3.1.12 Reactor Coolant System Vents

Specification

3.1.12.1 a. The following reactor coolant system vent paths shall be operable whenever the reactor coolant average temperature is above 200° F.

1) Reactor Vessel Head Vent
2) Pressurizer Steam Space Vent (through PORV)
3) RCS Loop A High Point Vent
4) RCS Loop B High Point Vent

In order for a vent path to perform its intended safety function of venting, the two electrically-operated valves must be capable of being opened, and all manual valves must be open.

b. If one RCS vent path is inoperable, the vent path shall be restored to operable status within 30 days, or the unit shall be in hot shutdown within the next 12 hours and below 200° F in an additional 24 hours.

c. If more than one RCS vent path is inoperable, the RCS vents shall be restored to a status such that not more than one vent path is inoperable within 72 hours, or the unit shall be in hot shutdown within the next 12 hours and below 200° F in an additional 24 hours.

Bases

Reactor Coolant System Vents are provided to exhaust noncondensible gases and/or steam from the primary system that could inhibit natural circulation core cooling. The RCS vents have two valves in series which are capable of being powered from emergency buses. The valves are normally closed with power removed to prevent inadvertent opening of the valves.

Guidance for these requirements was provided by Item II.B.1 of NUREG-0737, "Classification of TMI Action Plan Requirements", October 1980, and by Generic Letter No. 83-37, "NUREG-0737 Technical Specifications", November 1983.

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.

Alternate methods for monitoring containment high range radiation during inoperability of RIA-57 and RIA-58 shall include extrapolation of readings from portable radiation monitors in penetration rooms or outside containment.

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 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)	NA	MO	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

DUKE POWER COMPANY

OCONEE NUCLEAR STATION

Attachment 2

No Significant Hazards Consideration Evaluation

and

Technical Justification

No Significant Hazards Consideration Evaluation and Technical Justification.

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.

Changes to Technical Specifications proposed within this amendment request include: administrative changes to the Table of Contents, more stringent operability requirements for the Reactor Coolant System (RCS) High Point Vents, additional bases for the RCS High Point Vents, additional bases for the Containment High Range Radiation Monitors, and updated surveillance requirements for the Containment Hydrogen Monitors. These changes are in response to a November 19, 1987 NRC Technical Evaluation Report (TER) regarding Oconee's conformance to NUREG 0737 Action Items requiring Technical Specifications. In the January 18, 1988 response to the TER, Duke committed to providing the subject revisions to Technical Specifications previously submitted for the RCS High Point Vents (Item II.B.1), Containment High Range Radiation Monitors (Item II.F.1.3), and Containment Hydrogen Monitors (Item II.F.1.6).

Technical Specifications associated with NUREG 0737 Items II.B.1, II.F.1.3, and II.F.1.6 included within this amendment request are considered to be a separate licensing action from the design and modifications associated with the subject NUREG 0737 Items. Further, by letter dated November 2, 1983, the NRC staff found that the RCS high point vent system at Oconee is acceptable and in conformance with the requirements of 10CFR50.44(c)(3)(iii) and the guidelines of NUREG 0737 Item II.B.1 and NUREG 0800 Section 5.4.12. On March 18, 1983, the NRC issued an order confirming commitments to implement NUREG 0737 Items II.F.1.3 and II.F.1.6 (among others). By letter dated September 1, 1983, the NRC staff concluded that the requirements of NUREG 0737 Item II.F.1.6 have been met.

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 within 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 3.1.13 Reactor Coolant System Vents has been renumbered as Specification 3.1.12. This change provides consistency with the relocation of Specification 3.1.12 requirements previously proposed within the March 15, 1988 amendment request. Specification 3.1.13 was proposed within the August 13, 1986 amendment request. This change provides consistency throughout the Technical Specifications and is therefore considered to be purely administrative in nature (48FR14870 Example i).

2) Page 3.1-24. Specification 3.1.12 Reactor Coolant System Vents includes all requirements originally proposed as Specification 3.1.13 within the August 13, 1986 amendment request. Specification 3.1.13 was renumbered as Specification 3.1.12 to provide consistency with the relocation of Specification 3.1.12 requirements previously proposed within the March 15, 1988 amendment request. This change provides consistency throughout the Technical Specifications and is therefore considered to be purely administrative in nature (48FR14870 Example i).

