DUKE POWER COMPANY

OCONEE NUCLEAR STATION

ATTACHMENT 1

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3.15 Control Room Pressurization and Filtering System and Penetration Room Ventilation System

Applicability

Applies to the Unit 1 and 2, and Unit 3 control room pressurization and filtering systems and the penetration room ventilation system.

Objective

To define the conditions necessary to assure operability of the control room pressurization and filtering system and the immediate availability of the penetration room ventilation systems.

Specification

3.15.1 Penetration Room Ventilation Systems

a. Two trains of the penetration room ventilation systems shall be operable at all times when containment integrity is required or the reactor shall be shutdown within 12 hours with the following exception:

(1) If one of two trains of a penetration room ventilation system is made or found to be inoperable for any reason, reactor operation is permissible only during the succeeding seven days provided that all active components of the other train of the penetration room ventilation system shall be demonstrated to be operable within 24 hours and daily thereafter.

3.15.2 Control Room Pressurization and Filtering Systems

a. With the reactor above hot shutdown conditions both outside air booster fans shall be operable.

(1) If one outside air booster fan is inoperable, restore the inoperable fan to operable status within 48 hours, or a report shall be submitted to the NRC within the next 30 days.

(2) If both outside air booster fans are inoperable, a report shall be submitted to the NRC within the next 30 days.

b. With the reactor above hot shutdown conditions, one control room air handling unit fan shall be operable.

(1) If both control room air handling unit fans are inoperable, restore at least one inoperable fan to operable status or verify that the system is able to maintain a positive pressure within 7 days.

(2) If the above requirements of Specification 3.15.2.b.(1) are not met, a report shall be submitted to the NRC within the next 30 days.

c. With the reactor above hot shutdown conditions and both outside air booster fans operable, the control room pressurization and filtering systems shall be capable of maintaining a positive pressure within the control room.

(1) If the above requirements of Specification 3.15.2.c are not met within 7 days, a report shall be submitted to the NRC within the next 30 days.

d. With the reactor above hot shutdown conditions, both filter trains shall be operable.

(1) If one filter train is inoperable, restore the inoperable filter train to operable status within 48 hours, or a report shall be submitted to the NRC within the next 30 days.

(2) If both filter trains are inoperable, a report shall be submitted to the NRC within the next 30 days.

e. The provisions of Specification 3.0 do not apply.

Bases

A single train of reactor building penetration room ventilation equipment retains full capacity to control and minimize the release of radioactive materials from the reactor building to the environment in post-accident conditions.

The control room pressurization and filtering system is comprised of two separate outside air booster fans with prefilter/HEPA/carbon filter trains, two redundant control room air handling unit fans, and associated ductwork. The system is designed to protect the control room operators from the effects of accidental release of radioactive effluents or toxic gases in the Turbine or Auxiliary Building.

Protection is provided by pressurizing the control room with filtered outside air to prevent inleakage of radioactive effluents or toxic gases from the Turbine or Auxiliary Building only. Specification 3.15.2.c applies to all instances where the reactor is above hot shutdown and the system is judged incapable of maintaining the control room at a positive pressure or, if during refueling frequency testing per Specification 4.12.1.b the system is demonstrated to be incapable of maintaining the control room at a positive pressure.

The reports to the NRC required by Specification 3.15.2 shall outline the cause of the inoperability and the plans and schedule for restoring the inoperable component to operable status.

4.12 CONTROL ROOM PRESSURIZATION AND FILTERING SYSTEM

Applicability

Applies to control room pressurization and filtering system components

Objective

To verify that these systems and components will be able to perform their design functions.

Specification

4.12.1 Operating Tests

a. Control room outside air booster fan system tests shall be performed quarterly. These tests shall consist of an external visual inspection, a flow measurement for each unit and pressure drop measurements across each filter bank. Pressure drop across pre-filter shall not exceed 1 inch H_2O and pressure drop across HEPA shall not exceed 2 inches H_2O. Fan motors shall be operated continuously for at least one hour, and all louvers shall be proven operable.

b. On a refueling frequency, verify the system maintains the control room at a positive pressure with both outside air booster fans on during system operation.

4.12.2 Filter Tests

On a refueling frequency, for the Unit 1 and 2 and the Unit 3 control room an in-place leakage test using DOP on HEPA units and Freon-112 (or equivalent) on carbon units shall be performed at design flow on each filter train. Removal of 99.5 percent DOP by each entire HEPA filter unit and removal of 99.0 percent Freon-112 (or equivalent) by each entire carbon adsorber unit shall constitute acceptance performance. These tests must also be performed after any maintenance which may affect the structural integrity of either the filtration system units or of the housing.

