3.5.6 Accident Monitoring Instrumentation

Applicability

Applies to accident monitoring instrumentation.

Objective

To ensure that sufficient information is available on selected plant parameters to monitor and assess such parameters following an accident.

Specifications

3.5.6.1 The accident monitoring instrumentation shown in Table 3.5.6-1 shall be operable per applicability indicated in the Table. The provisions of Technical Specification 3.0 do not apply.

3.5.6.2 In the event that the number of accident monitoring instrumentation channels falls below the limit given in Table 3.5.6-1, return the instrumentation to operable status within 7 days of the event or a report shall be submitted to the Commission within the next 30 days outlining the cause of inoperability and the plans and schedule for restoring the instrumentation to operable status.

a. If the number of operable channels for the Wide Range Water Level Monitor falls below the limit given in Table 3.5.6-1, at least one monitor shall be restored to operable status within thirty days, or the unit shall be in hot shutdown within the next 12 hours.

b.(1) If only one subcooling monitor is operable, at least one other subcooling monitor shall be restored to operable status within 7 days or the unit shall be in hot shutdown within the next 12 hours and below 300°F within the next 7 days.

b.(2) If all subcooling monitors are inoperable, then restore at least one monitor to operable status within 48 hours or be in at least hot shutdown within the next 12 hours and below 300°F within the next 7 days.

c. If the number of operable qualified core exit thermocouple trains falls below the limit given in Table 3.5.6-1, restore at least one train to operable status within 7 days or the unit shall be in hot shutdown within the next 12 hours.

3.5.6.3 If the Noble Gas Effluent Monitor is inoperable per applicability indicated in Table 3.5.6-1, an alternative Noble Gas Monitoring program shall be instituted within 72 hours.

Bases

The operability of the accident monitoring instrumentation for accident conditions as appropriate ensures that sufficient information is available on

selected plant parameters to monitor and assess these variable following an accident.

Alternative methods for monitoring noble gas effluent during inoperability of RIA-56 shall include one or more of the following methods:

- RIA-45 normal range noble gas monitor on unit vent
- RIA-46 high range noble gas monitor on unit vent
- Actual vent sample
- Direct radiation readings on RIA-45 and -46 sample line.

RCS subcooled margin is directly indicated in the control room. Core subcooled margin is indicated on both ICC plasma displays, the OAC video, and a digital control board meter. Loop A subcooled margin is indicated on one ICC plasma display, the OAC video, and a digital control board meter. Loop B subcooled margin is indicated on the other ICC plasma display, the OAC video, and a digital control board meter. The OAC video and the digital control board meters are redundant displays of the same signal.

The operability requirements of the Reactor Coolant System subcooling margin monitors ensures that sufficient information is available to the operators to provide prompt recognition of saturated conditions in the primary coolant system and advanced warning of the approach to inadequate core cooling. Guidance for these requirements was provided by the NRC letter of July 2, 1980, and derived from the implementation of the TMI-2 lessons learned program.

Temperature indications from all 24 qualified core exit thermcouples can be displayed on the OAC. 12 qualified core exit thermcouples per train will input to each train of process electronics and can be displayed on the respective ICC plasma display.

Table 3.5.6-1
ACCIDENT MONITORING INSTRUMENTATION

	Instrument	Minimum Operable Channels	Applicability
1.	Containment Pressure Monitor (PT-230, -231)	1 of 2	(a)
2.	Containment Water Level Monitors		(a)
	a) Wide Range (LT-90, 91)	1 of 2	
	b) Emergency Sump (LT-3P, 112)	1 of 2	
3.	Noble Gas Effluent Monitor (RIA-56)	1 of 1	(a)
4.	Containment High-Range Radiation Monitor (RIA-57, -58)	1 of 2	(a)
5.	Containment Hydrogen Monitor (MT-80, 81)	1 of 2	(a)
6.	Wide Range Hot Leg Level (RC-LT0123, RC-LT0124)	1 of 2	(a)
7.	Reactor Vessel Head Level (RC-LT0125, RC-LT0126)	1 of 2	(a)
8.	Reactor Coolant Pump Current	2 of 4 (b)	(a)
9.	Qualified Core Exit Thermocouples Trains	1 of 2 (c)	(a)
10.	Subcooling Monitors	2 (d)	(e)

(a) Above hot shutdown conditions.

