Braidwood Generating Station 35100 S. Rt. 53 Suite 84 Braceville, Il 60407



10 CFR 50.59(b)(2)

December 15, 2000 BW000114

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

> Braidwood Station, Units 1 and 2 Facility Operating License Nos. NPF-72 and NPF-77 NRC Docket Nos. STN 50-456 and STN 50-457

Subject: 10 CFR 50.59 Biennial Report

Pursuant to the requirements of 10 CFR 50.59, "Changes, Tests, and Experiments," paragraph (b)(2), Braidwood Station is providing the required biennial report for Facility Operating License Nos. NPF-72 and NPF-77. This report is being provided for the time period of June 19, 1998, through June 18, 2000, and consists of the descriptions and safety evaluation summaries for changes to the facility or procedures as described in the Updated Final Safety Analysis Report (UFSAR), and tests or experiments not described in the UFSAR.

Please direct any questions regarding this submittal to Mr. Terrence W. Simpkin, Regulatory Assurance Manager, at (815) 458-2801 extension 2980.

Sincerely,

Timothy J. Tulon Site Vice President Braidwood Station

cc: Regional Administrator – NRC Region III NRC Senior Resident Inspector – Braidwood Station

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Braidwood Station

10 CFR 50.59 Summary Report

June 19, 1998, through June 18, 2000

NRC Docket Nos. 50-456 and 50-457

License Nos. NPF-72 and NPF-77





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NUCLEAR WORK REQUEST (NWR)

980041277-01

DESCRIPTION

The purpose of this Nuclear Work Request was to mobilize all the equipment and work platforms required to support the construction activities for the Steam Generator Replacement Construction Opening Modification post-tensioning system work. This safety evaluation addressed the effect of the rigging activities on the Unit 1 Containment, Unit 1 Auxiliary Building, Unit 1 Main Steam Isolation Valve (MSIV) Rooms, Unit 1 MSIV vent stacks, Unit 1 Main Steam Tunnel and the Unit 1 Emergency Containment Escape Hatch. These are the important to safety SSCs which could be potentially impacted.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because rigging operations will be terminated during high wind conditions or a tornado watch and loads and equipment will either be placed in safe locations or secured such that they would not adversely impact important to safety SSCs. A rigging system failure caused by a load drop or seismic event has been analyzed. It has been determined that adverse effects to important to safety SSCs are precluded by geometry, scheduling rigging activities during a plant mode when the SSCs are not required to perform an important to safety function, or the use of tethers which meet NUREG-0612 single-failure-proof criteria for slings and interfacing lift points. When rigging system failure could impact an important to safety SSC, an impact analysis has been performed which demonstrates that the SSC is not adversely affected or that the failure in enveloped by another previously reviewed accident or malfunction.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there are no new or different events created as a result of the rigging activities because rigging operations will be terminated during high wind conditions or a tornado watch and loads and equipment will either be placed in safe locations or secured such that they would not adversely impact important to safety SSCs. A rigging system failure caused by a load drop or seismic event has been analyzed. It has been determined that adverse effects to important to safety SSCs are precluded by geometry, scheduling rigging activities during a plant mode when the SSCs are not required to perform an important to safety function, or the use of tethers which meet NUREG-0612 single-failure-proof criteria for slings and interfacing lift points. When rigging system failure could impact an important to safety SSC, an impact analysis has been performed which demonstrates that the SSC is not adversely affected or that the failure in enveloped by another previously reviewed accident or malfunction.
- 3. The margin of safety, as defined in the basis of the Technical Specification, is not reduced because the required functions of the Unit 1 Containment, Auxiliary Building, MSV rooms, MSV vent stacks, Main Steam Tunnel and Emergency Containment Escape Hatch are maintained.

UFSAR Draft Revision Package 7-239

DESCRIPTION

The purpose of this UFSAR Revision was to remove incorrect information; to add missing information to pertinent sections; and to clarify and improve the descriptions of various sections related to the plant Auxiliary Power Systems.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the functions of the Auxiliary Power equipment are not being changed. The descriptions of the plant design are consistent with the industry standards and Regulatory Guides which are referenced in the UFSAR.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the plant design is consistent with the design criteria which has been previously evaluated. No plant functions are being changed.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the functions for the related equipment are not affected by the UFSAR revision.

E20-1-96-269

DESCRIPTION

The purpose of this Engineering Request was to remove the Unit 1 Equipment Status Display (ESD) System equipment.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because failure of the affected ESD equipment to function is not an accident initiator for any of the accidents or transients evaluated in the SAR documents. The ESD System is not relied upon to remain functional following design basis events to ensure the integrity of the reactor coolant pressure boundary, the capability to shut down the reactor and maintain it in a safe shutdown condition, or prevent or mitigate the consequences of accidents that could result in potential offsite exposures comparable to the 10 CFR Part 100 guidelines.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because these changes do not 1) alter the function of any other system or component during any plant operating modes, 2) alter any initial conditions or assumptions used in the SAR documents or transient and accident analyses, or 3) create any new failure modes. Therefore, the proposed changes will not created the possibility of an accident or transient different than those previously evaluated in the SAR documents.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

9800922

DESCRIPTION

The purpose of this Engineering Request was to address the application of freeze seals on Essential Service Water (SX) supply and return lines to/from the cubicle cooler in the 1B Containment Spray (CS) Pump room. The freeze seals are required to isolate the SX supply and SX return header in order to permit maintenance and inspections activities on the internals of the cooler. Permanent isolation valves, ball type, are installed on the SX supply and return line. The freeze seals are needed as a contingency action if these isolation valves do not isolate the cooler properly.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because in the event of a freeze seal failure, contingency actions have been formulated to stop the leak. In any case, the resulting leak is significantly smaller than the design basis flood break flow. The door between 1A and 1B Containment Spray Pump rooms may need to be maintained open to permit exhaust of the nitrogen gas from the freeze area. The impact on the Auxiliary Building Ventilation system design airflows have been evaluated and have been found to be acceptable. In the event of an accident, the door would be closed to prevent any impact on meeting the negative pressure requirements for the Residual Heat Removal Pump rooms which border the CS Pump rooms.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. The piping affected by the added freeze plug has been evaluated and found acceptable by engineering judgment. Contingency actions have been formulated to isolate leakage in the unlikely event of a failed freeze plug. The SX System function is not altered. The freeze plug does not adversely affect plant equipment or systems as to create the possibility of an accident or a malfunction of a different type than those evaluated in the UFSAR.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced since the will CS Pump will be inoperable during this work and will be returned to operable status within the allowed outage time as specified in the Technical Specifications.

ER9800372

DESCRIPTION

The purpose of this Engineering Request was to evaluate the installation of freeze seal hardware and establishing a freeze seal on line 1SXA9A-6". This line is the Essential Service Water (SX) return from the 1B Auxiliary Feedwater (AF) Pump cubicle cooler and other auxiliaries. The return line from the AF Pumps to the SX System also ties in line 1SXA9A-6" and has been isolated with the installation of the freeze seal. This permitted the replacement of check valve 1SX194 located on the AF Pump return line to SX. Additionally, this permitted replacing valve 1SX178 located on the SX return line from the 1B AF cubicle cooler.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the addition of the freeze seal does not initiate any new accident scenarios nor does it modify the initiating event of any accident analyzed in the USFAR. The addition of the freeze seal does not affect the operation of the SX System. The AF Pumps are not required to be operable below Mode 3. The Braidwood Flood Analysis has also been reviewed and is not affected.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. The affected SX piping has been found to be acceptable with the added weight due to the freeze jacket hardware. Contingency actions have been formulated to isolate leakage flow out the valve's body, when the valve is disassembled, in the unlikely event of a failed freeze plug. The operation of the SX System is not altered.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

NUCLEAR WORK REQUEST (NWR)

980041277-01

DESCRIPTION

The purpose of this Nuclear Work Request was to mobilize equipment required to support construction activities for the SGRP Containment Opening modification. This work included rigging activities required to support the work and the construction of structures and equipment required for the modification.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the required safety-related function of the containment during and after the containment opening modification is maintained. The containment opening will have no adverse impact on the operation or function of any safety related Systems, Structures, or Components (SSCs) during the time when these SSCs are required to perform a safety related function. Rigging operations will be terminated during high wind conditions or a tornado watch and loads and equipment will either be placed in safe locations or secured such that they would not adversely impact important to safety SSCs. A rigging system failure caused by a load drop or seismic event has been analyzed.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there are no new or different events created as a result of constructing and restoring the containment opening. The plant will be in cold shutdown with the primary coolant system depressurized before tendons are detensioned. All fuel will be removed from Unit 1 and stored in the Spent Fuel Pool and all shared safety-related systems will be isolated from the Unit 1 Containment prior to removing containment concrete, rebar and the line plate. A rigging system failure caused by a load drop or seismic event has been analyzed. It has been determined that adverse effects to important to safety SSCs are precluded by geometry; scheduling rigging activities during a plant mode when the SSCs are not required to perform an important to safety function; or the use of tethers which meet NUREG-0612 single-failure-proof criteria for slings and interfacing lift points.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the containment opening construction and restoration activities have been evaluated to ensure the required functions of Primary Containment are maintained.

98-023

DESCRIPTION

The purpose of this Special Process Procedure was to introduce insignificant amounts of air inleakage through the main condenser vacuum pressure sensing lines. The air flow was to continuously purge the sensing lines improving the accuracy of the Condenser Vacuum indication.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the amount of air inleakage introduced will not affect the overall condenser vacuum.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because, a loss of condenser vacuum event is evaluated by the UFSAR. The amount of air introduced was insignificant and was well within the capacity of the Steam Jet Air Ejectors.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because no Technical Specifications are affected by this test. The turbine trip signal based on low condenser vacuum was not affected by this test.

DOCUMENT CHANGE REQUEST

980129

DESCRIPTION

The purpose of this Document Change Request (DCR) was to revise P&ID M-139 sheet 1 to show valve 2CC9437A as globe valve in lieu of a gate valve. The type of valve was incorrect on drawing.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. This change is a documentation change only to ensure that all documentation matches the as-designed and as-built configuration of the plant.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this change is a documentation change only to ensure that all documentation matches the as-built configuration of the plant. This change updates the P&ID to ensure that all documentation is consistent. This change does not create a possibility of an accident not previously evaluated.
- 3. The margin of safety, as defined in the basis of the Technical Specification, is not reduced because the function of the CC System has not changed. This change is a documentation change only to ensure that all documentation matches the as-built configuration of the plant.