Bases

The purpose of the control room pressurization filtering system is to protect the control room operators from the effects of accidental release of radioactive effluents or toxic gases in the Turbine Building or Auxiliary Building only. The system is designed with two 50 percent capacity filter trains each of which consists of a prefilter, high efficiency particulate filters, carbon filters, booster fans, air handling unit fans, and associated ductwork to pressurize the control room with outside air.

Since these systems are not normally operated, a periodic test is required to insure their operability when needed. Quarterly testing of this system will show that the system is available for its safety function.

Refueling frequency testing of the installed carbon adsorber stage and absolute filters will verify the leak integrity of the cleanup system. Refueling frequency testing will also verify the ability of the system to maintain the control room at a positive pressure to minimize infiltration of hazardous effluents.

DUKE POWER COMPANY

OCONEE NUCLEAR STATION

ATTACHMENT 2

TECHNICAL JUSTIFICATION

Technical Justification

The design of Oconee Nuclear Station pre-dates General Design Criterion 19 (GDC-19) of Appendix A to 10CFR 50. However, control room habitability was a design consideration at Oconee. The ventilation system was originally designed and installed in accordance with HVAC Industry Standards and practice for commercial and industrial systems.

The control rooms are located in the Auxiliary Building. Oconee 1 and 2 have a shared control room while Oconee 3 has a separate control room. The Control Room Area Ventilation and Air Conditioning Systems are designed to maintain the environment in the Control Room, Control Room Zone, Cable Room, and Electrical Equipment Rooms within acceptable limits for the operation of unit controls as necessary for equipment and operating personnel. The Control Room Area Ventilation and Air Conditioning System consists of HVAC units which are separated and isolated from the HVAC systems of other adjacent areas. Each control room is primarily served by two large air handling units (AHU). The AHUs are 100 percent capacity and only one AHU is required to operate at a time. An AHU consists of a roughing filter, chilled water coils, and a centrifugal fan.

The control room pressurization and filtering system is comprised of two separate outside air booster fans with prefilter/HEPA/carbon filter trains, two redundant control room air handling unit fans, associated ductwork, and radiation monitor RIA-39. As opposed to the Control Room Area Ventilation and Air Conditioning System, the control room pressurization and filtering system is not normally operated and would only be activated by manual operator action in the event of a radioactive or toxic gas release in the Turbine Building or Auxiliary Building only. For a source outside the Turbine Building or Auxiliary Building, the possibility exists that operation of the control room pressurization and filtering system versus maintaining the control room in its normally isolated mode may actually serve to increase operator exposure to the hazards. Thus, each release will need to be evaluated on an individual basis to determine whether operation of the system will increase operator exposure. Appropriate action would then be taken to help maintain operator dose As Low As Reasonably Achievable (ALARA).

The control room pressurization and filtering system has been upgraded to meet the intent of NUREG-0737 Item III.D.3.4 (Control Room Habitability) by providing additional protection for the control room operators from the effects of accidental release of radioactive effluents and toxic gases in the Turbine Building and Auxiliary Building only. These upgrades will serve to help maintain operator doses ALARA. The main objective of the system modifications has been to pressurize the control rooms to a slightly positive differential pressure as compared to areas surrounding the control room envelope. The leakage criterion of a "measurable positive pressure" was identified by the NRC as an acceptable deviation from Regulatory Guide (RG) 1.95 criteria within a Safety Evaluation on Control Room Habitability at Oconee dated November 24, 1986. Specific modifications involved separation and isolation of control room HVAC from equipment and cable room HVAC, upgrades of control room AHU fan isolation dampers to provide low leakage dampers for minimization of recirculation losses, sealing of control room supply and return ductwork, and installation of new air handling units such that the cable rooms can be cooled independently from the control rooms. In addition, by letter dated August 14,

1987 Duke proposed the relocation ofcontrol room outside air intakes. Relocation of the intakes should resolve current NRC concerns regarding calculation of operator doses in accordance with NRC guidance including atmospheric dilution factors and occupancy factors. Modifications for relocation of the intakes are contingent upon NRC concurrence. Duke is currently awaiting NRC concurrence.