(b) One Current Meter per loop must be operable.

(c) 5 of 12 qualified core exit thermocouples must be operable per train for a train to be considered operable.

(d) Operable subcooling margin monitors must consist of:

1) One direct indication for 1 of 2 RCS hot legs and one direct indication for the core;

OR

2) One direct indication for each RCS hot leg.

(e) When RCS temperature is above 300°F.

Table 4.1-1 (CONTINUED)

Channel Description	Check	Test	Calibrate	Remarks
49. Emergency Feedwater Flow Indicators	MO	NA	RF	
50. PORV and Safety Valve Position Indicators	MO	NA	RF	
51. RPS Anticipatory Reactor Trip System Loss of Turbine Emergency Trip System Pressure Switches	NA	MO	RF	
52. RPS Anticipatory Reactor Trip System Loss of Main Feedwater				
a) Control Oil Pressure Switches	NA	MO	RF	
b) Discharge Pressure Switches	NA	MO	RF	
53. Emergency Feedwater Initiation Circuits				
a) Control Oil Pressure Switches	NA	MO	RF	
b) Discharge Pressure Switches	NA	MO	RF	
54. Containment High Range Radiation Monitor (RIA-57, 58)	NA	MO	RF	TMI Item II.F.1.3

Table 4.1-1 (CONTINUED)

Channel Description	Check	Test	Calibrate	Remarks
55. Containment Pressure Monitor (PT-230, 231)	MO	NA	AN	TMI Item II.F.1.4
56. Containment Water Level Monitors				TMI Item II.F.1.5
a) Wide Range (LT-90, 91)	MO	NA	RF	
b) Emergency Sump (LT-3P, 112)	MO	NA	RF	
57. Containment Hydrogen Monitor (MT-80,-81)	MO	NA	AN	TMI Item II.F.1.6
58. Noble Gas Effluent Monitor (RIA-56)	NA	MO	AN	TMI Item II.F.1.6
59. Wide Range Hot Leg Level	NA	RF	RF	
60. Reactor Vessel Head Level	NA	RF	RF	
61. Reactor Coolant Pump Current	NA	NA	RF	
62. Core Exit Thermocouples	MO	NA	RF	
63. Subcooling Monitors	MO	RF	RF	

ES - Each Shift
DA - Daily
WE - Weekly
MO - Monthly

QU - Quarterly
AN - Annually
PS - Prior to startup, if not performed previous week
NA - Not Applicable
RF - Refueling Outage

Table 4.1-2
MINIMUM EQUIPMENT TEST FREQUENCY

	Item	Test	Frequency
1.	Control Rod Movement (1)	Movement of Each Rod	Monthly
2.	Pressurizer Safety Valves	Setpoint	Each Refueling (4)
3.	Main Steam Safety Valves	Setpoint	Each Refueling (4)
4.	Refueling System Interlocks (5)	Functional	Prior to Refueling
5.	Main Steam Stop Valves (1)	Movement of Each Stop Valve	Monthly
6.	Reactor Coolant System (2) Leakage	Evaluate	Daily
7.	Condenser Cooling Water System Gravity Flow Test	Functional	Each Refueling
8.	High Pressure Service Water Pumps and Power Supplies	Functional	Monthly
9.	Spent Fuel Cooling System	Functional	Prior to Refueling
10.	High Pressure and Low (3) Pressure Injection System	Vent Pump Casings	Monthly and Prior to Testing
11.	Emergency Feedwater Pump Automatic Start and Automatic Valve Actuation Feature	Functional	Each Refueling

(1) Applicable only when the reactor is critical.

(2) Applicable only when the reactor coolant is above 200°F and at a steady-state temperature and pressure.

