

Attachment 1
Duke Power Company
Oconee Nuclear Station

Proposed Technical Specification Revision

page

3.3-3

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- b. The BWST shall contain a minimum level of 46 feet of water having a minimum concentration of 1835 ppm boron at a minimum temperature of 50°F. The manual valve, LP-28, on the discharge line shall be locked open. If these requirements are not met, the BWST shall be considered unavailable and action initiated in accordance with Specification 3.2.

3.3.5 Reactor Building Cooling (RBC) System

- a. Prior to initiating maintenance on any component of the RBC system, the redundant component shall be tested to assure operability.
- b. When the RCS, with fuel in the core, is in a condition with pressure equal to or greater than 350 psig or temperature equal to or greater than 250°F and subcritical:
 - (1) Two independent RBC trains, each comprised of an RBC fan, associated cooling unit, and associated ESF valves shall be operable.
 - (2) Tests or maintenance shall be allowed on any component of the RBC system provided one train of the RBC and one train of the RBS are operable. If the RBC system is not restored to meet the requirements of Specification 3.3.5.b(1) above within 24 hours, the reactor shall be placed in a condition with RCS pressure below 350 psig and RCS temperature below 250°F within an additional 24 hours.
- c. When the reactor is critical:
 - (1) In addition to the requirements of Specifications 3.3.5.b(1) above, the remaining RBC fan, associated cooling unit, and associated ESF valves shall be operable.
 - (2) Tests or maintenance shall be allowed on one RBC train under either of the following conditions:
 - (a) One RBC train may be out of service for 24 hours.
 - (b) One RBC train may be out of service for 7 days provided both RBC trains are operable.*
 - (c) If the inoperable RBC train is not restored to meet the requirements of Specification 3.3.5.c(1) within the time permitted by Specification 3.3.5.c(2) (a) or (b), the reactor shall be placed in a hot shutdown condition within 12 hours. If the requirements of Specification 3.3.5.c(1) are not met within an additional 24 hours following hot shutdown, the reactor shall be placed in a condition with RCS pressure below 350 psig and RCS temperature below 250°F within an additional 24 hours.

*For the "3A" RBC train, a one-time extension of inoperability is granted in order to allow for repair, provided both RBS trains are operable and that the "3A" RBC train is returned to service no later than 11:59 p.m., April 20, 1985.

Attachment 2
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Technical Justification

Technical Justification

The Reactor Building Cooling System is required to minimize the Reactor Building peak pressure after a large break loss of coolant accident (LOCA) and to provide long term containment cooling following a design basis accident. Analyses have demonstrated that even with no Reactor Building spray and no Reactor Building coolers available, the peak pressure following the worst case LOCA will be less than the containment design pressure of 59 psig (Oconee FSAR 15.14.5). The design long term cooling capacity of 240×10^6 Btu/hr can be provided by any one of the following combinations of Reactor Building Cooling System equipment: 1) both Reactor Building spray trains, 2) one Reactor Building spray train and two Reactor Building cooling units, 3) all three Reactor Building Cooling units (FSAR 6.2.2).

Since both Reactor Building spray trains and two Reactor Building coolers are available, more than the design building cooling capacity is available even with the 3A cooling unit out of service. With both Reactor Building spray trains available the consequences of a worst case LOCA will not exceed the design basis analysis. Therefore, an additional seven days inoperability for the 3A cooling unit does not pose an unacceptable degradation in the Reactor Building post-accident safety function.

Attachment 3
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No Significant Hazards Consideration Evaluation

No Significant Hazards Consideration Evaluation

Pursuant to 10 CFR 50 §50.91, Duke Power Company (Duke) has performed an analysis using the standards promulgated in §50.92 and has made the determination that this amendment request involves a no significant hazards consideration. 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.

The proposed Amendment request would allow Unit 3 to operate at full power for an additional seven days beyond the seven days allowed per specification 3.3.4.C.(2)(b), with the "A" Reactor Building Cooling (RBC) train inoperable, provided that two Reactor Building Spray (RBS) trains are operable and that the "3" RBC train is returned to service by 11:59 P.M. on April 20, 1985. The additional 7 days is required so that the "3A" RBC Fan motor can be replaced while the unit is at power.

The Commission has provided guidance concerning the application of these standards by providing certain examples (48 FR 14870). Example (vi) of the types of amendments considered not likely to involve significant hazards consideration is applicable to this amendment request. This specific example states:

"(vi) A change which either may result in some increase to the probability or consequences of a previously-analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan: for example, a change resulting from the application of a small refinement of a previously used calculational model or design method."

As discussed in the Technical Justification (Attachment 2), this amendment change may reduce in some way a safety margin; however the results of the change is clearly within all acceptable criteria with respect to containment heat removal. In that, even with the "3A" RBC train out of service, the Unit 3 RBC system can provide more than the design building cooling capacity.

Duke has determined, based on the preceeding discussion and the Technical Justification (Attachment 2) discussion, that the revision does not involve a significant increase in the probability or consequences of accidents previously considered, nor create the possibility of a new or different kind of accident and will not involve a significant decrease in safety margin. Therefore, Duke concludes that there is no significant hazards consideration involved in this amendment request.