

DUKE POWER COMPANY
OCONEE NUCLEAR STATION
ATTACHMENT 1
PROPOSED TECHNICAL SPECIFICATIONS

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TABLE 4.4-1
LIST OF PENETRATIONS WITH 10CFR50,
APPENDIX J TEST REQUIREMENTS

PENETRATION NUMBER	SYSTEM	TYPE A TEST SYSTEM CONDITION	LOCAL LEAK TEST	REMARKS
22	LPSW from RC Pump motors and lube oil coolers outlet	Not Vented	Type C	Note 7b, 9
23	RC Pump seal injection	Not Vented	Type C	Note 5, 7d, 9
24	RB H ₂ Analyzer Train A	Note 1	Type C	Note 7c
25	OTSG B Feedwater line	Not Vented	None required	Note 5
26	OTSG A Main steam line	Not Vented	None required	Note 5, MS Stop valve leak test performed
27	OTSG A Feedwater line	Not Vented	None required	Note 5
28	OTSG B Main steam line	Not Vented	None required	Note 5, MS Stop valve leak test performed
29	Quench tank drain line	Note 1	Type C	Note 3, 7b, 9
30 31 32	LPSW for RB Cooling units inlet line	Not Vented	None required	Note 5
33 34 35	LPSW for RB cooling units outlet line	Not Vented	None required	Note 5

DUKE POWER COMPANY

OCONEE NUCLEAR STATION

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 10CFR50.92. 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 guidelines pertaining to the application of the three standards by listing specific examples in 48FR14870. Example (ii) relates to a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications: for example a more stringent surveillance requirement.

In this case, the change proposed by this request is similar to Example (ii) in that the revised leakage testing requirements for Penetration 22 are more stringent than the present requirements.

The following evaluation measures aspects of this proposal against the Part 50.92(c) requirements to demonstrate that all three standards are satisfied.

First Standard

(Amendment would not) 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 the proposed requirement for Type C testing of Penetration 22. The probability of any Design Basis Accident (DBA) is not affected by this change, nor are the consequences of a DBA affected by this change. This change will assure that Penetration 22 will meet the leak rate criteria of Appendix J. In this way during an Engineered Safeguards actuation, containment isolation will be slightly enhanced. Consequently, the change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

Second Standard

(Amendment would not) create the possibility of a new or different kind of accident from any kind of accident previously evaluated.

It has been determined that a new or different kind of accident will not be possible due to this change. This change constitutes a more stringent requirement by requiring Type C leakage rate testing of Penetration 22 when no testing was required previously. This testing ensures that Penetration 22 will meet the leakage rate criteria of Appendix J and thereby providing

addition assurance of the integrity of the penetration in the event of an Engineered Safeguards actuation of valve LPSW-15. As such, this change does not create the possibility of a new or different kind of accident from any kind of accident previously evaluated.

Third Standard

(Amendment would not) involve a significant reduction in a margin of safety.

This change constitutes a more stringent requirement by requiring Type C leakage rate testing of Penetration 22. This ensures that Penetration 22 will meet the leakage rate criteria of Appendix J during an Engineered Safeguards actuation of valve LPSW-15. As such, the margin of safety offered by Penetration 22 in precluding leakage of containment atmosphere is enhanced. Therefore, there will not be a reduction in a margin of safety.

Duke has concluded based on the above, and the supporting Technical Justification, that there is a no Significant Hazards Consideration involved in this amendment request.

DUKE POWER COMPANY
OCONEE NUCLEAR STATION
ATTACHMENT 3
TECHNICAL JUSTIFICATION

TECHNICAL JUSTIFICATION

The existing Oconee Nuclear Station Technical Specification Table 4.4-1 does not require a local leak test for Penetration 22, Low Pressure Service Water (LPSW) from Reactor Coolant (RC) Pump motors and lube oil coolers outlet. The lack of requirements was based on the belief that the pressure in this line outside valve LPSW-15 would be greater than 60 psig following Engineered Safeguards (ES) closure of this valve, due to LPSW being in service. Subsequently, the pressure outside LPSW-15 was checked and found to be 12 psig or less with LPSW-15 closed. This data invalidated the basis for not requiring a local leak test for Penetration 22.

Duke has made the determination that a Type C local leakage rate test should be performed on valve LPSW-15 to meet Appendix J requirements.