(3) Operating pumps excluded.

(4) Number of safety valves to be tested each refueling shall be in accordance with ASME Codes Section XI, Article IWV-3511, such that each valve is tested at least once every 5 years.

(5) Applicable only to the interlocks associated with the Reactor Building Purge System.

DUKE POWER COMPANY

OCONEE NUCLEAR STATION

Attachment 2

Technical Justification

Technical Justification

Changes to Technical Specifications proposed within this amendment request are addressed below and include: administrative changes to the Table of Contents, Limiting Conditions for Operation (LCO) of Inadequate Core Cooling (ICC) instrumentation, and surveillance requirements for ICC instrumentation. Changes proposed within Duke's October 8, 1984 amendment request (with the exception of changes to page 6.4-1 which were approved by amendment numbers 146/146/143) as well as the August 27, 1985 and September 19, 1986 supplements are also addressed below to provide completeness, however, the Technical Justification and No Significant Hazards Considerations remain unchanged from the original submittals.

Specific proposed changes are:

1) Table of Contents, page iii. Specification 3.1.12 Reactor Coolant System Subcooling Margin Monitors has been relocated, LCO's for the subcooling monitors are now included within the requirements of proposed Specification 3.5.6.

2) Table of Contents, page iii. Specification 3.5.6 Accident Monitoring Instrumentation has been added to reflect LCO's for accident monitoring instrumentation. This change was originally proposed within the October 8, 1984 amendment request.

3) Table of Contents, page vi. Table 3.5.6-1 Accident Monitoring Instrumentation has been added to the List of Tables to reflect the operability requirements for accident monitoring instrumentation. This change was originally proposed within the October 8, 1984 amendment request.

4) Page 3.1-24. Specification 3.1.12 Reactor Coolant System Subcooling Margin Monitors has been relocated. LCOs for the subcooling monitors are included within Specification 3.5.6.

5) Page 3.5-44. Specification 3.5.6 Accident Monitoring Instrumentation has been added to include LCO's for accident monitoring instrumentation.

   Specifications 3.5.6.1, 3.5.6.2, and 3.5.6.3 were originally proposed within the October 8, 1984 amendment request and September 19, 1986 supplement. Within this amendment request, LCO's for the subcooling monitors have been relocated from Specification 3.1.12 and are included as Specifications 3.5.6.2.b(1) and (2). This is consistent with recommendations in the November 19, 1987 NRC Technical Evaluation Report (TER).

   The number of operable subcooling monitors required in Specification 3.5.6 is identical to the number required in the current Specification 3.1.12 (i.e. one hot leg and the core, or both hot legs). However, the number of available subcooling monitors which provide direct indication in the control room has increased due to installation of the ICC instrumentation system. Core subcooled margin is indicated on both ICC plasma displays, the Operator Aid Computer (OAC) video, and a digital control board meter. Loop A subcooled margin is indicated on one ICC plasma display, the OAC video, and a digital control board meter. Loop B subcooled margin is indicated on the other ICC plasma display, the OAC video, and a digital control board meter. The OAC video and digital control board meters are redundant displays of the same signal.

Specification 3.5.6 Bases on pages 3.5-44 and 3.5-45 included information regarding accident monitoring instrumentation operability and alternative noble gas monitoring methods within the October 8, 1984 amendment request and September 19, 1986 supplement. Within this proposal, information regarding the location and purpose of subcooled margin indications is provided within the Specification 3.5.6 Bases.

Specification 3.5.6.2.c has been added to include LCOs for the qualified core exit thermocouples. Specifically, one train of qualified core exit thermocouples is required to be operable above hot shutdown conditions. There are a total of 24 qualified core exit thermocouples. Five of twelve thermocouples must be operable per train for a train to be considered operable. Information regarding display of qualified thermocouple indications is provided in the bases of Specification 3.5.6.