As recommended in the November 19, 1987 TER operability of the RCS high point vents is required above 200 degrees-F rather than 250 degrees-F. This change constitutes an additional restriction not presently included in Technical Specifications (48FR14870 Example ii).

As discussed in the January 18, 1988 Duke response to the TER, Specifications 3.1.12.1.b and c require that the unit be in hot shutdown in 12 hours and below 200 degrees-F rather than 250 degrees-F in an additional 24 hours if RCS high point vent paths are inoperable. This change is considered to be an additional restriction not presently included in the Technical Specifications (48FR14870 Example ii).

As discussed in the January 18, 1988 Duke response to the TER, a discussion concerning RCS high point vent valves is provided in the bases of Specification 3.1.12. The RCS high point vents have two valves in series which are capable of being powered from emergency buses. The valves are normally closed with power removed to prevent inadvertent opening of the valves. In addition, in order to provide consistency with revised temperature requirements in Specification 3.1.12, statements concerning 250 degrees-F temperature requirements have been deleted from the Bases. As Bases are not a part of the Technical Specifications (in accordance with 10CFR50.36(a)) and are therefore not incorporated into the facility operating licenses, no license amendment is necessary prior to updating the Bases. The above information regarding RCS High Point Vent Bases is included for information only.

3) Page 3.5-45. Specification 3.5.6 Accident Monitoring Instrumentation Bases has been updated per Duke's January 18, 1988 TER response to include a discussion of alternate methods for monitoring containment high range radiation during inoperability of RIA-57 and RIA-58. Specifically, containment high range radiation can be monitored by extrapolating readings from portable radiation monitors in penetration rooms or outside containment. As Bases are not a part of the Technical Specifications (in accordance with 10CFR50.36(a)) and are therefore not incorporated into the facility operating licenses, no license amendment is necessary prior to updating the Bases. The above information regarding alternate methods for monitoring containment high range radiation is included for information only.

4) Page 4.1-8a, Table 4.1-1 Instrument Surveillance Requirements. As discussed in Duke's January 18, 1988 response to the TER, the surveillance requirements for the Containment Hydrogen Monitor found in Table 4.1-1 Item 57 have been revised to conform to definitions of channel check, test, and calibration specified in Oconee Technical Specifications.

As presently defined in Oconee's Technical Specifications, an instrument channel check is a verification of acceptable instrument performance by observation of its behavior and/or state. This verification includes comparison of output and/or state of independent channels measuring the same variable. Even though there are two Containment Hydrogen Monitors, they are left in standby unless being calibrated, tested or used in an accident situation. Based on this information, a routine channel check would be meaningless and is thus revised to be "N/A" in the surveillance requirements.

The Oconee Technical Specifications define a channel test as the injection of an internal or external test signal into the channel to verify its proper output response; including alarm and/or trip initiating action where applicable. Oconee performs a test on these monitors by turning them on, injecting a known source of hydrogen and nitrogen (approximately 10% Hydrogen with the balance Nitrogen) and reading the scale. If there is a discrepancy between the source and the reading, the monitor is adjusted for the correct reading. The monitors are then returned to standby. The Surveillance Requirements for the Containment Hydrogen Monitor Test have therefore been revised to "MO".

These changes provide consistency throughout the Technical Specifications and are 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. The changes proposed in this amendment request are in response to the NRC review of GL 83-37 Items II.B.1 (RCS High Point Vents) II.F.1.3 (Containment High Range Radiation Monitors), and II.F.1.6 (Containment Hydrogen Monitors). This review was documented in a November 19, 1987 TER.

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 more stringent RCS High Point Vent operability requirements, and administrative changes to Technical Specifications are 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 Technical Specifications or changes which are administrative in nature. Further, these changes are in response to the NRC review of GL 83-37 Items II.B.1, II.F.1.3, and II.F.1.6. Consequently, these changes 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 administrative in nature. More stringent RCS high point vent operability requirements, and administrative changes to Technical Specifications will not impact any margins of safety. As such, there will be no significant reduction in any margin of safety.

Duke has concluded based on the above evaluation that there is a No Significant Hazards Consideration involved in this amendment request.