SPP 98-053

DESCRIPTION

The purpose of this Special Process Procedure was to perform a Steam Generator (SG) thermal performance test in Mode 1 following SG replacement in refueling outage A1R07. This test was conducted at or near 100% power.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because data was collected using installed plant equipment and approved Station procedures. This test did not install any equipment, establish plant conditions or interface with plant operations or equipment in any manner.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new equipment was installed in the plant. Only existing plant equipment was used to collect data for this test.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

SPP 98-057

DESCRIPTION

The purpose of this Special Process Procedure was to record the normal broadband background noise frequency response of the Loose Parts Monitoring System (LPMS) at 0%, 20%, 50%, 75%, and 100% power levels. The test required temporary installation of non-intrusive test equipment. All test equipment was removed after the test, restoring the system to normal. This testing was required to meet the testing requirements of the Steam Generator Replacement Project.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because data collection equipment will be transparent to plant operation. The LPMS is operated in accordance with design features, cannot initiate any accidents analyzed in the UFSAR, and is not credited for the mitigation of any accidents or malfunctions of equipment.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the LPMS operation is not changed as a result of this test. All test equipment attachment was temporary, and the system was restored to normal after the test.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

SPP 98-137

DESCRIPTION

The purpose of this Special Process Procedure was to record the normal baseline frequency response of the loose parts monitoring (LPM) System in Mode 5 following the installation of replacement Steam Generators (RSGs) and the resultant modifications to the LPM System. This procedure impacted the RSGs near the LPM sensors with known masses and recorded the results at panel 1PA44J.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the test does not require plant operation different from an analyzed configuration. No modifications or adjustments of systems, structures, or components (SSCs) were made.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the plant was operated in a manner that has already been analyzed. No modifications or adjustments of SSCs were made.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

SPP 98-055

DESCRIPTION

The purpose of this Special Process Procedure was to verify selected indications were consistent with plant conditions and also collected steady-state baseline data at various power levels following replacement of the Unit 1 Steam Generations in refueling outage A1R07. This test was performed in modes 1 and 3.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this test used installed plant equipment. No new equipment was installed in the plant. The gathering of data cannot initiate an accident or malfunction.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this test used installed plant equipment for data collection. No new equipment was installed in the plant.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

SPP 98-042

DESCRIPTION

The purpose of this Special Process Procedure was to pressure test the containment to demonstrate operability following the closure of the temporary construction opening created in the containment structure for the replacement of the Unit 1 Steam Generators in refueling outage A1R07.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this test verified the containment structure met its design requirements and design function. This test was performed before the containment was required to be operable. The containment structure is not an initiator of any accident.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this test verified the containment structure met its design requirements and design functions. The structure was restored to its design following replacement of the Steam Generators. No new equipment was added to the plant.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

SPP 98-043

DESCRIPTION

The purpose of this Special Process Procedure was to measure the Steam Generator Blowdown System flow rate following the replacement of the Unit 1 Steam Generators in refueling outage A1R07.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this test used installed plant equipment. The equipment was operated in accordance with its design function.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this test used installed plant equipment. No new equipment was added to the plant.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications area based.

DESIGN CHANGE

E20-2-97-268-002

DESCRIPTION

The purpose of this Design Change was to replace the 2B, 2C, and 2D Reactor Coolant Pump (RCP) #1 Seal Leakoff Barton Model 752 flow transmitters with a Rosemount 1152 model. This change will increase the measured flow range from 0-6 gpm to 0-10 gpm.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the new transmitters have the same characteristics and performance capability as the original transmitters. They will perform the same function as the original devices.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the new transmitters will allow the reactor operator to observe the RCP seal leakoff flow over a larger range. The original range was 0-6 gpm, and the new range will be 0-10 gpm. This will allow Abnormal Operating Procedures for RCP's to be changed to allow an orderly plant shutdown in the event the #1 seal flow increases above 6 gpm and stays below 8 gpm. This guidance is provided in the Westinghouse Technical Bulletin ESBU-TB-93-01-R1 which states that the #1 seal leakoff can increase above 6 gpm as long as other temperature parameters are not violated. According to Westinghouse, this is within the capabilities of the RCP.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

SPP 98-048

DESCRIPTION

The purpose of this Special Process Procedure was to demonstrate the ability of the plant to sustain a 25% rapid load reduction following the replacement of the Unit 1 Steam Generators in refueling outage A1R07. This load reduction was performed at a rate of 200%/minute.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because installed plant equipment was used for this test. The installed plant equipment was operated per its design. The design of the plant bounded this activity.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because installed plant equipment was used for this test. The equipment was operated per its design. No new equipment was added to the plant.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications area based.

EXEMPT CHANGE

E20-2-98-214-001, 002

DESCRIPTION

The purpose of this Exempt Change was to eliminate the Emergency Diesel Generator (EDG) pneumatic and electrical vibration trip functions, which are currently bypassed in the emergency mode of operation. The existing trip function is being removed to eliminate nuisance tripping of the diesel generators during testing, based on the recommendations of the Cooper-Bessemer Owner's Group (CBOG) Technical Committee. Refer to "Technical Evaluation of Vibration Trip Switches Installed on Cooper-Bessemer Model KSV Emergency Diesel Generators", document MPR-1526, dated October 1994.

SAFETY EVALUATION SUMMARY

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. Based on MPR-1526, the net affect of removing the vibration trip function will be increased availability and reliability. This change has no affect during accidents because the high vibration trip function is bypassed. Since the vibration trip is always disabled in this mode, there is no operational effect, even when considering interactions with other SSCs. Considering operation of the EDGs in the test mode, MPR-1526 states that 98% of vibration trips on Cooper-Bessemer (CB) KSV engines were attributed to spurious events. Other events have been documented where the vibration trip did not function, resulting in major engine damage. It was concluded that the vibration trip serves no useful purpose on the EDG and that it could be removed with no additional safety risk.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new failure modes are introduced. MPR-1526 demonstrates that the current trip function is ineffective. Eliminating nuisance trips and alarms improve reliability and availability. Since the spectra during EDG operation is so broad and the vibration switch is difficult to adjust and maintain, its trip level is purposely set to a low sensitivity. The net effect is the removal of the vibration trip function in the test mode of operation. Since the EDG is only required in emergency mode and the vibration trip function is disabled in this mode, there will be no effect on failure modes of the EDG and associated SSCs during postulated accident conditions. Considering the above, removal of the vibration trip function has no additional effect on equipment failures.

The diesel generators and associated components are not directly involved with systems that can cause an accident. The diesel generators are used to mitigate the consequences of an accident. Additionally, the vibration trip is bypassed during accident scenarios. The removal of the vibration trip function will not increase the probability of an accident. The diesel generator is only used to mitigate the consequences of an accident. The availability and reliability of the diesel generator will be the same or better after the proposed modification for the following reasons. The transmitter is bypassed during accident scenarios. Per MPR-1526, the availability and reliability of the diesel generator should increase or stay the same. Availability increases because nuisance trips due to high vibration are eliminated. Reliability

increases because fewer restarts are required. Therefore the consequences of the accident will not be increased.

3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced. The change does not affect any parameters upon which Technical Specifications are based. Therefore, there is no reduction in the margin of safety.

DOCUMENT CHANGE REQUEST

970082

DESCRIPTION

The purpose of Document Change Request (DCR) 970082 was to revise P&ID M-69 Sheet 3 to reflect the correct size of outlet port size and tailpiece size associated with relief valve 0NT063. In addition, the Electronic Work Control System (EWCS) database is being revised to reflect these changes. P&ID M-69 Sheet 3 is UFSAR Figure 11.3-1 Sheet 3.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the DCR revises documents to reflect the as-built configuration in the plant and to that reflected in construction isometric drawings. No credit is taken for relief valve 0NT063 for accident mitigation purposes. The outlet port and tailpiece do not impact the pressure boundary of the system, nor do they affect containment pressure integrity.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no degradation of plant equipment or systems is involved with this DCR. No new failure mechanisms or modes are created as a result of the installation for the affected relief valve and tailpiece.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the DCR does not impact any parameters upon which the Technical Specifications are based. The affected relief valve does not impact any required Technical Specification function, nor does it impact any function of interfacing systems and components as to affect any defined margin of safety.

PROCEDURE REVISION

1BwOS 8.2.1.2.a-1, BwOP DC-1-111 1BwOS 8.2.1.2.b-1, BwOP DC-2-111 1BwOS 8.2.1.1-1, BwOP DC-5-111 BwOP DC-7-211, BwOP DC-7-111

DESCRIPTION

The purpose of these Procedure Revisions was to reflect the replacement of the existing safety related AT&T high specific gravity round cell batteries and racks with C&D LCUN-33 lead calcium batteries and associated racks. The battery chargers had their float/equalize voltage settings adjusted for the new batteries. Cross-tie amperage was increased from 100A to 200A. The batteries were installed under Modification M20-1-96-001.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the function of the safety related 125V DC System did not change. The design basis for the batteries still apply. The present battery room ventilation is still capable of meeting its design basis conditions for cooling/heating and byproduct gas removal for the room There is no affect of the battery replacement on equipment on equipment failures to the DC System or interfacing systems. This is an administrative change to have the procedures reflect the installed plant equipment.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. The new batteries replace presently installed batteries. The batteries operate in a similar manner as the present batteries do. A loss of offsite power would be caused by conditions outside the plant, or failures in the main power or auxiliary power systems. None of these systems are impacted by this modification. This is an administrative change to have the procedures reflect the installed plant equipment.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications area based.

PROCEDURE REVISION

1BwOS 8.2.1.2.a-2, BwOP DC-5-111 1BwOS 8.2.1.2.b-2, BwOP DC-1-112 1BwOS 8.2.1.1-1, BwOP DC-7-112 1BwOP DC-2-112, BwOP DC-5T-1-112 1BwOP DC-7-212, 2BwOS 8.2.1-1a 2BwOS 8.2.2-1a

DESCRIPTION

The purpose of these Procedure Revisions was to reflect the replacement of the existing safety related AT&T high specific gravity round cell batteries and racks with C&D LCUN-33 lead calcium batteries and associated racks. The battery chargers had their float/equalize voltage settings adjusted for the new batteries. Cross-tie amperage was increased from 100A to 200A. The batteries were installed under Modification M20-1-96-001.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the function of the safety related 125V DC System did not change. The design basis for the batteries still apply. The present battery room ventilation is still capable of meeting its design basis conditions for cooling/heating and byproduct gas removal for the room There is no affect of the battery replacement on equipment on equipment failures to the DC System or interfacing systems. This is an administrative change to have the procedures reflect the installed plant equipment.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. The new batteries replace presently installed batteries. The batteries operate in a similar manner as the present batteries do. A loss of offsite power would be caused by conditions outside the plant, or failures in the main power or auxiliary power systems. None of these systems are impacted by this modification. This is an administrative change to have the procedures reflect the installed plant equipment.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications area based.