5) Page 3.5-46, Table 3.5.6-1. Table 3.5.6-1 Accident Monitoring Instrumentation has been added to provide operability requirements for accident monitoring instrumentation. Item numbers 1 through 5 were originally proposed within the October 8, 1984 amendment request and August 27, 1985 supplement. Item numbers 6 through 10 have been included within this proposal to address operability requirements for Wide Range Hot Leg Level (HLLM), Reactor Vessel Head Level (RVHLM), Reactor Coolant Pump Current (RCPM), Qualified Core Exit Thermocouples (CET) Trains, and Subcooling Monitors (SMM) respectively. Footnotes b, c, d, and e have been included to further clarify operability and applicability of the instrumentation.

Item number 2, Containment Water Level Monitors originally included requirements for operability of Normal Sump Level instrumentation when proposed in the October 8, 1984 amendment request and August 27, 1985 supplement. Subsequently, it has been determined that operability requirements for normal sump level instrumentation are unnecessary. This instrumentation is used to monitor RCS leakage during normal operations. Limiting conditions for operation due to RCS leakage are found in Specification 3.1.6. Normal sump level indication would be off scale during accident conditions.

6) Pages 4.1-8 and 4.1-8a, Table 4.1-1. Item numbers 54 through 63 have been added to Table 4.1-1 Instrument Surveillance Requirements. Item numbers 54 through 58 were originally proposed within the October 8, 1984 amendment request. Item numbers 59 through 63 have been included within this proposal to address instrument surveillance requirements for HLLM, RVHLM, RCPM, CET, and SMM.

Item number 55, Containment Water Level Monitors originally included surveillance requirements for Normal Sump Level instrumentation when proposed in the October 8, 1984 amendment request. As discussed, previously, it has been determined that operability requirements for normal sump level instrumentation are unnecessary. Thus it is inappropriate to include surveillance requirements for this instrumentation in Technical Specifications.

Functional testing requirements for the subcooling monitors associated with the OAC have been relocated from Table 4.1-2. Surveillance requirements proposed in Table 4.1-1 Item number 63 include subcooling monitors associated with the OAC and the ICC system.

Procedures for surveillance of ICC instrumentation will be implemented by June 1988.

7) Page 4.1-9, Table 4.1-2. Item number 12 regarding functional testing of subcooling monitors associated with the OAC has been relocated from Table 4.1-2 Minimum Equipment Test Frequency to Table 4.1-1 as Item number 63.

The proposed amendment specifies the LCOs and Surveillance Requirements for the ICC instrumentation. The ICC system for Oconee consists of the following subsystems: Subcooling Margin Monitor (SMM); Core Exit Thermocouples (CET); Wide Range Hot Leg Level Monitor (HLLM); Reactor Vessel Head Level Monitor (RVHLM) and Reactor Coolant Pump Motor Current Monitor (RCPM). Information concerning the design of the ICC system was provided to the NRC for review by a Duke letter dated July 1, 1985 and NRC approval of the design of the system was provided by a NRC letter dated May 1, 1987.

Each of the ICC subsystems are identified in Table 3.5.6-1 (Items 6-10). The minimum number of operable channels and when the subsystem is required are indicated in the table. In addition, actions to be taken when the number of operable channels falls below the limit given in the table is specified by Specification 3.5.6.2. Except for the SMM and CET subsystems, the action to be taken is to provide a report to the NRC discussing the cause of inoperability and the plans and schedule for restoring the inoperable instrument channels to operable status. For the SMM subsystem, the action taken when the number of operable channels falls below the specified limit given in the table, is to eventually bring the effected unit(s) to a hot shutdown condition(s) and then below 300 degrees-F. For the CET subsystem, the action taken when the number of operable trains falls below the specified limit given in the table is to eventually bring the effected unit(s) to hot shutdown condition(s). Lack of a shutdown action statement for the HLLM, RVHLM, and RCPM does not infer these systems will not be maintained.

