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SUBJECT: Application for amends to Licenses DPR-38, DPR-47 & DPR-55
 re RCS high point vents & noble gas effluent monitors.

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DUKE POWER

May 17, 1989

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Generic Letter 83-37
TAC Nos. /54402, /54403, /54404, /54551, /54552, /54553
/68080, /68081, /68082, /64664, /64665, 64666

Gentlemen:

By letter dated November 1, 1983, the NRC provided Generic Letter (GL) 83-37. By letter dated October 8, 1984 as supplemented to present, I provided a response to GL 83-37 and proposed Technical Specifications pertaining to NUREG 0737 items implemented after December 31, 1981. Within this correspondence I have provided detailed technically accurate discussions regarding the design and licensing basis for these items including discussion concerning their applicability for inclusion within Technical Specifications. Following teleconferences involving myself, my staff, and NRC staff on May 9-11, 1989, we agreed to resubmit Technical Specifications regarding NUREG 0737 Items /II.B.1 (Reactor Coolant System (RCS) High Point Vents), II.F.1.1 (Noble Gas Effluent Monitors), II.F.1.3 (Containment High Range Radiation Monitors), II.F.1.4 (Containment Pressure Monitor), II.F.1.5 (Containment Water Level), II.F.1.6 (Containment Hydrogen Monitors), II.F.2 (Inadequate Core Cooling Instrumentation), and III.D.3.4 (Control Room Habitability). With the exception of Item III.D.3.4, hardware issues associated with these Technical Specifications have been resolved. Regarding RCS High Point Vents and Noble Gas Effluent Monitors, I concur with the NRC staff position that Limiting Conditions for Operation (LCO) and surveillance requirements for these items be relocated to the Final Safety Analysis Report (FSAR) as selected licensee commitments. Attachment 1 details our commitments with regard to these items. Appropriately revised FSAR pages will be submitted by October 1, 1989.

With regard to the remainder of the items, Attachment 2 provides proposed Technical Specifications which are consistent with the proposal verbally agreed to by the NRC staff. As such, pursuant to 10CFR50, 50.90, Attachment 2 provides a proposed amendment to the Oconee Nuclear Station (ONS) Facility Operating Licenses and revisions to ONS Technical Specifications. I have determined the attached proposed amendment as having no significant hazards considerations. Attachment 4 provides the No Significant Hazards Consideration Evaluation. I am providing a copy of this application to the South Carolina Department of Health and Environmental Control for review and, as appropriate, subsequent consultation with the staff.

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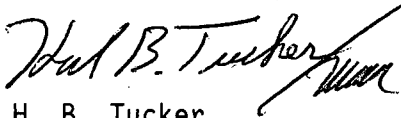
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May 17, 1989
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Technical Specifications with shutdown requirements have been included for containment high range radiation monitors, containment wide range water level monitors, containment hydrogen monitors, reactor vessel level indication system, and control room habitability systems. However, from a nuclear safety point of view, Duke and the Babcock and Wilcox Owners Group contend that a forced shutdown would be an inappropriate response to the inoperability of these instruments or systems. This conclusion is based on knowledge and experience gained since the development and issuance of Generic Letter 83-37. In order to assure the technical basis for these Specifications is adequately documented, Attachment 3 provides brief discussions of these issues including examples of recent NRC action. Upon completion of an appropriate technical review, we will by separate correspondence propose any appropriate changes to these Specifications.

In order to assure that future resolutions of regulatory issues are accomplished in an efficient and effective manner, I have directed that my staff, with input from the NRC staff, develop a priority list of regulatory issues. The purpose of the list will be to assure resources are effectively applied to provide technically accurate review and timely resolution of these issues.

Very truly yours,



H. B. Tucker

PJN/vm

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Attachment 1

Reactor Coolant System High Point Vents

Noble Gas Effluent Monitors

Licensee Commitments

Reactor Coolant System Vents

Commitment

- 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.
- d. Trial testing of the head vent and loop high point vent flow paths with air or nitrogen will be performed during the next Unit 2 outage. Future testing of the flow paths will be based on trial results.
- e. Testing of high point vent valves will be performed in accordance with ASME Section XI.

Bases

Reactor Coolant System Vents are provided to exhaust noncondensable 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 commitments 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.

Noble Gas Effluent Monitor (RIA-56)

Commitment

- a. If the Noble Gas Effluent Monitor (RIA-56) is inoperable, and alternative noble gas monitoring program shall be instituted within 72 hours.
- b. A channel functional test shall be performed on a monthly frequency.
- c. A channel calibration shall be performed on an annual frequency.

Bases

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