

Standards for determining whether a license amendment involves no significant hazards considerations are contained in 10CFR50.92(c). The TS [Technical Specification] changes and modifications as proposed in this LAR [license amendment request] have been evaluated in accordance with 10 CFR 50.92 and determined not to involve any significant hazards considerations.

The proposed LAR includes (1) implementing the AST [alternate source term] for accident analysis as described in Regulatory Guide 1.183; (2) removing the PRVS [penetration room ventilation system] and relaxing the SFPVS [spent fuel pool ventilation system] TS because they are no longer credited for Control Room and off-site doses; (3) revising the CRVS [control room ventilation system] to allow for a one time completion time extension on Conditions B and C when entering the conditions to support implementation of the Control Room intake/booster fan modification; (4) lowering the Reactor Building leakage rate from 0.25 w%/day to 0.20 w%/day; (5) revising the VFTP [ventilation filter testing program] radioactive methyl iodide removal acceptance criterion for SFPVS and CRVS Booster Fan trains; and (6) adoption of TSTF [Technical Specification Task Force]-51.

Plant modifications are also being proposed in concert with the proposed TS changes. They include relocating the existing Control Room outside air intake from the roof of the Auxiliary Building to the roof of the Turbine Building and installing dual intakes for each Control Room; re-routing HPI [high-pressure injection]/LPI [low-pressure injection] relief valve discharge back into the Reactor Building and replacing the existing Caustic Addition system with a passive system.

As a result of this evaluation, Duke has concluded:

1. The proposed amendment will not involve a significant increase in the probability of consequences of an accident previously evaluated.

The AST and those plant systems affected by implementing the proposed changes to the TS are not assumed to initiate design basis accidents. The AST does not affect the design or operations of the facility. Rather, the AST is used to evaluate the consequences of a postulated accident. The implementation of the AST has been evaluated in the revisions to the analysis of the design basis accidents for ONS [Oconee Nuclear Station]. Based on the results of these analyses, it has been demonstrated that, with the requested changes, the dose consequences of these events meet the acceptance criteria of 10 CFR 50.67 and Regulatory Guide 1.183. Therefore, the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The AST and those plant systems affected by implementing the proposed changes to the TS are not assumed to initiate design basis

accidents. The systems affected by the changes are used to mitigate the consequences of an accident that has already occurred. The proposed TS changes and modifications do not significantly affect the mitigative function of these systems. Consequently, these systems do not alter the nature of events postulated in the Safety Analysis Report nor do they introduce any unique precursor mechanisms. Therefore, the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The implementation of the AST, proposed changes to the TS and the implementation of the proposed modifications have been evaluated in the revisions to the analysis of the consequences of the design basis accidents for the ONS. Based on the results of these analyses, it has been demonstrated that with the requested changes the dose consequences of these events meet the acceptance criteria of 10 CFR 50.67 following the provisions of Regulatory Guide 1.183. Thus, the proposed amendment will not involve a significant reduction in the margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

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*Duke Energy Corporation, Docket No. 50-270, Oconee Nuclear Station, Unit 2, Oconee County, South Carolina*

*Date of amendment request:* October 28, 2003.

*Description of amendment request:* The proposed amendment would revise the licensing basis in the Updated Final Safety Analysis Report to support installation of a passive low-pressure injection (LPI) cross connect inside containment. The proposed changes would revise the licensing basis for selected portions of the core flood and LPI piping to allow exclusion of the dynamic effects associated with postulated pipe rupture of that piping by application of leak-before-break methodology. A similar amendment was approved for Unit 1 by NRC letter dated September 29, 2003.

*Basis for proposed no significant hazards consideration determination:* As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards

consideration, which is presented below:

Pursuant to 10 CFR 50.91, Duke Power Company (Duke) has made the determination that this amendment request involves a No Significant Hazards Consideration by applying the standards established by the NRC regulations in 10 CFR 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;

The proposed LAR [license amendment request] modifies the Unit 2 licensing basis to allow the dynamic effects associated with postulated pipe rupture of selected portions of the Unit 2 LPI [low-pressure injection]/Core Flood (CF) piping to be excluded from the design basis. The proposed design allowances for these selected portions of piping continue to allow the LPI system design to meet GDC [General Design Criterion] 4 requirements related to environmental and dynamic effects. The proposed LAR will continue to ensure that ONS [Oconee Nuclear Station] can meet design basis requirements associated with the LPI safety function. The addition of the crossover line will enhance the ability of the control room operator to mitigate the consequences of specific events for which LPI is credited. Therefore, the proposed LAR does not involve a significant increase in the probability or consequences of an accident previously evaluated.

(2) Create the possibility of a new or different kind of accident from any kind of accident previously evaluated;

The proposed LAR modifies the Unit 2 licensing basis to allow the dynamic effects associated with postulated pipe rupture of selected portions of the Unit 2 LPI/Core Flood (CF) piping to be excluded from the design basis. The proposed design allowances for these selected portions of piping continue to allow the LPI system design to meet GDC 4 requirements related to environmental and dynamic effects. The systems affected by the changes are used to mitigate the consequences of an accident that has already occurred. The proposed licensing basis change does not affect the mitigating function of these systems. Consequently, these changes do not alter the nature of events postulated in the Safety Analysis Report nor do they introduce any unique precursor mechanisms. Therefore, the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

(3) Involve a significant reduction in the margin of safety;

The proposed licensing basis change does not unfavorably affect any plant safety limits, set points, or design parameters. The change also do [SIC] not unfavorably affect the fuel, fuel cladding, RCS [reactor coolant system], or containment integrity. Therefore, the proposed licensing basis change, which adds new design allowances associated with the passive LPI cross connect modification, do [SIC] not involve a significant reduction in the margin of safety.