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See Proposed Change To Tech Specs

SUBJECT: Application for amends to licenses DPR-38,DPR-47 & DPR-55, respectively.Amends consist of proposed changes to Bases of TS 3.3.1 & Section 15.14 of UFSAR.

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September 4, 1997

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Request for License Amendment for the High Pressure Injection (HPI) System

Pursuant to 10 CFR 50.90, Duke Energy Corporation (Duke) hereby requests an amendment to Facility Operating License Nos. DPR-38, DPR-47, and DPR-55 for Oconee Nuclear Station Units 1, 2, and 3, respectively. The amendment consists of proposed changes to the Bases of Technical Specification 3.3.1 and Section 15.14 of the Oconee UFSAR as provided in Attachment 1. This amendment is requested because of an unreviewed safety question associated with the implementation of revised small break LOCA analyses at Oconee Nuclear Station. The technical justification for the amendment is included in Attachment 2. Attachments 3 and 4 contain the No Significant Hazards Consideration Evaluation and Environmental Assessment, respectively.

In November of 1990, Duke determined that the technical basis for the HPI Technical Specification was inadequate. Specifically, the small break LOCA analyses which justified the requirement for only two operable HPI pumps at or below 60% FP had not considered the full spectrum of small break LOCAs. This issue was reported to the NRC in LER 269/90-15.

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To address this deficiency, Oconee implemented Technical Specifications Interpretation 3.3.1, High Pressure Injection (HPI) System, on November 26, 1990. This interpretation requires that all three HPI pumps and HP-409 and HP-410 shall be operable and valves HP-99 and HP-100 shall be open as specified by Technical Specification 3.3.1(c) whenever RCS temperature is greater than 350°F. Duke also initiated efforts to perform revised small break LOCA analyses to

determine the appropriate HPI System operability requirements. These revised analyses are based on FTI topical report BAW-10192P, Rev. 0, "BWNT Loss-of-Coolant Accident Evaluation Model for Once-Through Steam Generator Plants." This topical report was approved by the NRC in a safety evaluation dated February 18, 1997.

On March 31, 1997, Duke submitted a proposed Technical Specification amendment to correct the HPI Technical Specification. In addition to correcting the deficiency associated with LER 269/90-15, the March 31, 1997 submittal involves other proposed enhancements to the HPI Technical Specification. In a letter to the NRC dated June 4, 1997, Duke committed to perform a HPI System Reliability Study and submit the results to the staff by December 31, 1997. It is Duke's understanding that the staff has determined that information to be provided in the HPI System Reliability Study is necessary prior to proceeding with a review of the proposed HPI Technical Specification changes submitted on March 31, 1997. Therefore, it appears that the staff's review of this amendment will not be completed until 1998.

Recent performance testing indicates that the Unit 3 HPI pump B (3B pump) may be experiencing some degradation in its developed head. Although the current test results meet the acceptance criteria and the 3B pump is operable, Oconee is carefully monitoring this pump and performing additional periodic testing to assure its continued operability. If the continued monitoring identifies an adverse trend in the developed head, current administrative requirements in Technical Specifications Interpretation 3.3.1 would require a shutdown of Oconee Unit 3 to effect repairs on the pump. However, because the 3A and 3B HPI pumps were recently replaced, it may take several weeks to obtain a replacement pump for the 3B pump. Therefore, based on Oconee's current administrative requirements, an extended shutdown of Oconee Unit 3 could result if repairs to the 3B HPI pump are necessary.

This proposed license amendment justifies the acceptability of the current Technical Specification for the HPI System and would allow continued operation of Oconee Unit 3 at a reduced power level if repairs to the 3B HPI pump are required. Duke has concluded that the revised small break LOCA analyses that support the current operability requirements of Technical Specification 3.3.1 involve an

unreviewed safety question. Specifically, the revised analyses provided in the March 31, 1997 submittal to the staff include operator actions not currently credited in the Oconee licensing basis. These analyses credit operator action to raise steam generator levels and depressurize the steam generators during a small break LOCA. These operator actions have been in the Oconee Emergency Operating Procedure for over 10 years. However, since they have not previously been credited in the licensing basis small break LOCA analyses, Duke has concluded that the revised small break LOCA analyses could not be incorporated in the Oconee UFSAR or Technical Specification Bases under 10 CFR 50.59. Therefore, NRC review and approval of these operator actions is necessary prior to crediting the new analyses as a technical basis for the requirements currently in Technical Specification 3.3.1. It should be recognized that no unreviewed safety question currently exists at Oconee as long as the Technical Specification Interpretation implemented as a corrective action to LER 269/90-15 remains in effect. Approval of this proposed license amendment will allow Duke to revise the UFSAR and Technical Specification Bases and remove the current administrative restrictions associated with Technical Specifications Interpretation 3.3.1.

As stated previously, Duke promptly submitted a license amendment to address the HPI Technical Specification once FTI topical report BAW-10192P was approved by the staff. In addition, the attached proposed license amendment was submitted in a timely manner once the potential for repairs of the 3B HPI pump were realized. Therefore, Duke requests an expedited review of this submittal if subsequent monitoring of the 3B HPI pump determines that repair efforts become necessary. Duke will promptly advise NRR if an expedited review becomes necessary.

This proposed license amendment has been reviewed by both the Plant Operations Review Committee and the Nuclear Safety Review Board. This license amendment will result in changes to Chapter 15 of the Oconee UFSAR and the Bases to Technical Specification 3.3.1 (see Attachment 1). A copy of this application is being forwarded to the South Carolina Department of Health and Environmental Control for their review, and, as appropriate, subsequent consultation with the staff.

Please address any questions to J. E. Burchfield, Jr. at (864) 885-3292 or D. A. Nix at (864) 885-3634.

Very Truly Yours,

W. R. McCollum, Jr.
Site Vice President
Oconee Nuclear Station

xc: D. E. LaBarge, ONRR
Project Manager

L. A. Reyes
Regional Administrator, Region II

M. A. Scott
Senior Resident Inspector

M. Batavia
DHEC

W. R. McCollum, Jr., being duly sworn, states that he is Site Vice President of Duke Energy Corporation, that he is authorized on the part of said Company to sign and file with the Nuclear Regulatory Commission this revision to the Oconee Nuclear Station License Nos. DPR-38, DPR-47, and DPR-55; and that all statements and matters set forth therein are true and correct to the best of his knowledge.

W. R. McCollum, Jr., Site Vice President

Subscribed and sworn to before me 9-4-97
Date

Connie M. Dreagale
Notary Public

My Commission Expires:

2-12-2003