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RA-19-0469

December 18, 2019

10 CFR 50.54(q)
10 CFR 72.44(f)

Attn: Document Control Desk
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, Maryland 20852-2746


Subject: Duke Energy Carolinas, LLC
Oconee Nuclear Station, Units 1, 2, and 3
Docket Nos. 50-269, -270, and -287
Emergency Plan Revisions 2019-005, 2019-006, and 2019-007

Pursuant to 10 CFR 50.54(q), and 10 CFR 72.44(f), Duke Energy is submitting the attached summary of changes to the Oconee Nuclear Station (ONS) Emergency Plan which became effective December 16, 2019.

These revisions have been evaluated in accordance with 10 CFR 50.54(q) and it was determined that the changes did not reduce the effectiveness of the ONS Emergency Plan. The revised ONS Emergency Plan continues to meet the requirements of Appendix E to 10 CFR 50 and the planning standards of 10 CFR 50.47(b).

If there are any questions or concerns pertaining to this revision please call Sheila Dalton, Manager Nuclear Support Services, at 864-873-3657.

Sincerely,


J. Ed Burchfield, Jr.
Vice President
Oconee Nuclear Station

Attachments

Change Summary for ONS E-Plan Revision 2019-005
Change Summary for ONS E-Plan Revision 2019-006
Change Summary for ONS E-Plan Revision 2019-007

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xc: Ms. Laura Dudes
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Ms. Audrey Klett
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Mr. Jared Nadel
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Oconee Nuclear Station

CHANGE SUMMARY FOR ONS E-PLAN REVISION 2019-005

Under ML19058A632 Oconee Nuclear Station's Section D revision 2019-005 includes changes to EALs and the technical basis for the following EALs:

- CA6.1 Alert
- Removed HG1.1
- SA9.1 Alert

ML19058A632 Letter dated July 1, 2019. Subject: Catawba Nuclear Station, Units 1 And 2; McGuire Nuclear Station, Units 1 And 2; Oconee Nuclear Station, Units 1, 2, And 3; Brunswick Steam Electric Plant, Units 1 And 2; Shearon Harris Nuclear Power Plant, Unit 1; And H. B. Robinson Steam Electric Plant, Unit No. 2 – Issuance of Amendments To Revise Emergency Action Level Schemes To Incorporate Clarifications Provided By Emergency Preparedness Frequently Asked Questions 2015-013, 2015-014, And 2016-002 (EPID L-2018-LLA-0174)

Amendment Nos. 303 and 299 to Renewed Facility Operating License Nos. NPF-35 and NPF-52 for the Catawba Nuclear Station, Units 1 and 2 (Catawba), respectively; Amendment Nos. 315 and 294 to Renewed Facility Operating License Nos. NPF-9 and NPF-17 for the McGuire Nuclear Station, Units 1 and 2 (McGuire), respectively; Amendment Nos. 412, 414, and 413 to Renewed Facility Operating License Nos. DPR-38, DPR-47, and DPR-55 for the Oconee Nuclear Station, Units 1, 2, and 3 (Oconee), respectively; Amendment Nos. 291 and 319 to Renewed Facility Operating License Nos. DPR-71 and DPR-62 for Brunswick Steam Electric Plant, Units 1 and 2 (Brunswick), respectively; Amendment No. 172 to Renewed Facility Operating License No. NPF-63 for the Shearon Harris Nuclear Power Plant, Unit 1 (Harris); and Amendment No. 264 to Renewed Facility Operating License No. DPR-23 for the H. B. Robinson Steam Electric Plant, Unit No. 2 (Robinson).

CHANGE SUMMARY FOR ONS E-PLAN REVISION 2019-006

Attachment to 50.54q CHANGE MATRIX				
#	Page /Section	Current	Proposed Change	Reason
1.	D-100 CA6.1 new paragraphs inserted prior to last paragraph	N/A	<p>An event affecting equipment common to two or more safety systems or safety system trains (i.e., there are indications of degraded performance and/or VISIBLE DAMAGE affecting the common equipment) should be classified as an Alert under CA6, as appropriate to the plant mode. By affecting the operability or reliability of multiple system trains, the loss of the common equipment effectively meets the two-train impact criteria that underlie the EALs and Bases.</p> <p>An event affecting a single-train safety system (i.e., there are indications of degraded performance and/or VISIBLE DAMAGE affecting the one train) would not be classified under CA6 because the two-train impact criteria that underlie the EALs and Bases would not be met. If an event affects a single-train safety system, then the emergency classification should be made based on plant parameters/symptoms meeting the EALs for another IC. Depending upon the circumstances, classification may also occur based on Shift Manager/Emergency Director judgement.</p> <p>An event that affects two trains of a safety system (e.g., one train has indications of degraded performance and the other VISIBLE DAMAGE) that also has</p>	Additional Clarification added from EPFAQ 2018-04

CHANGE SUMMARY FOR ONS E-PLAN REV 2019-006 (Cont'd)

