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REMARKS: *****PAGES DATED 02/17/00*****

W R MCCOLLUM
VICE PRESIDENT
OCONEE NUCLEAR SITE

BY:
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February 23, 2000

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

Subject: Oconee Nuclear Station
Docket 50-269, -270, -287
Selected Licensee Commitments Manual (SLC)

Gentlemen:

Pursuant to 10CFR 50.4 and 50.71, please find attached 7 copies of the latest revisions to the Oconee Selected Licensee Commitments Manual (SLC). The SLC Manual is Chapter 16.0 of the Oconee Updated Final Safety Analysis Report (UFSAR). This manual is intended to contain commitments and other station issues that warrant higher control, but are not appropriate for inclusion into the Technical Specifications (TS). Instead of being updated with the annual UFSAR Update, the SLC Manual will be updated as necessary throughout the year.

Very truly yours,

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

CMB/cmb
Attachment

xc: Luis A. Reyes
Regional Administrator, Region II

D. E. LaBarge, ONRR

M. C. Shannon
Oconee Senior Resident Inspector

Bxc: ELL
ONS Document Management

February 22, 2000

To: Manual Holders

Subject: Oconee Selected Licensee Commitments Manual (SLC) Revision

On February 16, 2000, Station Management approved new SLC 16.7.14 to be implemented on 2/17/00. The new SLC defines actions to be taken when the Rod Withdrawal (insertion) Limit Alarm is inoperable. This guards against fast dilution event in mode 1.

Remove these pages	Insert these pages
LOEP 1	LOEP 1
LOEP 4	LOEP 4
------	SLC PAGE 16.7.14-1
------	SLC PAGE 16.7.14-2
------	SLC PAGE 16.7.14-3
------	SLC PAGE 16.7.14-4

Any questions concerning this revision may be directed to Ed Price at ext. 4388.

Regulatory Compliance
By: Conice Breazeale
Regulatory Compliance

Oconee Nuclear Station
Selected Licensee Commitments
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2/17/00

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16.7 INSTRUMENTATION

16.7.14 Rod Withdrawal Limit Alarm

COMMITMENT One Rod Withdrawal Limit Alarm shall be OPERABLE.

APPLICABILITY: MODE 1 when Regulating Rods are in Automatic Control

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. Rod Withdrawal Limit Alarm inoperable.	A.1	Verify regulating rod groups meet the position limits as specified in the COLR.	2 hours AND Once per 30 minutes thereafter
	AND		
	A.2	Limit Makeup flow to < 110 gpm	2 hours
	AND		
	A.3	Limit Letdown flow to < 110 gpm	2 hours
B. Makeup or Letdown flow not limited to < 110 gpm as required by Actions A.2 and A.3 above	B.1	Verify regulating rod groups meet the position limits as specified in the COLR	15 minutes AND Once per 15 minutes thereafter

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 16.7.14.1	Verify ROD Withdrawal limit alarm values are established consistent with the COLR.	18 months

BASES

BACKGROUND

The Rod Withdrawal Limit Alarm is relied upon to alert the operator of a sudden boron dilution event. The alarm is provided by the OAC. Whenever the computer is out of service, a manual surveillance of the regulating rod position is required at 30 minute intervals to ensure a dilution event is not occurring.

APPLICABLE SAFETY ANALYSES

The Moderator Dilution Accident is analyzed in Reference 1. The analysis for when the reactor is in MODE 1, with the CONTROL RODS in automatic, relies on the Rod Withdrawal Limit Alarm to alert the operators that a dilution event is in progress. The operators then have 15 minutes to stop the dilution. No other moderator dilution scenario analyzed in Reference 1 relies on this alarm function. The consequence of diluting the CONTROL RODS beyond the withdrawal limit is the possible loss of SHUTDOWN MARGIN in the event of a reactor trip.

The alarm requires that the OAC be operable. If the OAC is operable, the alarm is considered operable. This is valid based on the low probability of losing the alarm function itself without losing any other sub-system of the OAC thus rendering the OAC itself inoperable.

The time available to the operator to stop the dilution following receipt of the alarm is dependent on the dilution flow rate, the boron concentration of the dilution source, and the available SHUTDOWN MARGIN following reactor trip. The worst combination of these is assumed in the Reference 1 analysis. If the Alarm is unavailable, then the potential dilution flowrates are controlled such that there exists 30 minutes before operator action is required to mitigate the event.

COMMITMENT

This Commitment provides controls to ensure that the rod withdrawal limit alarm is OPERABLE. The rod withdrawal limit alarm is credited for mitigating a boron dilution event in MODE 1 with the CONTROL RODS in automatic control.

APPLICABILITY

In MODE 1 when Regulating Rods are in Automatic Control.

In MODES 2, 3, 4, 5 and 6 the regulating rods are not credited.

ACTIONS A.1

When the rod withdrawal limit alarm is inoperable, regulating rod groups shall be verified to meet the position limits as specified in the COLR within 2 hours of losing the alarm and once every 30 minutes thereafter.

This Action allows the operators 2 hours before the first rod position surveillance is performed. This is judged acceptable given the low probability that a dilution event is in progress immediately following the loss of OAC, the time required to enter the procedure and perform the higher priority functions first, and the fact that the rod positions are verified frequently while the OAC is available. After the first 2 hours, the rod positions shall be verified manually once per 30 minutes to prevent the loss of shutdown margin while a dilution event is in progress. With administrative controls in place to limit the dilution flow rate to less than 110 gpm, 30 minutes is the allowable time to recognize that a dilution event is in progress and allow the operators 15 minutes to stop the dilution event.

A.2

This action places administrative controls on makeup flow within 2 hours following the entrance to the loss of OAC procedure to ensure a dilution rate cannot exceed 110 gpm.

A.3

This action places administrative controls on letdown flow within 2 hours following the entrance to the loss of OAC procedure to ensure a dilution rate cannot exceed 110 gpm.

B.1

This action requires the rod positions be verified once per 15 minutes to prevent the loss of shutdown margin whenever a dilution event of > 110 gpm is possible. It is applicable whenever makeup and letdown flows are not limited to less than 110 gpm

SURVEILLANCE REQUIREMENTS SR 16.7.14.1

This SR requires verification that the ROD Withdrawal limit alarm values are established consistent with the COLR.

REFERENCES 1. UFSAR, Section 15.4