A3, and 3.5.2-2A4, (Unit 1); 3.5.2-2B4, 3.5.2-2B5, and 3.5.2-2B6 (Unit 2); figures 3.5.2-2C4, 3.5.2-2C5, and 3.5.2-2C6 (Unit 3) for two pump operation. Also, excepting physics tests or exercising control rods, the axial power shaping control rod insertion/withdrawal limits are specified on figures 3.5.2-4A1, and 3.5.2-4A2 (Unit 1); 3.5.2-4B1 (Unit 2); 3.5.2-4C1, 3.5.2-4C2, and 3.5.2-4C3 (Unit 3).

If the control rod position limits are exceeded, corrective measures shall be taken immediately to achieve an acceptable control rod position. An acceptable control rod position shall then be attained within two hours. The minimum shutdown margin required by Specification 3.5.2.1 shall be maintained at all times.

3.5.2.6 Xenon Reactivity

Except for physics tests, reactor power shall not be increased above the power-level-cutoff shown in Figures 3.5.2-1A1, and 3.5.2-1A2, for Unit 1; Figures 3.5.2-1B1, 3.5.2-1B2, and 3.5.2-1B3, for Unit 2; and Figures 3.5.2-1C1, 3.5.2-1C2, and 3.5.2-1C3 for Unit 3 unless one of the following conditions is satisfied:

1. Xenon reactivity did not deviate more than 10 percent from the equilibrium value for operation at steady state power.
2. Xenon reactivity deviated more than 10 percent but is now within 10 percent of the equilibrium value for operation at steady state rated power and has passed its final maximum or minimum peak during its approach to its equilibrium value for operation at the power level cutoff.
3. Except for xenon free startup (when 2. applies), the reactor has operated within a range of 87 to 92 percent of rated thermal power for a period exceeding 2 hours.

3.5.2.7 Reactor power imbalance shall be monitored on a frequency not to exceed two hours during power operation above 40 percent rated power. Except for physics tests, imbalance shall be maintained within the envelope defined by Figures 3.5.2-3A1, 3.5.2-3A2, 3.5.2-3B1, 3.5.2-3B2, 3.5.2-3C1, 3.5.2-3C2, and 3.5.2-3C3. If the imbalance is not within the envelope defined by these figures, corrective measures shall be taken to achieve an acceptable imbalance. If an acceptable imbalance is not achieved within two hours, reactor power shall be reduced until imbalance limits are met.

3.5.2.8 The control rod drive patch panels shall be locked at all times with limited access to be authorized by the manager or his designated alternate.

3.5.2.9 The operational limit curves of Technical Specifications 3.5.2.5.c and 3.5.2.7 are valid for a nominal design cycle length, as defined in the Safety Evaluation Report for the appropriate unit and cycle. Operational beyond the nominal design cycle length is permitted provided that an evaluation is performed to verify that the operational limit curves are valid for extended operation. If the operational limit curves are not valid for the extended period of the operation, appropriate limits will be established and the Technical Specification curves will be modified as required.

Bases

Operation at power with an inoperable control rod is permitted within the limits provided. These limits assure that an acceptable power distribution is maintained and that the potential effects of rod misalignment on associated accident analyses are minimized. For a rod declared inoperable due to misalignment, the rod with the greatest misalignment shall be evaluated first. Additionally, the position of the rod declared inoperable due to misalignment shall not be included in computing the average position of the group for determining the operability of rods with lesser misalignments. When a control rod is declared inoperable, boration may be initiated to achieve the existence of 1% $\Delta k/k$ hot shutdown margin.

The power-imbalance envelope defined in Figures 3.5.2-3A1, 3.5.2-3A2, 3.5.2-3B1, 3.5.2-3B2, 3.5.2-3C1, 3.5.2-3C2 and 3.5.2-3C3 is based on LOCA analyses which have defined the maximum linear heat rate (see Figure 3.5.2-5) such that the maximum clad temperature will not exceed the Final Acceptance Criteria. Corrective measures will be taken immediately should the indicated quadrant tilt, rod position, or imbalance be outside their specified boundary. Operation in a situation that would cause the Final Acceptance Criteria to be approached should a LOCA occur is highly improbable because all of the power distribution parameters (quadrant tilt, rod position, and imbalance) must be at their limits while simultaneously all other engineering and uncertainty factors are also at their limits.** Conservatism is introduced by application of:

- a. Nuclear uncertainty factors
- b. Thermal calibration
- c. Fuel densification power spike factors (Units 1 and 2 only)
- d. Hot rod manufacturing tolerance factors
- e. Fuel rod bowing power spike factors

The $25\% \pm 5\%$ overlap between successive control rod groups is allowed since the worth of a rod is lower at the upper and lower part of the stroke. Control rods are arranged in groups or banks defined as follows:

<u>Group</u>	<u>Function</u>
1	Safety
2	Safety
3	Safety
4	Safety
5	Regulating
6	Regulating
7	Xenon transient override
8	APSR (axial power shaping bank)

** Actual operating limits depend on whether or not incore or excore detectors are used and their respective instrument calibration errors. The method used to define the operating limits is defined in plant operating procedures.