Attachment to 50.54q CHANGE MATRIX				
#	Page /Section	Current	Proposed Change	Reason
			one or more additional trains should be classified as an Alert under CA6, as appropriate to the plant mode. This approach maintains consistency with the two-train impact criteria that underlie the EALs and Bases, and is warranted because the event was severe enough to affect the operability or reliability of two trains of a safety system despite plant design criteria associated with system and system train separation and protection. Such an event may have caused other plant impacts that are not immediately apparent.	
2.	D-181 SA9.1 new paragraphs inserted prior to last paragraph	N/A	<p>An event affecting equipment common to two or more safety systems or safety system trains (i.e., there are indications of degraded performance and/or VISIBLE DAMAGE affecting the common equipment) should be classified as an Alert under SA9, as appropriate to the plant mode. By affecting the operability or reliability of multiple system trains, the loss of the common equipment effectively meets the two-train impact criteria that underlie the EALs and Bases.</p> <p>An event affecting a single-train safety system (i.e., there are indications of degraded performance and/or VISIBLE</p>	Additional Clarification added from EPFAQ 2018-04

CHANGE SUMMARY FOR ONS E-PLAN REV 2019-006 (Cont'd)

Attachment to 50.54q CHANGE MATRIX				
#	Page /Section	Current	Proposed Change	Reason
			<p>DAMAGE affecting the one train) would not be classified under SA9 because the two-train impact criteria that underlie the EALs and Bases would not be met. If an event affects a single-train safety system, then the emergency classification should be made based on plant parameters/symptoms meeting the EALs for another IC. Depending upon the circumstances, classification may also occur based on Shift Manager/Emergency Director judgement.</p> <p>An event that affects two trains of a safety system (e.g., one train has indications of degraded performance and the other VISIBLE DAMAGE) that also has one or more additional trains should be classified as an Alert under SA9, as appropriate to the plant mode. This approach maintains consistency with the two-train impact criteria that underlie the EALs and Bases, and is warranted because the event was severe enough to affect the operability or reliability of two trains of a safety system despite plant design criteria associated with system and system train separation and protection. Such an event may have caused other plant impacts that are not</p>	

CHANGE SUMMARY FOR ONS E-PLAN REV 2019-006 (Cont'd)

Attachment to 50.54q CHANGE MATRIX				
#	Page /Section	Current	Proposed Change	Reason
			immediately apparent.	
3.	D-191 Note 9	OR LPI pump(s) are running AND taking suction from the LPI drop line	OR LPI pump(s) are running	RVLS not valid with forced flow, suction source is not significant.
4.	D-191 1st par	RVLS indicated level $\leq 0''$ with all RCPs not running and both LPI pumps taking suction from the drop line not running represents reactor vessel level below the bottom of the RCS hotleg (without instrument uncertainty considered).	RVLS indicated level $\leq 0''$ with all RCPs not running and both LPI pumps not running represents reactor vessel level below the bottom of the RCS hotleg (without instrument uncertainty considered).	RVLS not valid with forced flow, suction source is not significant.
5.	D-203 RCS - Loss inserted between 3rd and 4th par.	N/A	If EOPs direct operators to open the Pressurizer pressure relief valves to implement a core cooling strategy (i.e., a "feed and bleed" cooldown), then there will exist a reactor coolant flow path from the RCS, past the "pressurizer safety and relief valves" and into the containment that operators cannot isolate without compromising the effectiveness of the strategy (i.e., for the strategy to be effective, the valves must be kept in the open position); therefore, the flow through the pressure relief line is UNISOLABLE. In this case, the ability of the RCS pressure boundary to serve as an effective barrier to a release of fission products has been	Additional Clarification added from EPFAQ 2018-01

CHANGE SUMMARY FOR ONS E-PLAN REV 2019-006 (Cont'd)

Attachment to 50.54q CHANGE MATRIX				
#	Page /Section	Current	Proposed Change	Reason
			eliminated and thus this condition constitutes a loss of the RCS barrier	
6.	D-3 first par.Decision-makers responsible for implementation of RP/0/A/1000/001, Emergency Classification, may use this document as a technical reference in support of EAL interpretation.Decision-makers responsible for Emergency Classification may use this document as a technical reference in support of EAL interpretation.	Remove site document reference, superseded by fleet guidance.
7.	D-13 4.2.1	4.2.1 RP/0/A/1000/001 Emergency Classification	4.2.1 AD-EP-ALL-0101 Emergency Classification	Remove site document reference superseded by fleet guidance.

CHANGE SUMMARY FOR ONS E-PLAN REVISION 2019-007

Changed the name and document number for the EAL Technical Basis document for fleet consistency

#		Section or Step	Current wording	Proposed Wording	Reason
1		Title and Document number for Oconee	Emergency Plan Section D Emergency Classification System Emergency Action Level Technical Bases	Oconee CSD-EP-ONS-0101-01, EAL Technical Basis Document	Changed title and document number for fleet consistency

Removing the EAL Technical Basis document out of the Emergency Plan Section D and placing the Technical Basis in a standalone document CSD-EP-ONS-0101-01. The EAL Technical Basis will be incorporated into the emergency plan by reference. Section D will refer directly to the CSD.