ER9801196

DESCRIPTION

The purpose of Engineering Request (ER) 9801196 was to evaluate the acceptability of concurrently installing freeze seals on lines 0AB05AA-3" and 0AB05AB-3" to support repairs/replacement of Recycle Holdup Tank Outlet valves 0AB8563A and 0AB8563B under WR 970037029 and 960037375.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the failure of the freeze seal and the expected leakage or flooding in the Recycle Evaporator Feed Pump room is bounded by the Auxiliary Building Flooding Analysis. Leakage from freeze seal failure is unlikely since the differential pressure across the freeze plugs from the static head in the tank and cover gas is very small. The catastrophic failure of the affected lines is not likely since the lines are stainless steel and not susceptible to brittle fracture. Therefore, the freeze seal installation is bounded by both the flooding analysis and UFSAR Section 15.7.2 and 15.7.3 analyses for catastrophic failure of a Recycle Holdup Tank.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the installation of the freeze seals is consistent with industry recognized methodology. No degradation of plant equipment or systems is involved with the installation and no new failure mechanisms or modes are created as a result of the installation. The selected locations for the freeze seals and maintenance practices will limit any potential leakage from the valves opened for maintenance. This safety evaluation limits work on one valve at a time to limit the potential for leakage beyond that evaluated for.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the installation of the freeze seals do not impact any parameters upon which the Technical Specifications are based. The maintenance activity renders both Recycle Holdup Tanks incapable of having their contents processed, but maintains them available to receive effluents from normal or transient plant conditions. Therefore there is no impact on the operation or safety function of any interfacing systems.

DOCUMENT CHANGE REQUEST

980321

DESCRIPTION

The purpose of this Document Change Request (DCR) was to revise P&ID M-43 Sheet 1 to clarify/indicate Non-Essential Service Water (WS) Pump discharge header drain line, 0WSZ3A-12", discharges into 2C Circulating Water Pump forebay. Also, this DCR adds note 5 to M-43 Sheet 1 stating the portions of WS motor/pump cooling water lines and isolation valves were replaced with stainless steel per non-safety Technical Evaluation 95-0035-00.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the WS system is a non-safety related system and is designed to Safety Category II, Quality Group D criteria. Noting that portions of the WS motor/pump cooling water lines are stainless steel does not affect safety related equipment nor will it potentially jeopardize the performance of safety related equipment. Clarifying that the WS drain line, 0WSZ3A-12" discharges into the 2C Circulating Water Pump forebay is a documentation change only and does not affect the physical plant configuration. The WS system is not required to mitigate any UFSAR related accidents.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the WS system does not assist in the safe shutdown of the plant. There is no potential adverse impact on any SSCs important to safety as a result of the subject revision. Based on the above, this change does not adversely impact SSCs in a manner that could create the possibility of an accident or a malfunction of a type different from those evaluated in the UFSAR.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the change does not affect any parameter upon which the Technical Specifications are based. The WS System is not safety related and is not addressed in the Technical Specification.

PROCEDURE REVISION

1BwOSR 3.6.1.1-21

DESCRIPTION

The purpose of this Procedure Revision was to add two relief valves to the procedure to reflect the valves installed under Exempt Changes E20-1/2-97-267-001. These valves were installed to provide overpressure protection for containment penetrations.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the reliability of existing equipment is not degraded. The Chilled Water System is not required for accident mitigation. The potential of containment flooding at post Loss of Coolant Accident due to a stuck open relief valve is not significant since the amount of fluid added will be small. Further, the addition of the relief valve does not alter the function, but will increase the reliability of the containment isolation valves/piping during accident condition. This is an administrative change to have the procedure reflect actual plant conditions.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the relief valves do not adversely impact the Chilled Water (WO) System ability to supply water to the WO cooling coils during normal plant operation. Plant operation is not changed and no new failure modes are introduced. This is an administrative change to have the procedure reflect actual plant conditions.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

ER9800930

DESCRIPTION

The purpose of this Engineering Request was to evaluate the installation of freeze seals on the Essential Service Water (SX) inlet and outlet lines to/from the 1B Residual Heat Removal (RH) Pump room cubicle cooler. The freeze seals are required as a contingency in the event the existing isolation values do not isolate.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the freeze seals are installed per approved Station procedures which utilize industry recognized methodology to ensure system integrity is maintained during the maintenance activities. In the event of a failed freeze seal, the leakage past the closed isolation valves and past the freeze plug will be significantly less than the design basis flood inflow for the area (about 67 gpm). Contingency actions have been formulated to stop the leak as part of the work package.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because freeze seals are installed in accordance with approved Station procedures. These procedures utilize recognized methodology for the application of freeze seals on piping. The maintenance activities render the affected cubicle cooler inoperable and appropriate administrative controls are established to reflect the unavailability of this equipment. The installation of the freeze seal does not impact any other plant equipment other than the 1B RH Pump cubicle cooler. The failure of the freeze seal does not challenge the availability of any other plant equipment. Based on the evaluation performed, no components or systems will be degraded as to create the possibility of a new accident or malfunction different than those evaluated in the UFSAR.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameter upon which the Technical Specifications are based.

UFSAR Draft Revision Package 7-242

DESCRIPTION

The purpose of this UFSAR Revision was to revise the Section 7.4.1.4 references to valves 1/2CC9412A/B which incorrectly implied that the valves are on the inlet or supply side of the RH Heat Exchangers.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the function of the 1/2CC9412A/B valves is unchanged by this activity. The changes are only editorial in nature. No accident initiating conditions are affected by this activity, nor does this activity impact any equipment relied upon to mitigate the consequences of any accidents.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new failure mechanism or modes are created by this activity and no physical changes to the plant are involved.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

MODIFICATION TEST

E20-0-96-246 E20-0-95-252 E20-0-96-301-005

DESCRIPTION

The purpose of these Modification Tests involved operability testing of the Auxiliary Building Ventilation (VA) System main supply fan, 0VA01CA. This test verified proper installation of new forged blade assemblies, new inner-fairing cover plate, and modified screen fasteners.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because only existing approved Station procedures were used to test the system. The VA System will be tested in an acceptable lineup that is already addressed in the UFSAR and Technical Specifications.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this type of testing of the VA System does not have an impact on the events which initiate a LOCA or a radioactive release accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because testing the VA System in this configuration does not effect the Technical Specifications. This activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR Draft Revision Package 7-232

DESCRIPTION

The purpose of this UFSAR Revision was to correct various Component Cooling Water (CC) System configuration discrepancies including the discussion of the reactor support coolers, system pressure relief valves, and return line temperature indicators from the Reactor Coolant Pumps (RCPs).

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the function of the affected equipment is unchanged by this activity. The reactor support coolers are not connected to the CC System and perform no function and the other changes only involve the stated location of the equipment. No accident initiating conditions are affected by this activity, nor does this activity impact any equipment relied upon to mitigate the consequences of any accidents.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new failure mechanism or modes are created by this activity and no physical changes to the plant are involved.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which Technical Specifications are based.

UFSAR Draft Revision Package 7-219

DESCRIPTION

The purpose of this UFSAR Revision was to clarify the words in section 9.2.2.4.1 to reflect Component Cooling Water (CC) relief valve requirements in the event of a Reactor Coolant Pump thermal barrier break. The description of the function of relief valves (1/2CC9426A-D) in the CC thermal barrier cooling water return lines inside containment was revised to be consistent with the section 9.2.2.2.2 description of the same valves.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the function of the relief valves is unchanged by this activity. The changes only provide clarification of their functions to make the description consistent throughout the UFSAR. No accident initiating conditions are affected by this activity, nor does this activity impact any equipment relied upon to mitigate the consequences of any accidents.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new failure mechanism or modes are created by this activity and no physical changes to the plant are involved.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR Draft Revision Package 7-231

DESCRIPTION

The purpose of this UFSAR Revision was to revise the Section 9.4.3.4 description of the Boron Recycle System to include a statement that the Recycle Evaporators are no longer used for boric acid recovery.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the function of the affected equipment is unchanged by this activity. No accident initiating conditions are affected by this activity, nor does this activity impact any equipment relied upon to mitigate the consequences of any accidents.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new failure mechanism or modes are created by this activity and no physical changes to the plant are involved.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

NUCLEAR WORK REQUEST (NWR)

980041278-01

DESCRIPTION

The purpose of this Nuclear Work Request was to demobilize equipment required to support construction activities for the SGRP Containment Opening modification. This work included rigging activities required to support the work and the construction of structures and equipment required for the modification.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the required safety-related function of the containment during and after the containment opening modification is maintained. The containment opening will have no adverse impact on the operation or function of any safety related Systems, Structures, or Components (SSCs) during the time when these SSCs are required to perform a safety related function. Rigging operations will be terminated during high wind conditions or a tornado watch and loads and equipment will either be placed in safe locations or secured such that they would not adversely impact important to safety SSCs. A rigging system failure caused by a load drop or seismic event has been analyzed.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there are no new or different events created as a result of constructing and restoring the containment opening. The plant will be in cold shutdown with the primary coolant system depressurized before tendons are detensioned. All fuel will be removed from Unit 1 and stored in the Spent Fuel Pool and all shared safety-related systems will be isolated from the Unit 1 Containment prior to removing containment concrete, rebar and the line plate. A rigging system failure caused by a load drop or seismic event has been analyzed. It has been determined that adverse effects to important to safety SSCs are precluded by geometry; scheduling rigging activities during a plant mode when the SSCs are not required to perform an important to safety function; or the use of tethers which meet NUREG-0612 single-failure-proof criteria for slings and interfacing lift points.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the containment opening construction and restoration activities have been evaluated to ensure the required functions of Primary Containment are maintained.