Duke Power Company
Oconee Nuclear Station

Attachment 2

No Significant Hazards Consideration Evaluation

No Significant Hazards Consideration Evaluation
for Oconee 2 Cycle 7 Reload

Duke Power has made the determination that this amendment request involves no significant hazards under the Commission's 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; or
- (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) involve a significant reduction in a margin of safety.

Guidance has been supplied by the Commission concerning the application of these standards by providing certain examples (48 FR 14870). Example (iii) of the types of amendments not likely to involve significant hazards considerations applies in this case as the reload is for a nuclear power reactor. This assumes:

- (1) no fuel assemblies significantly different from those found previously acceptable to the NRC for a previous core at the facility in question are involved; and
- (2) no significant changes are made to the acceptance criteria for the Technical Specifications; and
- (3) that the analytical methods used to demonstrate conformance with the Technical Specifications and regulations are not significantly changed; and
- (4) that the NRC has previously found such methods acceptable.

This reload does not involve fuel assemblies significantly different from those found previously acceptable to the NRC. In this reload, out of a total of 177 fuel assemblies to be inserted into the core, only one assembly is slightly different. This Advanced Cladding Pathfinder (ACP) assembly, contained in the fresh batch assembly, Batch 9, is a reconstitutible design with 12 special advanced cladding rods. The ACP fuel rod design is identical to the standard MK-B design. Six zirconium lined tubes and six beta quenched tubes will be used for 12 test rods. These tube modifications are expected to provide improved resistance to water-side corrosion and/or pellet-cladding interaction. The ACP assembly is designed to be reconstitutible to allow future removal of selected rods for examination. The assembly reconstitutible features are designed so that reactor safety and performance are not adversely affected.

There are no significant changes to the acceptance criteria for the Technical Specifications.

The analytical methods used to demonstrate conformance with the Technical Specifications and regulations have only one significant change. The change is that Duke, instead of B&W, has performed the generic mechanical analyses, which envelope the Cycle 7 design. All methods are consistent with the approved methodologies of the Oconee Nuclear Station Reload Design Methodology Technical Report (NFS-1001, Rev. 4, DPC, April 1979), except where specifically noted in the reload report. To support Cycle 7 operation of Oconee Unit 2, the Reload Report employs analytical techniques (methods), and design bases established in reports that were previously submitted and accepted by the USNRC and its predecessor. They are listed in the Reload Report references.

The following evaluation demonstrates by reference to previously performed analysis, that when measured against the three significant safety hazards consideration standards in 10 CFR 50.92, the circumstances of this reload amendment would not involve nor create the conditions described.

First Standard

Involve a significant increase in the probability or consequences of an accident previously evaluated.

Each accident analysis addressed in the Oconee Final Safety Analysis Report (FSAR) has been examined with respect to changes in Cycle 6 parameters to determine the effect of the Cycle 7 reload and to ensure that thermal performance during hypothetical transients is not degraded. The transient evaluation of Cycle 7 is considered to be bound by previously accepted analyses. Section 7 of the Reload Report addresses "Accident and Transient Analysis" for this core reload. This analysis ensures that the proposed reload will not involve a significant increase in the probability or consequences of an accident previously evaluated.

Second Standard

Create the possibility of a new or different kind of accident from any accident previously evaluated.

The analyses performed in support of this reload are in accordance with the USNRC document "Guidance for Proposed License Amendments Relating to Refueling", June 1975. The analysis found that the proposed reload does not in any way create the possibility of a new or different kind of accident from any accident previously evaluated.

Third Standard

Involve a significant reduction in a margin of safety.

The issue of margin of safety for a reload modification involves the following areas:

1. Fuel System Design considerations
2. Nuclear Design considerations
3. Thermal-Hydraulic Design considerations

Sections 4, 5, and 6 of the Oconee 2, Cycle 7 Reload Report address the above areas, respectively. The value limits and margins discussed in these areas are well within the allowable limits and requirements, and reflect no significant reductions to any margins of safety. One can conclude from the examination of these sections, and the Cycle 7 core thermal and kinetic properties (with respect to previous cycle values), that this core reload will not significantly reduce the ability of the Oconee 2 unit to operate safely during Cycle 7.

In summary, Duke has determined and submits that the proposed reload described herein does not involve a significant safety hazard.

Attachment 3

Oconee Unit 2, Cycle 7

Reload Report