

Duke Power Company  
Oconee Nuclear Station

Attachment 1

Proposed Technical Specification Revision

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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 3.3.5b(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 Specification 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 RBS 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 150°F within an additional 24 hours.

6.0 ADMINISTRATIVE CONTROLS

6.1 ORGANIZATION, REVIEW, AND AUDIT

6.1.1 Organization

6.1.1.1 The Station Manager shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.1.2 In all matters pertaining to actual operation and maintenance and to these Technical Specifications, the Station Manager shall report to and be directly responsible to the Vice President, Nuclear Production, department, through the General Manager, Nuclear Stations. The organization is shown in Figure 6.1-2.

6.1.1.3 The station organization for Operations, Technical Services, Maintenance, Station Services, and Integrated Scheduling shall be functionally as shown in Figure 6.1-1. Minimum operating shift requirements are specified in Table 6.1-1.

6.1.1.4 Incorporated in the staff of the station shall be personnel meeting the minimum requirements encompassing the training and experience described in Section 4 of ANSI/ANS-3.1-1978, "Selection and Training of Nuclear Power Plant Personnel" except for the Station Health Physicist, the Superintendent of Operations and the Operating Engineer.

The Station Health Physicist shall have a bachelor's degree in a science or engineering subject or the equivalent in experience, including some formal training in radiation protection, and shall have at least five years of professional experience in applied radiation protection of which three years shall be in applied radiation protection work in one of Duke Power Company's nuclear stations.

A qualified individual who does not meet the above requirements, but who has demonstrated the required radiation protection management capabilities and professional experience in applied radiation protection work at one of Duke Power Company's multi-unit nuclear stations, may be appointed to the position of Station Health Physicist by the Station Manager, based on the recommendations of the System Health Physicist and as approved by the General Manager, Nuclear Stations.

The Superintendent of Operations shall have a minimum of eight years of responsible nuclear or fossil station experience, of which a minimum of three years shall be nuclear station experience. A maximum of two years of the remaining five years of experience may be fulfilled by academic training, or related technical training, on a one-for-one time basis. The Superintendent of Operations shall hold or have held a Senior Reactor Operator license.

The Operating Engineer shall have a minimum of eight years of responsible nuclear or fossil station experience, of which a minimum of three years shall be nuclear station experience. A maximum of two years of the remaining five years of experience may be fulfilled by academic training, or related technical training on a one-for-one time basis. The Operating Engineer shall hold a Senior Reactor Operator license.

- 6.1.1.5 Retraining and replacement of station personnel shall be in accordance with Section 5.5 of the ANSI/ANS-3.1-1978, "Selection and Training of Nuclear Power Plant Personnel."
- 6.1.1.6 A training program for the fire brigade shall meet or exceed the requirements of Section 27 of the NFPA Code-1975, except that training sessions may be held quarterly.
- 6.1.1.7 The two functions of the Shift Technical Advisor, namely accident assessment and operating experience assessment, are fulfilled in the following manner:
  - a. An experienced SRO, who has been instructed in additional academic subjects, will be assigned on-shift to provide the accident assessment capability.
  - b. The operating experience assessment function will be provided by the Station Safety Review Group.