UFSAR Draft Revision Package 7-244

DESCRIPTION

The purpose of this UFSAR Revision was to correct the auto restart times for the Component Cooling Water (CC) Pumps and the Essential Service Water (SX) Pumps, following a loss of offsite power.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this change only corrected the restart times listed in the UFSAR and the Safety Evaluation Report (SER) to agree with UFSAR Table 8.3.5 and the design documents. No physical plant changes were performed. Plant operations were not affected by this change. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated in the safety analysis report was not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this activity only corrected the CC Pumps and SX Pumps auto restart times, following a loss of offsite power as referenced in UFSAR Appendix B, Item 66, and Section 15.5, Item II.K.3.25 of the SER. There were no physical plant changes as a result of this documentation correction. No new malfunctions, accidents, or transient were introduced as a result of this change.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.
PROCEDURE REVISION

BwOP RD-E1

DESCRIPTION

The purpose of this Procedure Revision was to add new isolation points to the electrical lineup for the Control Rod Drive (RD) System due to installation of permanent power supplies for the RD spot coolers.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the function of the CRD cabinets and their components are not changed. This change is administrative in nature to ensure the procedures reflect actual plant conditions and equipment.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the function of the CRD System is not changed during normal and accident conditions. The spot coolers are added to increase the reliability of the Logic and Power Cabinets. The change is administrative in nature to ensure the procedures reflect actual plant conditions and equipment.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

PROCEDURE REVISION

BwRP 6110-17

DESCRIPTION

The purpose of this Procedure Revision was to provide radioactive effluent controls for temporary effluent pathways.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this procedure provides administrative sampling and analysis requirements to identify and quantify activity released via temporary effluent pathways. This procedure does not affect plant equipment or plant operations.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this procedure provides administrative sampling and analysis requirements to identify and quantify activity released via temporary effluent pathways. No physical changes were made to the plant.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this procedure provides instruction on the quantification of effluents via temporary release paths to ensure compliance with Technical Specification 6.8.4.e, Radioactive Effluent Controls Program. The parameters used to establish the limits are not changed, therefore, the margin of safety is not reduced.

UFSAR Draft Revision Package 7-217

DESCRIPTION

The purpose of this UFSAR Revision was to revise various Sections to reflect the fact that the Boron Concentration Measuring System (BCMS) has been disconnected at Byron Station. References are included to reflect that the BCMS system is still installed/connected at Braidwood Station, but is not used (abandoned).

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the function of the affected abandoned equipment at Braidwood Station is unchanged by this activity. This activity only reflects the removal or abandonment of the equipment. No accident initiating conditions are affected by this activity, nor does this activity impact any equipment relied upon to mitigate the consequences of any accidents.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new failure mechanism or modes are created by this activity. No physical changes to Braidwood Station are involved.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

EXEMPT CHANGE

E20-1/2-97-313

DESCRIPTION

The purpose of this Exempt Change was to replace the Loose Parts Monitoring System (LPMS) processing hardware with a newer upgraded hardware. The UFSAR was revised to remove the operating procedures described for the existing LPM equipment. The operating procedure steps being deleted were not required for describing the design and function of the system. The revised text is applicable to both old and new hardware.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the LPMS is for detecting the presence of loose parts within the Reactor Coolant System (RCS), but does not affect the probability of the presence of loose parts or initiation of any accidents or equipment malfunction. The LPMS is not credited for the mitigation of any accidents or equipment malfunctions. The detection and processing capabilities of the new hardware will improve the ability to identify and diagnose the presence of loose parts in the RCS.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the change does not alter the overall operation of the LPMS instrumentation.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR Draft Revision Package 7-116

DESCRIPTION

The purpose of this UFSAR Revision was to revise the original discussion of the setpoint at which Auxiliary Feedwater Pump suction switchover from the Condensate Storage Tank (CST) to Essential Service Water (SX) occurs to a functional description of the pressure switches on the suction of the Auxiliary Feedwater Pumps.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this activity incorporates a functional description of the pressure switches on the suction lines to the Auxiliary Feedwater Pumps. This discussion does not involve a change to the design or operation of the system and only reflects the as-built condition of the plant. This activity eliminates specific references to the setpoints associated with the pressure switches. This information is captured in other controlled documents and the elimination of this information from the UFSAR will not result in operation outside the design basis of the plant. Therefore, the probability of occurrence and the consequences of any accident associated with the affected system and components is not changed by the implementation of this activity.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the functional description of the pressure switches associated with the suction lines to the Auxiliary Feedwater Pumps does not introduce any new failure mechanism or modes, nor does it increase the possibility of creating an accident of malfunction different from those evaluated in the UFSAR by the implementation of this activity.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activty does not change any parameters upon which the Technical Specifications are based.

UFSAR Draft Revision Package 7-118

DESCRIPTION

The purpose of this UFSAR Revision was to revise a contradicting discussion of the ability of a Diesel Generator to operate without Essential Service Water supplied to the jacket water cooler in Section 8.3.1.2 to be consistent with the discussion in Section 9.2.1.2.3.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the function of the affected equipment is unchanged by this activity. No accident initiating conditions are affected by this activity, nor does this activity impact any equipment relied upon to mitigate the consequences of any accidents.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new failure mechanism or modes are created by this activity and no physical changes to the plant are involved.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR Draft Revision Package 7-117

DESCRIPTION

The purpose of this UFSAR Revision was to make various editorial changes to the description of the Essential Service Water system at Byron Station.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the function of the affected equipment is unchanged by this activity. No accident initiating conditions are affected by this activity, nor does this activity impact any equipment relied upon to mitigate the consequences of any accidents.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new failure mechanism or modes are created by this activity and no physical changes to the plant are involved.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR Draft Revision Package 7-119

DESCRIPTION

The purpose of this UFSAR Revision was to revise the discussion of concrete compressive strengths in Section 9.2.1.2.3 as applicable to Essential Service Water (SX) System interfaces with the Turbine Building structure. The information currently in Section 9.2.1.2.3 duplicates that in Section 3.7 and could possibly be misinterpreted.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the function of the affected equipment is unchanged by this activity. No accident initiating conditions are affected by this activity, nor does this activity impact any equipment relied upon to mitigate the consequences of any accidents.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new failure mechanism or modes are created by this activity and no physical changes to the plant are involved.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR Draft Revision Package 7-107

DESCRIPTION

The purpose of this UFSAR Revision was to correct Figure 5.1-2 in order to reflect the as-built configuration of the system and the plant. The change corrected the Figure to accurately illustrate the Pressurizer surge and spray piping connections to the Reactor Coolant System. The change also corrected the Figure to illustrate the deletion of the RTD bypass piping which had previously been approved in Design Change DCP #8602952.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the change was an update to a UFSAR Figure that made it consistent with plant asbuilt configuration. The change did not involve any changes to a SCC or a safety-related procedure described in the SAR.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the change was an update to a Figure contained in the UFSAR to reflect as-built configuration. The change did not involve any modification to an SCC.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR Draft Revision Package 7-105

DESCRIPTION

Parts Evaluation A-1997-5-0 replaces the Pressurizer Power Operated Relief Valve (PORV) block valve 17-4 precipitation hardened stem with XM-19 material in order to reduce the probability of brittle fracture of the stem at temperatures at or above 600 degrees F. The new material is not subject to stress corrosion cracking at high temperatures. The purpose of this UFSAR Revision was to update the UFSAR to reflect this new information.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the PORV block valve will continue to perform its intended function during all accident scenarios.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this parts evaluation/change does not adversely impact UFSAR accident related systems, structures, and components (SSCs). The replacement stem material does not introduce any adverse interactions between any SSCs. The replacement stem material meets the requirements of the PORV block valve application.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

DOCUMENT CHANGE REQUEST

980332

DESCRIPTION

The purpose of this Document Change Request (DCR) was to revise P&ID M-39 Sheet 1, P&ID M-124 Sheet 1, C&ID M-2039 Sheet 8, and C&ID M-2124 Sheet 7 to reflect the as-built configuration of heat tracing on the 3/4" and 1/2" sensing lines to the Condensate Storage Tank (CST) level transmitters (1/2LT-CD051). In addition, the Electronic Work Control System (EWCS) database is being revised to reflect these changes. P&IDs M-39 Sheet 1 and M-124 Sheet 1 are also UFSAR Figures 9.2-15 Sheets 1 & 2.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the DCR revises documents to reflect the as-built configuration in the plant. The CSTs and their level transmitters do not initiate any evaluated accidents.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no degradation of plant equipment or systems is involved with this DCR. No new failure mechanisms or modes are created as a result of the change which correctly indicates the heat tracing and insulation configuration on the CST level sensing lines.
- 3. The margin of safety, as defined in the Bases of the Technical Specification, is not reduced because the DCR does not impact any parameters upon which the Technical Specifications are based. The changes reflected in the affected documents do not impact the indicating function of the level transmitters and therefore have no impact on maintaining Technical Specification required CST levels.

UFSAR Draft Revision Package 7-129

DESCRIPTION

The purpose of this UFSAR Revision was to revise Sections 7.3.1.1.10.1 and 7.3.1.1.10.2.2 to reflect the proper temperature requirements for the Diesel Oil Storage Tank Rooms and to make these sections agree with Table 3.11-2, "Plant Environmental Conditions" and Technical Specification 3/4.7.12.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this activity is only intended to ensure consistency between the UFSAR text, tables and the Technical Specifications.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this change does not enhance the possibility for an accident or malfunction since the equipment in question is suitable for the normal postulated conditions and abnormal/accident conditions are not postulated for the environmental zone in which this equipment is physically located.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the UFSAR changes were made to agree with the Technical Specifications.

UFSAR Draft Revision Package 7-034

DESCRIPTION

The purpose of this UFSAR Revision was to revise Sections 4, 6, 9 and 15 to incorporate increased peaking factors for Units 1 and 2. The increased peaking factors resulted from the reactor core reload design for Unit 1 Cycle 7.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the design meet all key safety parameter limits and ensures that all pertinent licensing basis acceptance criteria are met. The demonstrated adherence to these standards and criteria precludes new risks to components and systems that could introduce a new type of accident. All key safety parameters are within the assumptions for the design basis acceptance.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the design meets all key safety parameter limits and ensures that all pertinent licensing basis acceptance criteria are met. The demonstrated adherence to these standards and criteria precludes new risks to components and systems that could introduce a new type of accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the reload design has been analyzed with NRC approved methodologies and shown to operate within safety analysis acceptance limits.

UFSAR Draft Revision Package 6-073

DESCRIPTION

The purpose of this UFSAR Revision was to allow the opening of both Radwaste Building truck bay roll-up doors to allow trucks ingress and egress.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the probability/consequences of an accident are not affected since the Radwaste Building, its ventilation system, and solid radwaste storage and handling do not initiate or alter the initial conditions of any accident.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the radwaste, its ventilation system, and solid radwaste storage and handling do not initiate or alter the initial conditions of any accident. No equipment is being added to the plant. The only plant equipment affected by this activity are the Radwaste Building truck bay roller-up doors.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

SETPOINT CHANGE

SSCR 97-043 SSCR 97-044 SSCR 97-045 SSCR 97-046

DESCRIPTION

The purpose of these Setpoint Changes (SSCR) was the revise the Unit 1 and Unit 2 Containment Spray Additive Tank (CSAT) Lo-2 Level Alarm setpoints. These changes were required based on the replacement of the Steam Generators on Unit 1 and the evaluation of instrument uncertainty based on ComEd methodology.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the CSAT is not an accident initiator. This change ensures the proper amount of Sodium Hydroxide is added to Containment Spray after an accident to ensure the pH in containment is correct. The affected components are operated per their design.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new equipment was added to the plant. The affected components are operated per their design. This ensures the proper pH conditions in containment following an accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this change is ensuring the proper volume of Sodium Hydroxide is added to Containment Spray to ensure the proper pH value in containment is maintained.