Upon activation of the control room pressurization and filtering system by manual operator action, the outside air booster fans force air from the prefilter/HEPA/carbon filter trains and the control room outside air intakes (located on the Auxiliary Building roof) into the control room to provide a slightly positive differential pressure as compared to areas surrounding the control room. Due to system configuration, the control room air handling unit fans may assist the outside air booster fans in pressurizing the control room. A continuous sample of control room air is pumped through a detector (RIA-39) in order to monitor the radioactivity that may be present. High radiation and loss of sample flow are annunciated in the control room.

Theoretically, in-plant releases of chemical vapors or radioactive effluents call for use of the control room pressurization and filtering system to prevent in-leakage. However, no Design Basis Accident (DBA) is identified that could result in concentrations above NRC criteria, i.e., chlorine, hydrazine, gas decay tanks, etc. The commitment to pressurize following a Loss of Coolant Accident (LOCA) is based on potential iodine sources from containment leakage into the penetration room and into the control room bypassing filtration. However, consideration of thyroid doses from iodine has been deferred until resolution of the current source term reevaluation study by NRC Safety Evaluation dated November 24, 1986. Upon completion of the NRC reevaluation, Duke will review the results to determine appropriate actions, if any, to be taken. With the deferral of thyroid doses from iodine the effect of infiltration on the overall noble gas whole body dose in the control room will be negligible. Thus, in the calculation of post-LOCA operator doses, the concentration of radionuclides in the control room is assumed to be the same as the concentration in the supply intake. In summary, control room pressurization, filter train operability, supply air flow rate, and infiltration rates have no impact on the dose analysis.

Although use of NRC accepted methodology in the calculation of control room operator doses (with the deferral of the iodine issue) does not result in doses exceeding NRC criteria, conservatisms within this methodology can be identified:

- o The assumption that the concentration of radionuclides in the control room is the same as the supply intake neglects the credit for the buildup to this concentration at the initiation of the release;

- o The initiation of the release is assumed to occur at the start of the Maximum Hypothetical Accident (MHA). This assumption contributes significantly to the dose analysis in that 70% of the whole body dose is due to isotopes with half-lives less than 2.8 hours. From the BMI-2104 source term report and similar studies, the post-LOCA activity release rate would allow for significant decay of short lived isotopes;

- o The calculation of atmospheric dilution factors assumes all releases are from the containment surface and no credit is given for greater dilution of source from the unit vent.

In addition, although no DBA is identified that could result in chemical vapor or radioactive effluent concentrations above NRC criteria and consequently no DBA would result in a loss of a control room; operators at Oconee are provided with procedures which direct them to the Auxiliary Shutdown Panel and/or the Standby Shutdown Facility. Thus the units can be maintained at hot shutdown from locations other than the control room. Due to the diverse locations for unit control, it is highly unlikely that all locations could be rendered uninhabitable by the same initiating event. Loss of control room situations would also result in initiation of the Emergency Plan.

Changes to Technical Specifications proposed within this amendment request include: administrative changes to the Table of Contents, Limiting Conditions for Operation (LCO) of the control room pressurization and filtering system and administrative changes to Specification 3.15, and additional testing requirements for the control room pressurization and filtering system and clarifications to Specification 4.12.

Specific proposed changes to the Table of Contents are:

1) The title of Specification 3.15 on page iv has been updated to include the proposed limiting conditions for operation of the control room pressurization and filtering system. This change provides consistency throughout the Technical Specifications and is thus considered to be an administrative change (48FR14870 Example i).

2) The title of Specification 4.12 on page v has been changed to "CONTROL ROOM PRESSURIZATION AND FILTERING SYSTEM." This change provides a title which more accurately reflects the function of the subject system and is thus considered to be an administrative change (48FR14870 Example i).

Proposed changes to Specification 3.15 provide LCO's for the control room pressurization and filtering system and reporting requirements wherein the LCO is not satisfied. LCO's are provided for individual components as well as for the ability of the system to meet the "measurable positive pressure" criterion. Specific changes to Specification 3.15 are:

1) The title of Specification 3.15 has been updated to include the proposed LCO's for the control room pressurization and filtering system. This update is considered to be an administrative change (48FR14870 Example i).

2) The Applicability and Objective of Specification 3.15 have been updated to include the proposed LCO's for the control room pressurization and filtering system. These updates are considered to be administrative changes per 48FR14870 Example i.

3) Specification 3.15.1 has been added to include the LCO for the Penetration Room Ventilation System. This change merely numbers this part of Specification 3.15 to provide consistency with the proposed LCO's for the control room pressurization and filtering system and is therefore considered to be an administrative change per 48FR14870 Example i.