## 6.1.2 Technical Review and Control

### 6.1.2.1 Activities

- a. Procedures required by Technical Specification 6.4 and other procedures which affect station nuclear safety, and changes (other than editorial or typographical changes) thereto, shall be prepared by a qualified individual/organization. Each such procedure, or procedure change, shall be reviewed by an individual/group other than the individual/group which prepared the procedure, or procedure change, but who may be from the same organization as the individual/group which prepared the procedure, or procedure change. Such procedures and procedure changes may be approved for temporary use by two members of the station staff, at least one of whom holds a Senior Reactor Operator's License on the unit(s) affected. Procedures and procedure changes shall be approved prior to use or within seven days of receiving temporary approval for use by the Station Manager; or by the Operating Superintendent, the Technical Services Superintendent, the Superintendent of Integrated Scheduling, the Station Services Superintendent, or the Maintenance Superintendent, as previously designated by the Station Manager.
- b. Proposed changes to the Technical Specifications shall be prepared by a qualified individual/organization. The preparation of each proposed Technical Specifications change shall be reviewed by an individual/group other than the individual/group which prepared the proposed change, but who may be from the same organization as the individual/group which prepared the proposed change. Proposed changes to the Technical Specifications shall be approved by the Station Manager.
- c. Proposed modifications to station nuclear safety-related structures, systems and components shall be designed by a qualified individual/organization. Each such modification shall be reviewed by an individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modification. Proposed modifications to station nuclear safety-related structures, systems and components shall be approved prior to implementation by the Station Manager; or by the Operating Superintendent, the Technical Services Superintendent, the Superintendent of Integrated Scheduling, the Station Services Superintendent, or the Maintenance Superintendent, as previously designated by the Station Manager.
- d. Individuals responsible for reviews performed in accordance with 6.1.2.1.a, 6.1.2.1.b, and 6.1.2.1.c shall be members of the station supervisory staff, previously designated by the Station Manager to perform such reviews. Each such review shall include a determination of whether or not additional, cross-disciplinary, review is necessary. If deemed necessary, such review shall be performed by the appropriate designated station review personnel.
- e. Proposed tests and experiments which affect station nuclear safety and are not addressed in the FSAR or Technical Specifications shall be reviewed by the Station Manager; or by the Operating Superintendent, the Technical Services Superintendent, the Maintenance Superintendent, the Superintendent of Integrated Scheduling, or the Station Services Superintendent as previously designated by the Station Manager.

- f. Incidents reportable pursuant to Technical Specification 6.6.2.1 and violations of Technical Specifications shall be investigated and a report prepared which evaluates the occurrence and which provides recommendations to prevent recurrence. Such reports shall be approved by the station Manager and transmitted to the Vice President, Nuclear Production Department, or his designee; and to the Director of the Nuclear Safety Review Board.
- g. The station Manager shall assure the performance of special reviews and investigations, and the preparation and submittal of reports thereon, as requested by the Vice President, Nuclear Production Department.
- h. The station security program, and implementing procedures, shall be reviewed at least once per 12 months. Changes determined to be necessary as a result of such review shall be approved by the Station Manager or Station Services Superintendent and transmitted to the Vice President, Nuclear Production Department, or his designee; and to the Director of the Nuclear Safety Review Board.
- i. The station emergency plan, and implementing procedures, shall be reviewed at least once per 12 months. Changes determined to be necessary as a result of such review shall be approved by the Station Manager and transmitted to the Vice President, Nuclear Production Department, or his designee; and the Director of the Nuclear Safety Review Board.
- j. The station manager shall assure that an independent fire protection and loss prevention inspection and audit shall be performed annually utilizing qualified off-site personnel and that an inspection and audit by a qualified fire consultant shall be performed at intervals no greater than three years.
- k. Unplanned onsite releases of radioactive material to the environs shall be investigated and a report prepared which evaluates the occurrence and which provides recommendations to prevent recurrence. Such reports shall be approved by the Station Manager and transmitted to the Vice President, Nuclear Production Department, or designee, and to the Director of the Nuclear Safety Review Board.
- l. Proposed changes to the Offsite Dose Calculation Manual (ODCM) shall be prepared by a qualified individual/organization. Each proposed change shall be reviewed by an individual/group other than the individual group which prepared the proposed change, but who may be from the same organization as the individual/group which prepared the proposed change. Proposed changes to the ODCM shall be approved by the Station Manager prior to implementation.

#### 6.1.2.2 Records

Records of the above activities shall be maintained.

6.2 ACTION TO BE TAKEN IN THE EVENT OF A REPORTABLE OCCURRENCE

- 6.2.1 The Station Manager shall assure that any reportable event is promptly investigated.
- 6.2.2 The Vice President, Nuclear Production Department shall be notified of any Reportable Event. Each Reportable Event report shall be reviewed by the Station Manager; or by: (1) the Operating Superintendent, (2) the Technical Services Superintendent, (3) the Maintenance Superintendent, (4) the Superintendent of Integrated Scheduling, or (5) the Station Services Superintendent, as previously designated by the Station Manager, and the results of the review shall be submitted to the NSRB and the Vice President, Nuclear Production.
- 6.2.3 The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.6.2 and 10 CFR 50.73.