SETPOINT CHANGE

SSCR 97-014

DESCRIPTION

The purpose of this Setpoint Change (SSCR) was to revise various setpoints in the Steam Generator Water Level Control (SGWLC) System on Unit 1. The changes were needed due to the replacement of the unit 1 Steam Generators (SG) during refueling outage A1R07.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because these changes ensured the SGs are efficiently operated and the water mass in the SGs are within the bounds of the accident analysis. This ensured all design basis accidents were bounded.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new equipment was installed. These changes ensure the water mass in the SGs are within the bounds of the accident analysis.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because these setpoints ensure the SG water level conditions are within the bounds assumed in the accident analyses. This ensures they are within the values assumed in the Technical Specifications.

UFSAR Draft Revision Package 7-055

DESCRIPTION

The purpose of this UFSAR Revision was to revise the discussion on the HEPA filters in the containment charcoal recirculation units.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the filtration unit does not have any impact on the events which initiate an accident and it is not required to mitigate an accident. The replacement filters are seismically tested to ensure that the filters will not affect other Category 1 (seismic) equipment.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the replacement filter is manufactured to the same standards as the original filter. The seismic requirements are tested and verified. The differential pressure is within the band of the original filter. Fire loading was verified to remain within the original analysis. The replacement removes hydrogen generating aluminum from containment.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

PROCEDURE REVISION

1BwOA SEC-8

DESCRIPTION

The purpose of this Procedure Revision is to revise procedure 1BwOA SEC-8 to change the Steam Generator (SG) level setpoints, 1FW039 and 1FW041 valve names, and remove the Main Feedwater (FW) isolation bypass valves due to the SG replacement modifications on Unit 1.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the installation of the new SGs, associated piping, and instruments was performed in accordance with design standards, quality control, and quality assurance measures. Although different from the original plant design, the installations meet all of the original design requirements. Differences between the original SGs and the new SGs require changes to setpoints to ensure the mass inside of the SGs meets the requirements of the accident analyzes in the SAR. The new setpoints and installations meet or exceed the original design requirements. Therefore, the probability of occurrence or the consequences of an accident or malfunction is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the design of the Auxiliary Feedwater (AF), Main Feedwater (FW), and Main Steam (MS) Systems and auxiliary systems has not changed. The installation of the new components is controlled by quality assurance programs and the active components are not altered by the modifications. Therefore, no new failure modes are introduced.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because these activities do not affect any parameters upon which the Technical Specifications are based.

UFSAR Draft Revision Package 7-250

DESCRIPTION

The purpose of this UFSAR Revision was to change the RCS dissolved hydrogen limits and provide greater flexibility of VCT hydrogen overpressure normal operating limits. The UFSAR currently states that the reactor coolant chemistry program controls the dissolved hydrogen concentration within the range of 25 - 35 cc/kg while operating in mode 1. This range will be modified to allow RCS dissolved hydrogen to operate between 25 - 50 cc/kg. The UFSAR also describes that the current VCT hydrogen overpressure is controlled between 15 and 20 psig, or approximately 20 psig. This range would be modified to allow VCT hydrogen overpressure to be increased to approximately 30 psig during situations that may require higher RCS hydrogen concentrations. Such situations may include increasing RCS hydrogen just prior to a planned shutdown when core off load is anticipated and just prior to planned maintenance on the Hydrogen supply system where the Hydrogen supply to the VCT is expected to be interrupted for short periods during normal plant operations.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the proposed activity of increasing RCS dissolved hydrogen to 50 cc/kg was previously evaluated in UFSAR Section 6.2.5.3.1.2.
- The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed activity has been previously evaluated and is part of the original Westinghouse primary chemistry criteria and specifications during power operations.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the original Westinghouse design and chemistry specifications are in agreement with the proposed changes. The change does not affect any parameter or equipment addressed in the Technical Specifications.

DOCUMENT CHANGE REQUEST

980334

DESCRIPTION

The purpose of this Document Change Request (DCR) was to isolate plant systems from the non-utilized portions of the Volume Reduction (VR) System.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the VR System is not assumed to function in an accident or transient and does not support any equipment that is assumed to function in an accident or transient.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because a malfunction of the VR System is not an initiator in any accident. The proposed change will isolate plant support systems from a system that is not used, nor required to process plant radiological waste. This change has no effect on areas outside of radwaste processing. There is no adverse affect to plant support systems or functions to create the possibility of an accident different form those previously evaluated.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

FIRE PROTECTION REPORT (FPR) REVISION

FDRP 18-062

DESCRIPTION

The purpose of this FPR Draft Revision Package (FDRP) was to revise and clarify sections of the UFSAR and Fire Protection Report that addressed Diesel Oil (DO) lines routed through opposite train rooms. The text is being revised to clarify where this unprotected DO piping from the train credited for safe shutdown is present in a fire zone, exposure to a fire in that zone does not affect the operability of the credited Diesel Generator (DG) and Auxiliary Feedwater (AF) train credited for safe shutdown. The text is also being revised to clarify that where fire wrap has been added to DO lines, it was done as a conservative measure. This change is a documentation change only.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. Analysis has been performed to show that a fire in a fire zone, where unprotected DO piping from the train credited for safe shutdown is present, does not affect the operability of the credited DG or AF train due to the heating of the oil in DO lines. The proposed activity is a documentation change only to clarify the wording in the UFSAR and FPR.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this change is a documentation change only to clarify where this unprotected DO piping from the train credited for safe shutdown is present in a fire zone, exposure to a fire in that zone does not affect the operability of the credited DG and AF train credited for safe shutdown.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the function of the DO, DG and AF Systems has not changed. This change does not affect any parameters upon which the Technical Specifications are based.

980041276-01

DESCRIPTION

The purpose of this Nuclear Work Request was to re-grease the post tensioning system tendons as part of the SGRP Containment Opening modification.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this activity is restoring the containment tendons to the as-designed condition after the Steam Generator replacement. The containment structure is not an initiator of any accident.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the containment structure will still function as designed. This activity is restoring the tendons to the as-designed condition.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

970135176

DESCRIPTION

The purpose of this Nuclear Work Request was to detension and remove the post tensioning system tendons removed and/or detensioned as part of the SGRP Containment Opening modification.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this activity is removing tendons to allow a hole to be cut into containment. This activity was performed in a mode where containment integrity was not required. The containment structure was restored to as-designed conditions following Steam Generator replacement.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created since this activity was performed in a mode where containment integrity is not required. The containment structure was restored to as-designed conditions following Steam Generator replacement.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

970135176-02

DESCRIPTION

The purpose of this Nuclear Work Request was to install and retension the post tensioning system tendons removed and/or detensioned as part of the SGRP Containment Opening modification.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this activity is restoring the containment tendons to the as-designed condition after the Steam Generator replacement. The containment structure is not an initiator of any accident.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the containment structure will still function as designed. This activity is restoring the tendons to the as-designed condition.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

ENGINEERING REQUEST

9801052

DESCRIPTION

The purpose of this Engineering Request was to address the removal of the manual gear operator from valve 0CC9471B to perform maintenance on the operator. This valve is the inlet isolation to the Unit 0 Component Cooling (CC) heat exchanger.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. An engineering evaluation has concluded that the valve will remain open under postulated conditions, including seismic, and thus will retain its safety related function and the Unit 0 CC heat exchanger will remain operable for all postulated accidents.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. The removal of the gear operator for valve 0CC9471B will not affect the operability of the valve. The valve will remain open thus maintaining CC flow through the Unit 0 CC heat exchanger and maintaining the operability of the Unit 0 CC heat exchanger and maintaining the operability of the Unit 0 CC heat exchanger and maintaining the operability of the Unit 0 CC heat exchanger. Additionally, the affected piping subsystem, by Engineering Judgment, will remain seismically qualified upon removal of the operator's weight. The operation of the CC System will remain as described in the UFSAR.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the valve will still perform its safety function. The CC System will still be able to perform its function as described in the Technical Specifications.

970007959

DESCRIPTION

The purpose of this Nuclear Work Request was to clean the 1B Containment Spray (CS) cubicle cooler. To perform this work, doors D-245 and D-283 were required to be propped open to allow routing of hoses through the 1A/1B CS Pump rooms. These doors are considered part of the ventilation boundary.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the Auxiliary Building will be required to maintain at least -0.3 inches of water during this work. This will satisfy the requirement for the ECCS Pump rooms and CS rooms to maintain a minimum of -0.25 inches of water with respect to outside atmosphere. Administrative controls are in place to ensure all environmental qualification, alara, and flooding requirements are met and remain bounded by the existing analysis.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this action does not have an impact on the events which initiate a LOCA or a radioactive release accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because all Technical Specification requirements were met. All differential pressure requirements were met during this activity.

EXEMPT CHANGE

E20-1/2-98-245

DESCRIPTION

The purpose of this Exempt Change was for the third phase of the Plant Process Computer (PPC) improvement project. Phase III of the project installs improved graphic capabilities for the PPC and implements the Human-Machine Interface upgrades by replacing the PPC graphics system hardware and Opcon workstations. The existing PPC display features, including the Safety Parameter Display System, will remain unchanged with the new system and additional graphic features are added to improve operator display of PPC information.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the Plant Process Computer is used to collect and process data from plant instrumentation, which can be accessed and displayed for use by the operators. The PPC does not provide any direct control functions and is not associated with the initiation of any accidents or equipment malfunctions. The existing data and displays provided for use by operators to assess plant conditions will be maintained. The change does not affect the collection and processing of data used by the operators. Therefore, there is not change in the PPC information for operator use in responding to an accident or equipment malfunction.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the change does not add any control functions to the PPC. The Human-Machine Interface improves the use of the PPC by the operators, but the change does not provide any plant control interface via the PPC.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

DOCUMENT CHANGE REQUEST

980399

DESCRIPTION

The purpose of this Document Change Request (DCR) was to indicate the size of lines 1MS81EA and 2MS81EA as ½ inch diameter. The same fix is made electronically in the Electronic Work Control System (EWCS). EWCS is also revised to show the correct size of valves 1MS152 and 2MS152. Additional changes for lines 1/2MS81EA are made in EWCS to indicate that these lines are not related to Containment isolation or to the Technical Specifications.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the addressed activities will not have any impact on the initiating events of any accidents analyzed in the UFSAR. The probability of any accident is not increased. The implementation of DCR #980339 does not result in any physical work. The smaller size for the sensing line for instruments 1/2PT-MS003 does not affect the operation of the instruments. No changes result to any initiating conditions for any accidents analyzed in the UFSAR.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because DCR #980339 will not make any physical changes to plant equipment nor will it make changes to system parameters or plant equipment operating conditions.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the parameters upon which the margin of safety of any Technical Specification is based are not affected.