The guidance offered by Generic Letter 83-37, recommended that the effected unit be in a hot shutdown condition if the number of operable channels is less than the specified minimum. Duke considers that the above recommendation offered by the Generic Letter to be inappropriate for Oconee. A more appropriate response would be to advise the NRC of the problem and plans to correct the situation.

The only Design Basis Accident (DBA) which would result in ICC conditions is a large break Loss of Coolant Accident. The unavailability of the information provided by the HLLM, RVHLM, and the RCPM subsystems will not prevent the operator from responding to and mitigating the consequences of any DBA identified in the Oconee FSAR.

The CET, HLLM, RVHLM, and RCPM provide information to the operators for the mitigation and recovery from extremely low probability beyond DBA scenarios

which result in ICC conditions. Specifically, the CETs are utilized as the key symptom to identify superheated conditions following a loss of subcooling. Therefore, while an action statement requiring a unit shutdown is in order for the subcooling monitors since loss of subcooled margin may be the result of all but the very small break LOCAs, action statements requiring unit shutdown are inappropriate for the HLLM, RVHLM, and the RCPM. While not required for response to a DBA, the importance of the CETs in the Emergency Procedure Guidelines (EPG) makes an action statement requiring a unit shutdown appropriate. GL 83-37 guidance recommends that a number of CETs per quadrant be operable. This recommendation is inappropriate for the design of the Oconee ICC system. There are a total of 24 qualified CETs. 12 qualified CETs per train input to each independent train of process electronics and can be displayed on the associated ICC plasma display. All 24 qualified CETs can be displayed on the Operator Aid Computer (OAC). Location of CETs within the core assures that each train provides a level of radial distribution. However, since there are no operator actions based on CET indications which are quadrant specific, Technical Specification requirements for CET operability should not be on a per quadrant basis.

By a letter dated June 27, 1986 Duke submitted for NRC review the Oconee EPGs for the ICC system. NRC approval of the use of the ICC system was provided by a letter dated September 29, 1987. Although the potential application of the ICC system to identify, mitigate and prevent the approach to actual ICC conditions is discussed, this should not be the basis for requiring the shutdown of the unit. In general, Emergency Procedures are going to identify most, if not all, of the parameters and equipment that can be used by the operator in responding to an event. In this particular case, the information provided by the ICC system (with the exception of the SMM subsystem) is nice to have but is not essential in identifying, mitigating and preventing the approach to ICC conditions. The information provided by the SMM subsystem is considered to be essential, since all plant transients which could lead to ICC conditions will result in a loss of subcooled margin, regardless of the initiating event. Accordingly, a technical specification requirement to shutdown the unit due to the inoperability of the SMM subsystem is included in Oconee's technical specification. Information provided by the CETs is considered the key symptom for identifying superheated conditions following a loss of subcooling.

Further, the proposed action statements are consistent with the commission interim policy statement on technical specification improvements for Nuclear Power Reactors (Federal Register dated February 6, 1987, 52FR3788). As stated in the commission policy statement, "The purpose of Technical Specifications is to impose those conditions or limitations upon reactor operation necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety by establishing those conditions of operation which cannot be changed without prior commission approval and by identifying those features which are of controlling importance to safety." The policy statement also delineated three criteria by which a licensee could determine which LCO should be included in the technical specifications. They are as follows:

Criterion 1: Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary:

Criterion 2: A process variable that is an initial condition of a Design Basis Accident (DBA) or Transient Analyses that either assumes the failure of or presents a challenge to the integrity of a fission product barrier:

Criterion 3: A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Basis Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier:

If the above criteria were applied to the CET subsystem, HLLM subsystem, RVHLM subsystem and the RCPM subsystem, the result would be that these subsystems would not be incorporated into the Technical Specifications.

Briefly, these instruments provide information concerning ICC conditions and are not capable of detecting excessive reactor coolant leakage, and as such do not indicate the status of the reactor coolant pressure boundary. Thus, these instruments are not capable of detecting a significant abnormal degradation of the reactor coolant pressure boundary. As indicated earlier, the information provided by these instruments will assist the operator in monitoring and responding to an event but is not essential. If the information was not available, the operator would still be able to monitor and respond to an event (i.e. SMM subsystem or RCS pressure and temperature indications, etc.).