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Attachment 2

No Significant Hazards Consideration Evaluation



## No Significant Hazards Consideration Evaluation

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 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.

The Commission has provided guidance concerning the application of these standards by providing certain examples (48 FR 14870). Example (i) of the types of amendments considered not likely to involve significant hazards considerations is applicable to this amendemnt request. This specific example involves amendment requests that are considered to be purely administrative changes to the Technical Specifications--for example,

- (a) a change to achieve consistency throughout the technical specification; or
- (b) correction of an error; or
- (c) a change in nomenclature.

The proposed Technical Specifications amendments addressed in this submittal has been determined by Duke to contain administrative changes only. The requested changes are required so that the Technical Specifications will be consistent throughout, consistent with the Technical Specifications for McGuire and Catawba Nuclear Stations and consistent with the Administrative Policy Manual for Nuclear Stations.

Duke has determined, based on the above consideration that the requested amendments are administrative in nature, that the revisions do 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 a safety margin. Therefore, Duke concludes that there is a No Significant Hazards Consideration involved in this amendment request.

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Attachment 3

Technical Justification

## Technical Justification

The proposed Technical Specification revisions addressed in this submittal are administrative in nature and, as such, are of no public health or safety significance. Briefly, the proposed amendment corrects a typographical error, deletes an expired footnote and updates the station organization. These changes will provide for clarity and consistency throughout the Oconee Technical Specifications, other Duke Power Company Technical Specifications, and the Administrative Policy Manual for Nuclear Stations.

A footnote is being deleted from section 3.3.5.c (1)(b). The footnote was no longer valid after April 20, 1985 and therefore its deletion will be of no significance. There is also a typographical error in this section that is being corrected.

Technical Specifications 6.1.2.1 (h) and (i) require annual review of the station security program, the station emergency plans and their implementing procedures. The wording is being changed to read "once per 12 months" instead of "annually." The reasoning being to provide consistency throughout the Technical Specification and with other manuals.

Technical Specification 6.1.2.1 (h) also required that the Station Manager approve all procedure changes in the security program implementing procedures. This Specification is being changed to allow the Station Services Superintendent to also approve changes. The Station Services Superintendent is very qualified in this area and the security personnel report to him. For this reason he is qualified to approve procedure changes. In addition, all other superintendents at the station approve procedure changes in areas of their expertise, therefore, to provide consistency, the Station Services Superintendent should approve procedure changes relating to the security program.

The inclusion of the Superintendent of Integrated Scheduling and the Station Services Superintendent in Specifications 6.1.1.3 and 6.1.2.1 (a), (c), and (e), and 6.2.2 is an administrative matter and involves no safety questions. The proposed changes would allow the Station Services Superintendent and the Superintendent of Integrated Scheduling to review and/or approve procedures specified under Specification 6.4 and changes thereto (6.1.2.1a), modifications of safety-related structures, systems or components (6.1.2.1c), proposed tests and experiments which affect nuclear safety and are not addressed in the FSAR or Technical Specifications (6.1.2.1e), and Reportable Events (6.2.2), if so designated by the Station Manager.

Also, in section 6.2.1 the wording is being changed to better reflect the Station Manager's role in the occurrence of a reportable event. The Station Manager does not investigate a reportable event himself, but instead sees that the event is investigated by the appropriate personnel.

Section 6.2.2 is being revised to include the Superintendent of Integrated Scheduling and Station Services Superintendent and also to make this section consistent with the Technical Specifications for McGuire and Catawba Nuclear Stations.

Finally, Section 6.2.3 is being revised for completeness. Reportable events are reported pursuant to specification 6.6.2 and 10 CFR 50.73.

Please note that due to revisions made on page 6.1-1, part of section 6.1.1.4 had to be relocated to page 6.1-1a. The actual context has not changed; only its relative location within Ocone's Technical Specifications has changed.