EXEMPT CHANGE

E20-1-97-254

DESCRIPTION

The purpose of this Exempt Change was to install a hydrolase tap line including an isolation valve on line 1CV01E-3" (supply line from the Chemical and Volume Control (CV) System Regenerative Heat Exchanger to the Letdown Heat Exchanger). The tap was installed at a 45-degree downward angle to be used as both a hydrolase port and as a drain.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the analysis of the subject accident assumes a CV line break outside the containment, upstream of 1CV8152 that releases primary coolant at a rate that can be made up by one Centrifugal Charging Ppump. The hydrolase tap was installed downstream of the 1CV8152 valve. Based on calculation EMD-049638 Addendum E, no additional high energy line break points are postulated and the CVCS pressure boundary remains qualified to ASME Section III Class B requirements. There are no malfunctions of equipment important to safety associated with the addition of the hydrolase tap. The hydrolase tap will not prevent any equipment important to safety from performing its intended function during a UFSAR accident. Therefore, there is no increase in the consequences of a malfunction of equipment important to safety.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the hydrolase tap installed downstream of the outside containment isolation valve 1CV8152 is a qualified Class B pressure boundary. Therefore, it does not compromise the integrity of the CV System. The tap is intended to provide a path to hydrolase and drain the 3" CV line during refueling operations and is not used during normal operations. Based on the above, this installation does not adversely impact SSCs in a manner that could create the possibility of an accident or a malfunction of a type different from those evaluated in the UFSAR.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

TEMPORARY ALTERATION

98-1-012

DESCRIPTION

The purpose of this Temporary Alteration was to remove an existing Unit 1 System Auxiliary Transformer (SAT) 142-2 deluge system pipe support and provides a temporary support in its place at the same location. This temporary support is attached to the non-segregated bus duct support steel framing.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because when the existing deluge system support was removed, it replaced a temporary support at the same location. Therefore the piping system support configuration was unchanged. The temporary support was attached to the non-segregated bus duct support steel framing. The support steel was structurally adequate with the additional load due to the temporary support. This Temporary Alteration had no adverse impact on the operation or function of any safety related systems, structures, or components during the time when these SSCs are required to perform a safety related function.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there were no new or different events created as a result of this Temporary Alteration. The deluge system piping support configuration was unchanged and the non-segregated bus duct support steel framing was structurally adequate with the additional load due to the temporary support. Therefore the deluge system and the bus duct support steel functioned as designed.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the deluge system piping support configuration was unchanged and the non-segregated bus duct support steel framing was structurally adequate with the additional load due to the temporary support. Therefore, the deluge system and the bus duct support steel functioned as designed. The parameters upon which the margin of safety of any Technical Specification is based are not affected.

MODIFICATION

9600025

DESCRIPTION

The purpose of this Document Change was to create a temporary construction opening with the approximate dimensions of 10 feet wide by 22 feet high in the Unit 1 Containment wall for the steam generator removal and replacement. Removal activities include detensioning and removal of selected tendons; removal of concrete, reinforcing steel, and tendon ducts; and liner plate removal. Restoration activities include re-installing the removed portion of the liner plate, installing replacement reinforcing steel and tendon ducts, replacing the containment opening concrete, reinstalling removed tendons, and re-tensioning tendons affected by the Containment opening. This safety evaluation includes the design and analysis of Containment during and after the Steam Generator Replacement Outage and the construction activities associated with creating and restoring the opening.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the required safety-related function of the Containment during and after the Containment opening modification is maintained. The integrity of containment will be restored per design. The containment opening will have no adverse impact on the operation of function of any safety related systems, structures, or components during the time when these SSCs are required to perform a safety related function.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there are no new or different events created as a result of constructing and restoring the Containment opening. The Containment structural integrity will be maintained with two (2) horizontal (hoop) tendons removed during plant operation. The remaining tendons within the scope of the modification will be detensioned during mode 5, 6 or defueled with the Reactor Coolant System depressurized. All tendons will be retensioned prior to entry into mode 4 after the outage. All fuel will be removed from Unit 1 and stored in the Spent Fuel Pool and shared safety-related systems will be isolated (Component Cooling Water System) from the Unit 1 Containment or be maintained in an isolatable configuration (Essential Service Water System) prior to removing containment concrete, reinforcing steel and the liner plate. Unit 1 refueling activities and restoration of the systems isolated from Unit 1 Containment will not begin until the liner plate, reinforcing steel and containment concrete have been reinstalled and containment concrete has reached a strength of 3500 psi.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the Containment opening construction and restoration activities have been evaluated to ensure the ultimate capacity of the Containment is not affected by the temporary changes to the Containment shell structure. The integrity of containment will be restored per design.

ENGINEERING REQUEST

ER9800975

DESCRIPTION

The purpose of this Engineering Request was to evaluate the acceptability of installing a freeze seal on line 2WM19A-3" to support the repair or replacement of valve 2WM210A which is a 2" demineralized water hose station isolation valve in the Fuel Handling Building.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the failure of the freeze seal and the resulting leakage and dilution in spent fuel pool boron concentration is <u>not</u> a credible event which would result in a k_{eff} of >0.95. This type of event was specifically evaluated in support of Braidwood Technical Specification Amendment #86 which takes credit for the soluble boron concentration in the fuel pool to preclude criticality under all postulated fuel handling accidents and fuel rack loadings.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the installation of the freeze seals is consistent with industry recognized methodology. No degradation of plant equipment or systems is involved with the installation and no new failure mechanisms or modes are created as a result of the installation.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the potential catastrophic failure of the freeze seal and subsequent dilution of fuel pool boron concentration is not considered a credible event. The restrictions provided in the safety evaluation, no fuel handling in progress and neither unit in Mode 6, precludes any possible dilution event which may result in boron concentration being less than 550 ppm. A boron concentration of 550 ppm ensures that k_{eff} remains <0.95, which bounds the existing analyses of fuel handling accidents.</p>

MODIFICATION

M20-1-92-007 M20-2-92-007

DESCRIPTION

The purpose of these Modifications was to discuss the change in the Unit 1 and the Unit 2 Safety Related battery discharge duty cycles from 240 minutes to 60 minutes. The NRC granted this change to ComEd in 1994, in relation to the installation of the AT&T round cell batteries. The duty cycle was revised to reflect a more accurate load profile for the Safety Related batteries.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because a loss of off-site power would be caused by conditions outside the plant, or failures in the Main Power or Auxiliary Power Systems. Reliable DC power will still be available to power its required connected systems. The one hour duty cycle for the battery covers a period greater than that identified in the Station Blackout (SBO) evaluation. Since reliable DC power will be available, the plant's ability to limit off-site dose rates is not affected. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety previously evaluated is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the change in the duty cycle for the battery is well within the design basis of the plant and related systems. The battery portion of the DC System is intended to provide power during a period where AC power is not available to the DC battery chargers. The overall operation of both the batteries and the DC System and the plant as a whole will be essentially unchanged by the UFSAR clarification of the one hour duty cycle. Thus, the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not created as a result of this change.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the batteries are sized to support the duration defined by the SBO analysis for loss of AC power to the battery charger. Crosstie capabilities also exist within the DC Systems to allow for the other Unit's divisional battery bank to supply DC power in the event that a charger is taken offline. Therefore the margin of safety is not reduced.

SETPOINT CHANGE

1/2 RE-AR011 1/2 RE-AR012

DESCRIPTION

The purpose of this activity was to comply with Technical Specification Table 3.3-6, ITS 3.3.6, and TRM 3.3.p by changing the alert and high alarm setpoints on the AR011 and AR012 (Containment Fuel Handling Incident Area Radiation Monitors). The area radiation monitor setpoints are to be set to detect a submersion dose rate of 10 mR/hr above background. During an operating cycle, background levels at the monitor increase about 1 mR/hr per month.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the setpoint changes were digital in nature and operate exactly as before the setpoint change.
- The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the activity changes the setpoints of the monitors only. The monitors do not cause or create an accident and will still function as designed during an accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the monitors were able to detect the 10 mR/hr submersion dose rate inside Containment and isolate the Containment during a Containment purge. The setpoints of the monitors are still complying with the Technical Specifications.

UFSAR Draft Revision Package (DRP) 7-146

DESCRIPTION

The purpose of this UFSAR Revision was to revise the UFSAR Section 10.4.7.2 description of the operation of the Main and Startup Feedwater Pumps. This DRP primarily addressed the low power operation of the feedwater system and the transition between Main and Startup Feedwater Pumps during startup and shutdown.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the technical changes implemented in DRP 7-146 eliminated an inaccurate discussion of the Startup Feedwater Pumps and promoted a pump operating configuration at low power that improved overall feedwater system performance and reliability.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new failure modes or mechanisms were introduced by the implementation of DRP 7-146. The discussion of feewater pump operation at low power does not create the potential for operator errors that would induce a transient.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the change did not affect any parameters upon which Technical Specifications are based.

SETPOINT CHANGE

SSCR 97-016

DESCRIPTION

The purpose of this Safety Evaluation was the result of the replacement of the steam generators in Unit 1. The expected feedwater header-to-main-steam-header differential pressures required change. As a result of this change, both Westinghouse and Framatome Technologies have provided recommendations for the revision of feedwater pump speed controller gain and lag times. These recommendations have been updated to incorporate the results of startup testing at Byron Station in test SPP 97-052. This change implements those recommendations and test results.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the failure of the feedwater pump speed control system is bounded by the failure (open) of a single feedwater control valve, and no new or different types of equipment will be added by this change. Existing equipment will be adjusted to different calibration values.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the change does not install any new equipment or alter any existing equipment such that it operates beyond its intended range of operation.
- 3. The margin of safety, as defined in the basis of the Technical Specification, is not reduced because the change does not affect any parameters upon which the Technical Specifications are based.
DOCUMENT CHANGE REQUEST

DCR 970272

DESCRIPTION

The purpose of this Document Change Request (DCR) was to delete the reference of Auxiliary Building Equipment Drain System from components on the Boric Acid System from prints M65-5A and M65-5B and UFSAR Figures 9.3-5 sheet 8 and 9 of 12. The boric acid components that referenced "Auxiliary Building Equipment Drain System" did not directly drain into the "Auxiliary Building Equipment Drain System". The boric acid components that reference the "Auxiliary Building Equipment Drain System" are actually drained into a sump. The sump had to have a submersible pump in order for it to be drained. The removal of this reference would eliminate any confusion when draining this system for maintenance.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased by removing "Auxiliary Building Equipment Drain System" from the boric acid components that referenced it. There would not be any changes to the way the components are drained currently. Each component that referenced "Auxiliary Building Equipment Drain System" actually drains into a sump where a submersible pump has to be installed to drain the contents.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created by the deletion of the reference "Auxiliary Building Equipment Drain System". This deletion would not affect the current practices on how these components are drained for maintenance activities. This change reflects how the plant is designed and operated. This change can not create an accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the function of the Boric Acid System is not changed by the removal of the referenced "Auxiliary Building Equipment Drain System" form the boric acid components that referenced it. This change does not affect any parameters upon which the Technical Specifications are based.