For criterion 2, these instruments do not provide any direct information for any parameters which are monitored and controlled during power operation that are assumed in the design basis accident and transient analysis. Information that assures that the plant is operated within the bounds of the initial conditions assumed in the design basis accident and transient analysis are provided by other instrumentation. Accordingly, criterion 2 is not applicable.

In addressing criterion 3, the information provided by these instruments are not part of the primary success path in mitigating a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier (i.e. fuel cladding, reactor vessel, containment). The information provided will aid the operator in monitoring the course of the event. However, the various systems responses to and the operator actions taken in order to mitigate the consequences of an event that involves ICC conditions can be performed without the information from these instruments. As such, it is concluded that these instruments are not part of the primary success path of a design basis accident or transient. In addition, these instruments do not provide any direct information concerning the status of the integrity of any fission product barrier.

As discussed above, the three criteria provided by the commission policy statement are not satisfied. Accordingly these instruments are not required, in accordance with the commission policy statement, to be included in technical specifications.

DUKE POWER COMPANY

OCONEE NUCLEAR STATION

Attachment 3

No Significant Hazards Consideration Evaluation

No Significant Hazards Consideration Evaluation

Duke has determined that the proposed amendment request poses no significant hazards as defined by NRC regulations in 10CFR 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.

This proposal includes administrative changes to the Table of Contents, Limiting Conditions for Operation (LCO) of Inadequate Core Cooling (ICC) instrumentation, and surveillance requirements for ICC instrumentation. Changes proposed within Duke's October 8, 1984 amendment request (with the exception of changes to page 6.4-1 which were approved by amendment numbers 146/146/143) as well as the August 27, 1985 and September 19, 1986 supplements are provided for completeness in Attachment 1. However, the Technical Justification and No Significant Hazards Consideration Evaluation remain unchanged from the original submittals.

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 changes proposed in this amendment request have been determined to be similar to either Example (i) or (ii). Specific proposed changes are discussed below and are categorized in accordance with 48FR14870 guidance.

1) Table of Contents, page iii. Specification 3.1.12 Reactor Coolant System Subcooling Margin Monitors has been relocated, LCO's for the subcooling monitors are now included within the requirements of proposed Specification 3.5.6. Thus, the title of Specification 3.1.12 has been deleted from the Table of Contents. This change provides consistency throughout the Technical Specifications and is therefore considered to be administrative in nature (48FR14870 Example i).

2) Page 3.1-24. Specification 3.1.12 Reactor Coolant System Subcooling Margin Monitors has been relocated. LCOs for the subcooling monitors are included within Specification 3.5.6. This change provides consistency throughout the Technical Specifications and is therefore considered to be administrative in nature (48FR14870 Example i).

3) Page 3.5-44, Specification 3.5.6. Specification 3.5.6 has been updated to include the relocated LCO's for the subcooling monitors (from current Specification 3.1.12) per the November 19, 1987 NRC Technical Evaluation Report (TER) recommendations. Specifically, the LCO's for the subcooling monitors are included as proposed Specifications 3.5.6.2.b(1) and (2). This change provides consistency throughout Technical Specifications by locating the requirements for all accident monitoring instrumentation within the same specification.

The number of operable subcooling monitors required in Specification 3.5.6 is identical to the number required in the current Specification 3.1.12 (one hot leg and the core, or both hot legs). However, the number of subcooling monitors which provide direct control room indication has been increased due to installation of the ICC instrumentation system. As such, this change is considered to be purely administrative in nature (48FR14870 Example i).

4) Page 3.5-44, Specification 3.5.6. Specification 3.5.6 has been updated to include LCOs for the core exit thermocouple trains. Specifically, the LCOs for the core exit thermocouple trains are included as proposed Specification 3.5.6.2.c. This change is considered to be an additional restriction not presently included in Technical Specifications (48FR14870 Example ii).