4) Specification 3.15.2.a provides a 48 hour grace period in the event the reactor is above hot shutdown and an outside air booster fan is inoperable. In the event the inoperable fan cannot be restored to operable status within the 48 hours, a report shall be submitted to the NRC within the next 30 days. In the event the reactor is above hot shutdown and both outside air booster fans are inoperable, a report shall be submitted to the NRC within the next 30 days. This change therefore constitutes an additional restriction not presently included in Technical Specifications (48FR14870 Example ii).

5) Specification 3.15.2.b provides 7 days for restoration to operable status of one control room air handling unit fan in the event both fans are inoperable and the reactor is above hot shutdown. However, if testing within the next 7 days verifies that the system is unable to maintain a positive pressure, a report shall be submitted to the NRC within the next 30 days. If testing verifies that the system is able to maintain a positive pressure with the air handling unit fans inoperable, there is no limiting condition for operation. This LCO is provided due to the system configuration in which the air handling unit fans may assist the outside air booster fans in pressurizing the control room. Thus if testing with the air handling unit fans inoperable demonstrates that the pressurization criteria can be achieved, there is no basis for an LCO. This change therefore constitutes an additional restriction not presently included in Technical Specifications (48FR14870 Example ii).

6) Specification 3.15.2.c provides reporting requirements in the event the reactor is above hot shutdown with both outside air booster fans operable and the system is demonstrated or is judged to be incapable of maintaining a positive pressure within the control room. A grace period of 7 days is provided to restore the ability to pressurize the control room, otherwise a report shall be submitted to the NRC within the next 30 days. This change therefore constitutes an additional restriction not presently included in Technical Specifications (48FR14870 Example ii).

7) Specification 3.15.2.d provides a 48 hour grace period in the event one filter train is inoperable before a 30 day report is submitted to the NRC. In the event both filter trains are inoperable a 30 day report is automatically submitted to the NRC. While the filter trains are not required to pressurize the control rooms, they do ensure that only filtered air enters the control room while the outside air booster fans are energized. This change therefore constitutes an additional restriction not presently included in Technical Specifications (48FR14870 Example ii).

8) Specification 3.15.2.e states that the provisions of Specification 3.0 do not apply. This change is considered to be administrative in nature (48FR14870 Example i).

9) Specification 3.15 Bases provide a description of the components and design of the control room pressurization and filtering system, specifies which situations Specification 3.15.2.c applies, and details the contents of reports to the NRC required by Specification 3.15. This change provides consistency throughout the proposed Technical Specification and is therefore considered to be administrative in nature (48FR14870 Example i).

Duke has determined that inclusion of LCO's to address chlorine detection is unwarranted. There are no chlorine sources that could cause hazardous concentrations or concentrations in excess of NRC criteria in the control room. In addition, the Control Room Ventilation and Air Conditioning System is isolated in the normal mode of operation (100% recirc). In the event the outside air booster fans are in operation, sufficient time is available for operators to manually isolate the outside air booster fans. Further, within the November 24, 1986 Safety Evaluation the NRC determined that "adequate protection for control room operators is provided against potential toxic gas release accidents."

Proposed changes to Specification 4.12 include additional testing of the control room pressurization and filtering system as well as clarifications to existing requirements. Specific changes to Specification 4.12 are:

1) The title of Specification 4.12 has been changed from "CONTROL ROOM FILTERING SYSTEM" to "CONTROL ROOM PRESSURIZATION AND FILTERING SYSTEM". The latter title more accurately reflects the function of the subject system and is therefore considered to be administrative in nature (48FR14870 Example i).

2) The Applicability of Specification 4.12 has been updated to provide consistency with the title change and is therefore considered to be administrative in nature (48FR14870 Example i).

3) Specification 4.12.1.a has been clarified to be the control room outside air booster fan system to prevent confusion with the normal control room air handling units. This change is therefore considered to be administrative in nature (48FR14870 Example i).

4) The visual inspection of Specification 4.12.1.a has been clarified to be an external visual inspection. The intent of the original Specification 4.12.1 was not to perform an internal visual inspection. An internal visual inspection will not provide any more information on system availability than the in-place leakage testing using DOP required in Specification 4.12.2 on a refueling frequency. Since the filter housings are not designed for easy access, structural integrity of the housing could be affected by an internal inspection, requiring DOP testing quarterly. This is consistent with current testing practices at ONS. This clarification is therefore considered to be administrative in nature (48FR14870 Example i).