NUCLEAR WORK REQUEST (NWR)

980028560

DESCRIPTION

The purpose of this Safety Evaluation was the use of a device to sever the T-handle portion of the mounting brackets for 0FC02MA/B and drill a 3/16" hole as a siphon break on the top of the underwater horizontal portion of line 0FC29AB-2. The device provides the mechanism to drive an electrode through a work piece at a specified rate. It also provides an environment through which a flush medium (Primary Water – PW) is passed to remove the debris particles from the work area. The T-handles will be severed by passing a thin/flat graphite electrode through them. The siphon break will be created using a 3/16" round graphite electrode. This work is required for the installation of modification E20-0-96-272.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the EDM cutting process cannot initiate a Fuel Handling Accident. The proposed activity will not affect any equipment important to safety. The Fuel Pool Cooling (FC) System will not be impacted as a result of the proposed activity. The system will continue to have the capability to remove decay heat from the spent fuel pool. The FC System will continue to operate as designed to remove decay heat from the spent fuel pool and provide adequate shielding in the advent of a Fuel Handling Accident. Therefore, the probability or consequences of a malfunction of equipment important to safety do not increase.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed activity does not adversely impact any systems or functions so as to create the possibility of an accident or malfunction of a type different from those evaluated in the SAR. Normal plant operations are not affected. No new equipment failure modes are introduced as a result of the proposed activity. The proposed activity does not affect the initial conditions of any accident, and does not change any accident, and does not change any Technical Specifications.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the FC System will function as designed to limit radiological dose following a Fuel Handling Accident. The minimum water depth of 23 feet between the top of the damaged fuel rods and the pool surface will be maintained. Therefore, the margin of safety as defined in the basis for any Technical Specification is not reduced.

SPP-98-049

DESCRIPTION

The purpose of this Special Process Procedure (SPP) was to demonstrate the ability of the plant to sustain a 10% rapid load reduction following the installation of the Unit 1 replacement Steam Generators. The plant was in a steady state condition with major control systems in automatic mode and reactor power greater than 30%. A rapid load reduction was initiated using the Digital Electro-hydraulic Controls (DEHC) (turbine controls) of 10% of rated capacity and a rate of 200%/min. The plant response was monitored with permanent plant equipment and temporary chart recorders. The plant stabilized after the reduction at the lower power level.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because none of the analyzed accidents are effected by this procedure. The test performs designed plant operations and does not alter any plant SSC. The test demonstrates the ability of the plant to withstand a rapid load reduction within design parameters. If the plant was not able to perform as designed, the plant would have tripped. A plant trip is bounded by the SAR analyzed accidents.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the test incorporates permanently installed plant equipment and temporary recorders to monitor plant responses. If the temporary recorders fail, plant control systems may be affected, but not any of the protection systems. However, such failures are bounded by the SAR analyzed accidents.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

DOCUMENT CHANGE REQUEST

DCR 980349

DESCRIPTION

The purpose of this Document Change Request (DCR) was to correct a labeling error on Auxiliary Feedwater (AF) P&IDs M-37 and M-122 (UFSAR Figure 10.4-2). The drawings/figure label flow measuring orifice (2)1FE-AF016 as "FLOW LIMITING ORIFICE (TYPICAL)". This is incorrect. EPNs (2)1FE-AF011 thru 18 are flow measuring orifices which are used for control and indication. DCR 980349 moves the label "FLOW LIMITING ORIFICE (TYPICAL)" from flow measuring orifice (2)1FE-AF016 to flow limiting orifice (2)1AF04MG on drawing M-37 and M-122.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased by implementing DCR 980349. There is no change being made to the configuration of the plant nor the intended design function of the AF system/components. The probability of the remaining accidents are tied to the initiating equipment such as steam piping, feed piping, steam generator tubes, RCS pressure boundary components, etc., none of which are affected by this drawing change. The AF system will function as described in the text of UFSAR Section 10.4.9 and Chapter 15 Accident Analysis.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because it does not result in a physical change to the AF system or its individual components. The design and function of the AF system as reflected in design documents and in the text of the UFSAR are not affected.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because it does not impact any parameters upon which Technical Specifications are based.

PROCEDURE REVISION

BwOP FC-9

DESCRIPTION

The purpose of this Procedure Revision was to reflect the removal of the two bracket mounted Fuel Pool Skimmer/Strainers and the addition of a floating type skimmer in place of one of the original skimmers.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the floating skimmer provides a more reliable suction source to the skimmer pump by its ability to accommodate pool level changes. Fuel Pool siphoning via the replacement floating skimmer is eliminated by installation of a siphon break hole in the suction line.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because material compatibility regarding pool chemistry and mechanical compatibility regarding pump performance were considered and found to be negligible.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

EXEMPT CHANGE

E20-1/2-98-230

DESCRIPTION

The purpose of this Exempt Change was to replace the diesel generator exhaust stack rupture disks (1/2DO24MA/MB). The new rupture disks will have a new burst pressure of 2.25 psig (minimum)/3.25 psig (maximum) at 40°F.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the safety function of the diesel generator exhaust stack rupture disk is to prevent loss of the diesel generator due to exhaust stack damage following any postulated tornado missile impact. This design change ensures that the rupture disk will burst before backpressure increases to the point that the diesel power output is adversely affected. The rupture disks cannot initiate an accident. Therefore, the probability of an accident has not changed.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. During normal diesel operation with the exhaust stack intact, the minimum burst pressure is sufficiently high to ensure that the rupture disk will not spuriously burst during diesel generator operation. If the exhaust stack is damaged due to a postulated tornado missile impact, the maximum burst pressure is sufficiently low to ensure that the rupture disk will burst before engine performance is adversely affected. There are no new failure modes associated with this change. There are no changed interactions and diesel operation is not affected.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the function of the Diesel Oil and Diesel Generator systems has not changed. The change does not affect any parameters upon which the Technical Specifications are based.

DOCUMENT CHANGE REQUEST TEST

E20-1-97-202-1

DESCRIPTION

The purpose of this Document Change Request Test was to verify proper operation of newlyinstalled switches (with new setpoints) in the Component Cooling (CC) return line from the Reactor Coolant Pump (RCP) thermal barriers. Manual and automatic functions of valve MOV 1CC685 will be verified, and undesirable closure of valve 1CC685 upon start of a second CC Pump will be checked to be corrected.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the temporary loss of CC flow through the thermal barriers of the RCPs does not affect operation of the RCPs. The overall CC system will be operated per normal operating procedures. Deliberate cycling of 1CC685 will be done with no RCPs operating. This test is be performed in Modes 5, 6 or defueled.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the CC System design, functions, and operation remain unaffected by the performance of this test. Loss of CC flow to the RCP thermal barriers is an analyzed transient.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the function and operation of the CC system is not changed by the performance of this test. The activity does not affect any parameters upon which the Technical Specifications are based.

PROCEDURE REVISION

0/1/2 BwVSR 5.5.8.CC.1 1/2 BwVSR 5.5.8.CC.2

DESCRIPTION

The purpose of this Procedure Revision was to replace several existing Component Cooling (CC) Pump ASME pump surveillance procedures with new procedure numbers. Other procedure changes are being made to update needed reference information due to Improved Technical Specifications. In addition several changes to the body of the procedure are being made to incorporate the new ASME OMa-6 code year requirements. The use of this new code year affects the waiting period that the pump needs to be running before data can be collected (reducing the time from 5 minutes to 2 minutes), and the acceptance criteria for the allowable head pressure developed by the pumps has been changed.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. The performance of these surveillance procedures will have no impact on the initiating events associated with any accident. These procedure changes affect the method by which the CC pumps are being tested (the CC system line up has not been changed).
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the surveillance procedures will be performed the exact same way as previously performed. Most of the changes are editorial in nature. However, use of the new ASME code year for OM-6 will relax the acceptance criteria for the developed head requirements of the CC System pumps. The new code requirements allow +/-10% acceptable range with respect to the pump reference values. The new acceptance values have been evaluated and have been determined to be acceptable with respect to the design basis of the CC Pumps. The lower limit for the developed pump differential pressure (psid) is not being changed in a significant manor (i.e. the lower limit has been rounded up to the nearest whole number). The new ASME Code year requirements have only affected the upper limit for developed pump differential pressure, changing it from a +2% allowable to a +10% allowable (with respect to the reference value for pump differential pressure).
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced. The performance of these surveillances will ensure the CC Pumps ability to satisfy their design basis functions and provide the data needed to trend pump performance.

MODIFICATION

M20-1-94-005 M20-2-94-005

DESCRIPTION

The purpose of this Modification was to increase the 1A and 2A Emergency Diesel Generator (EDG) underfrequency relay actuation time delay from 0.5 seconds to 2.5 seconds. The change assured that an inadvertent underfrequency trip will not occur during load sequencing transients.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the change will not affect the reliability of the switchyard, System Auxiliary Transformers or other auxiliary power equipment. The change will not affect the capability of the Emergency Diesel Generator (EDG) to perform its intended safety function to mitigate accidents. The change will not affect the probability of occurrence of an underfrequency trip of the EDG.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the change will not adversely affect EDG protection. All new control panel devices will be qualified and seismically mounted and will not adversely affect other panel devices. No new failure modes have been introduced by new devices. New devices will have negligible impact on battery sizing. ECCS flowrates will continue to meet the intended design required flows during all accident conditions. The effects of short-term reduced frequency during the EDG loading sequence was analyzed. The analysis considered the reduced frequency effects on induction motors, Motor Operated Valves , chargers, and inverters. The short underfrequency transient will have insignificant effects on equipment. The change introduces no adverse impact on systems or functions.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

NUCLEAR WORK REQUEST (NWR)

DESCRIPTION

The purpose of this Nuclear Work Request was to address the installation, testing, operation and removal of a temporary construction elevator at approximately 22 degrees azimuth on the Unit 1 Containment Building.