5) Page 3.5-45, Specification 3.5.6 Bases. The Bases of Specification 3.5.6 have been updated to include information regarding the subcooling monitors and core exit thermocouple trains. This change supports the relocation of Specification 3.1.12 requirements and is therefore considered to be purely administrative in nature (48FR14870 Example i).

6) Page 3.5-46, Table 3.5.6-1. Table 3.5.6-1 Accident Monitoring Instrumentation has been updated to include operability requirements for Wide Range Hot Leg Level, Reactor Vessel Head Level, Reactor Coolant Pump Current, Qualified Core Exit Thermocouples, and Subcooling Monitors by the addition of Item numbers 6 through 10 respectively. In addition, footnotes b, c, d, and e have been included to further clarify the operability requirements and applicability of the Specification. This change is therefore considered to be an additional restriction not presently included in Technical Specifications (48FR14870 Example ii).

7) Page 3.5-46, Table 3.5.6-1. Footnote a in Table 3.5.6-1 Accident Monitoring Instrumentation has been revised to indicate that the Table is applicable above hot shutdown conditions. This change provides consistency with action statements in Specification 3.5.6.2 and GL 83-37. This change is therefore considered to be administrative in nature (48FR14870 Example i).

8) Page 4.1-8a, Table 4.1-1. Table 4.1-1 Instrument Surveillance Requirements has been updated to include surveillance requirements for Wide Range Hot Leg Level, Reactor Vessel Head Level, Reactor Coolant Pump Current, Qualified Core Exit Thermocouples, and Subcooling Monitors by the addition of item numbers 59 through 63 respectively.

Functional testing requirements for the subcooling monitors associated with the OAC have been relocated from Table 4.1-2. Additional surveillances beyond current Table 4.1-2 requirements are included. Specifically, a monthly channel check to verify that gross error does not exist between ICC and OAC displays will be performed, a refueling frequency calibration of inputs to the ICC and OAC, and a refueling frequency test of ICC and OAC software will be performed.

These requirements therefore constitute additional restrictions not presently included in Technical Specifications (48FR14870 Example ii).

9) Page 4.1-9, Table 4.1-2. Table 4.1-2 Minimum Equipment Test Frequency Item 12 regarding the functional test of the subcooling monitors has been relocated to Table 4.1-1 as Item 63. This change provides consistency throughout Technical Specifications by locating surveillance requirements for all accident monitoring instrumentation with the same Specification and is therefore considered to be administrative in nature (48FR14870 Example i).

The following evaluation measures aspects of this amendment request 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.

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. By letter dated May 1, 1987, the NRC provided an evaluation of the ICC instrumentation system design and found the system to be acceptable. In addition, the system design features were all found to satisfy the requirements of NUREG-0737. By letter dated September 29, 1987, the NRC provided a safety evaluation for use of ICC instrumentation in Emergency Procedure Guidelines (EPG). Within the safety evaluation, the NRC found that the approach proposed by Duke was prudent and reasonable and the EPG's submitted by Duke letter dated June 27, 1986 are an acceptable method for using ICC instrumentation. Therefore the design and use of ICC instrumentation has been previously reviewed and approved by the NRC.

Each accident analysis 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 additional requirements for operability and surveillance of accident monitoring instrumentation is not considered to be an initiator or contributor to any accident analysis addressed in the Oconee FSAR. As such, this change will not involve a significant increase in the probability or consequences of previously evaluated accidents.

Second Standard

(Amendment would not) 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 the Technical Specifications or changes which are purely administrative in nature. Further, the design and use of ICC instrumentation has been previously reviewed and approved by the NRC. Consequently, this change will 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.

These changes constitute either additional restrictions not presently included in Technical Specifications or changes which are purely administrative in nature. Additional requirements for operability and surveillance of accident monitoring instrumentation will not impact any margins of safety. Further, the design and use of ICC instrumentation has been previously reviewed and approved by the NRC. As such, there will be no significant reduction in any margin of safety.

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