5) The phrase "and other mechanical systems" has been deleted from Specification 4.12.1.a. There are no other mechanical systems associated with the control room pressurization and filtering system which are not specifically addressed in Specification 4.12. Therefore, this change has been determined to be administrative in nature (48FR14870 Example i).

6) Specification 4.12.1.b has been added to require verification on a refueling frequency of the ability to pressurize the control room. This change constitutes an additional control not presently included in Technical Specifications (48FR14870 Example ii).

7) Nomenclature in Specification 4.12.2 and the bases is corrected to indicate that adsorber units are comprised of "carbon" not necessarily "charcoal". This change is therefore considered to be administrative in nature (48FR14870 Example i).

8) The frequency of filter tests per Specification 4.12.2 has been changed from "during each refueling outage" to "refueling frequency" to prevent redundant tests of the filter system should there be back to back outages of Unit 1 and Unit 2. This change provides consistency with definitions of surveillance intervals and is therefore considered to be administrative in nature (48FR14870 Example i).

9) Bases are corrected to indicate that filter trains are each 50 percent capacity rather than 100 percent. This corrects an earlier typographical error and represents no change to equipment. This change therefore is considered to be administrative in nature (48FR14870 Example i).

10) The Bases have been updated to include a list of system components and the method for protection of control room operators. This change is a result of additional testing requirements in Specification 4.12.1.b and is considered to be administrative in nature (48FR14870 Example i).

11) The bases have been corrected to conform to the external visual inspection requirements of Specification 4.12.1.a by the deletion of "During this test, the system will be inspected for...when the fan motor is running." The system is not exposed to an environment which would introduce water, oil, or foreign material into the system. The only way to ensure integrity of gasket material and adhesive is through refueling frequency DOP testing. Unusual or excessive noise during fan motor operation is checked during the external visual inspection. This change is therefore considered to be administrative in nature (48FR14870 Example i).

DUKE POWER COMPANY

OCONEE NUCLEAR STATION

ATTACHMENT 3

NO SIGNIFICANT HAZARDS CONSIDERATION EVALUATION

NO SIGNIFICANT HAZARDS CONSIDERATOIN EVALUATION

A detailed discussion of specific changes to Technical Specifications proposed in this amendment request is provided in the Technical Justification (Attachment 2). Briefly, this proposal includes:

- o Administrative changes to the Table of Contents;
- o Changes to Specification 3.15 which provide Limiting Conditions for Operation (LCO) of the control room pressurization and filtering system and reporting requirements wherein the LCO is not satisfied. LCO's are provided for individual components as well as the ability of the system to meet the "measurable positive pressure" criterion. Administrative changes to support the LCO's are also provided;
- o Changes to Specification 4.12 which require additional testing of the control room pressurization and filtering system as well as clarifications to existing requirements.

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48FR14870) of amendments that are considered not likely to involve a significant hazards consideration. Example (i) relates to a purely administrative change to Technical Specifications. Example (ii) relates to a change which constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications. The Technical Justification provided in Attachment 2 categorizes the changes proposed in this amendment request in accordance with 48FR14870 guidance. The changes proposed in this amendment request have been determined to be similar to either Example (i) or (ii).

By applying the standards established in NRC regulations in 10CFR 50.92, Duke has made the determination that this amendment request involves a No Significant Hazards Consideration. This ensures that the 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 amendments addressed in this submittal constitute either additional restrictions not presently included in Technical Specifications or changes which are purely administrative in nature.

Each accident analysis addressed in the Oconee Final Safety Analysis Report (FSAR) has been examined with respect to changes proposed in this amendment request. 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, since operability of the control room pressurization and filtering system is not considered to be an initiator or contributor to any accident analysis addressed in the Oconee FSAR. Further, operation of the control room pressurization and filtering system has no impact on the dose analysis. As such, this change will 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.

Changes provided within this amendment request constitute either additional restrictions not presently included in Technical Specifications or changes which are purely administrative in nature. Consequently, this change will not create the possibility of a new or different kind of accident from any kind of accident previously evaluated.

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

These changes constitute either additional restrictions not presently included in Technical Specifications or changes which are purely administrative in nature. Operability of the control room pressurization and filtering system will assure that control room operator doses remain As Low As Reasonably Achievable (ALARA) in the event of a radioactive or toxic gas release in the Turbine Building or Auxiliary Building. However, operation of the control room pressurization and filtering system has no impact on the dose analysis. As such, there will be no significant reduction in any margin of safety.

Duke has concluded based on the above and the Technical Justification in Attachment 2 that there is a No Significant Hazards Consideration involved in this amendment request.