SAFETY EVALUATION SUMMARY

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because tornado, high winds and seismic event frequency are determined by regional meteorological and geological conditions, not by the presence and operation of the temporary construction elevator. The restraint system of the elevator is designed to control failure of components so that there are no affected SSCs within the fall zone. If components are not restrained they will be enveloped by design basis tornado missiles and therefore will not adversely impact SSCs required to mitigate the consequences of an accident and will not adversely impact SSCs important to safety.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there are no new or different events created as a result of the presence and operation of the temporary construction elevator because the elevator has no impact or interface with and does not modify any safety related or important to safety SSC. In addition, the elevator restraint system is designed to preclude any adverse impacts on SSCs that would create the possibility of an accident or malfunction of a type different than previously evaluated in the SAR.
- 3. The margin of safety, as defined in the Bases of the Technical Specification, is not reduced because this activity does not affect any parameters or components upon which the Technical Specifications are based.

NUCLEAR WORK REQUEST (NWR)

980041279-01

DESCRIPTION

The purpose of this Nuclear Work Request (NWR) was to install, test, operate and remove the temporary construction elevator at approximately 22 degrees azimuth on the Unit 1 Containment Building. It also addressed the temporary rerouting and reinstallation of containment dome drain piping, temporary modifications to the containment buttress and gallery platform steel and temporary removal and reinstallation of buttress siding.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. tornado, high winds and seismic event frequency are determined by regional meteorological and geological conditions, not by the presence and operation of the temporary construction elevator, temporary rerouting and reinstallation of containment dome drain piping, temporary modifications containment buttress and gallery platform steel and temporary removal and reinstallation of buttress siding. The restraint system of the elevator is designed to control failure of components so that there are no affected SSCs within the fall zone. If components are not restrained they will be enveloped by design basis tornado missiles and therefore will not adversely impact SSCs required to mitigate the consequences of an accident.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because temporary construction elevator, temporary rerouting, reinstallation of containment dome drain piping, temporary modifications containment buttress and gallery platform steel and temporary removal and reinstallation of buttress siding have no impact or interface with and do not modify any safety related or important to safety SSC. In addition, the elevator restraint system is designed to preclude any adverse impacts on SSCs that would create the possibility of an accident or malfunction of a type different than previously evaluated in the SAR.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because these activities do no affect any parameters upon which the Technical Specifications are based.

MODIFICATION TEST

M20-1-95-002-1

DESCRIPTION

The purpose of this Modification Test was to verify the motor driven feedwater pump discharge control valve positions that correspond to certain pump flow rates. The motor driven feedwater pump was run in parallel with a turbine driven feedwater pump above 700 MW power and the motor driven feedwater pump recirculation valve was closed during the test such that rapid start operation was simulated.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the testing will be conducted in conjunction with approved operating procedures. Testing is more conservative that an actual rapid start of the motor driven feedwater pump since the testing only requires a normal start of the motor driven feedwater pump and discharge flow adjustments per normal operating procedures.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed testing does not increase the probability of an excess feedwater flow transient or the probability of a loss of normal feedwater flow.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the proposed testing does not alter nor challenge the operation of the safety related portions of the feedwater system. This activity does not affect any parameters upon which the Technical Specifications are based.

DOCUMENT CHANGE REQUEST

980352

DESCRIPTION

The purpose of this Document Change Request (DCR) was to correct several editorial errors on several Piping and Instrumentation Diagrams (P&IDs). All the changes need to be consistent with other design documents and current drawing convention.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the changes made are documentation changes only and are editorial in nature. These changes are required to ensure that all documentation matches the as-designed and as-built configuration of the plant. No physical changes were made and no changes were made that effect plant operations.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the changes are not physical changes. The revisions update the P&IDs to ensure that all documentation is consistent and matches current drawing convention. No changes were made that affect plant operations. These changes do not create the possibility of an accident not previously evaluated.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

MODIFICATION TEST

E20-1-97-248-1

DESCRIPTION

The purpose of this Modification Test was to test the newly installed level indicator (1LI-DO032) to: 1) verify the indicator provides accurate level indication from full to the low level alarm (as compared against the level in a tygon hose), 2) verify actuation of the low level alarm, and 3) establish and provide scale designation for the low level alarm (77%) and Technical Specification limit (74%).

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the system will be operated in its normal recirculation line up per approved procedures. Auxiliary Feedwater (AF) flow will be isolated from the Steam Generators. During modes 4, 5 or 6, the AF System is not required to function. A malfunction of the equipment during the test will have no affect on plant operation.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the modification test operates the Auxiliary Feedwater system in the recirculation mode of operation. The system is commonly operated in that manner per approved procedures. The scope of the test deals with the sightglass only. It is not postulated that a broken sightglass could create the possibility of an accident or malfunction than already evaluated in the UFSAR. In the event of sightglass failure, the AF Pump diesel engine would simply run out of fuel and stop. This would not be a concern since the AF Pump diesel engine is not required to be operable in the modes this test will be performed.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the system will be operated in its normal recirculation line up per approved procedures. This test will be performed during modes 4, 5 or 6 when the AF System is not required to function.

SPP 98-026

DESCRIPTION

The purpose of this Special Process Procedure (SPP) was to install a test gauge on the .75" diameter piping that is downstream of vent valve number 1SI044. This activity was part of the ASME Section XI 10 year pressure test of Class 1 components.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the test only entails verification of existing pressures in piping systems. The ECCS flow path will be unaffected and will remain capable of performing the design function. In the event excessive external leakage is encountered, the vent valve will be immediately closed and the test will be stopped. The valve was in constant attendance by an operator throughout the test.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this activity only involves verification of existing "as found" pressures within a piping system. No equipment, with the exception of a manual ¾" test/vent valve (1SI044) is being manipulated. Prior to opening the vent valve, a gauge assembly that is capable of withstanding RCS pressure will be installed on the piping downstream of this valve. This will essentially create a "closed system" prior to opening the valve. The valve was in constant attendance by an operator for the period it is open. No additional inventory is being introduced to the RCS or supporting safety systems.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this test only entails verification of existing pressures in piping system. The activity does not require the manipulation of any other valves and the normal ECCS flow path will be unaffected and will remain capable of performing the design function. All Technical Specification requirements were met.

SPP 98-027

DESCRIPTION

The purpose of this Special Process Procedure was to install a temporary gauge on test connection valves 1SI052 and 1SI053 to verify the existing system pressure in the Safety Injection (SI) piping to the Reactor Coolant System hot legs. This was conducted as part of the ASME Section XI 10 year pressure test of Class I Components.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this activity had no affect on equipment. The vent valves (1SI052 and 1SI053) had a pressure gauge installed on the piping downstream of it prior to it being opened. This test only entailed verification of existing pressures in the piping systems. Each of the valves was opened for a short period of time (30 minutes maximum) and was in constant attendance by the Operations Department personnel during the time they were manipulated.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this activity only involved verification of existing "as found" pressures within the piping system. No equipment, with the exception of manual .75" diameter test and vent valves (1SI052 and 1SI053) were manipulated. The normal ECCS flow paths remained intact throughout the test. Operations Department personnel were in constant attendance during the test.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

SPP 98-024

DESCRIPTION

The purpose of this Special Process Procedure (SPP) was to remove scale from inside of the Unit 2 Circulating Water (CW) tubes. This was accomplished using the installed condenser mechanical tube cleaning system referenced in the UFSAR Section 10.4. Undersized Amertap balls with a ring coating of abrasive was circulated through the A CW tube bundle only. These Amertap balls were collected and replaced with full sized Amertap balls covered with abrasive. The fully covered abrasive Amertap balls were circulated through the A CW bundle only. The process was reviewed by the system engineer at that time and a determination was made to perform the same evolution on the B/C/D CW tube bundles simultaneously. The Amertap pump mechanical seals are not hard enough to with stand the abrasive and required protection from clean flush water. A temporary supply of flushing water to the mechanical seals was supplied from the Non-essential Service Water (WS) system.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the CW (including Amertap) and WS System were operated in a manner consistent with their description in the UFSAR. Since the systems are being operated as designed, there is no increase in the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. The probability of a CW tube leak is increased, which could affect secondary water chemistry. The secondary water chemistry monitoring program (as described in UFSAR 10.3.5) which protects the Steam Generator tube integrity is unaffected by this test. Therefore, this SPP does not introduce any new failure modes.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

DOCUMENT CHANGE REQUEST

980139

DESCRIPTION

The purpose of this Document Change Request (DCR), was to change drawing M-63, sheet 1C line number 1FC41A. Currently the line is shown drawn as a tube drain but labeled as a shell drain. To comply with convention, the drawing was revised to show the line as a shell drain.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. The proposed change is editorial in nature and does not affect any equipment or cannot initiate an accident, contribute to consequences, or increase off-site dose in the event of an accident. This change made the drawing reflect actual plant conditions.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed activity does not adversely impact any system or functions so as to create the possibility of an accident or malfunction of a type different from those evaluated in the SAR. The proposed activity does not affect the initial conditions of any accidents, and does not change any Technical Specifications.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR REVISION

UFSAR Draft Revision Package 7-215

DESCRIPTION

The purpose of this UFSAR Revision was to update and incorporate the necessary information to reflect NRC approval of License Amendment 98. The change was initiated to reflect the allowance and acceptance, by the NRC, to relocate the Reactor Coolant System (RCS) pressure/temperature (P/T) limits, cold overpressure protection (LTOP) setpoint curves, reactor vessel surveillance capsule withdrawal schedule, and associated data tables from the Technical Specifications (TS) to the Pressure Temperature Limits Report (PTLR). The PTLR became part of the Technical Requirements Manual (TRM) implemented as a result of the conversion to the Improved Technical Specification (ITS) at Braidwood Station and is designated as a Licensee controlled document that may be updated under the provisions of 10CFR50.59 without NRC approval. The change approved replaces all referenced to the P/T limits and LTOP setpoint curves from the UFSAR to the appropriate PTLR figure and/or table.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the change was to update the UFSAR and maintain the Licensing Basis current. The change did not involve a change to the probabilities of occurrence or the consequences of any accident or malfunction of equipment important to safety. The change was based on the approval of License Amendment 98 by the NRC. The change ensures that the Licensing Basis documentation is current and reflects the necessary and accurate wording with respect to the approved license amendment. The impact of the licensing basis change and its impact to plant operations was performed in the supporting documentation prepared for the License Amendment request.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this change was approved to update the UFSAR to reflect the necessary wording from License Amendment 98, approved by the NRC. The possibility for an accident or malfunction of a different type was evaluated in the safety analysis performed in support of the License Amendment request prior to its submittal to the NRC.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the change was approved to update the UFSAR to maintain the licensing basis current based on NRC approval of License Amendment 98. The effects on the margin of safety were evaluated in the safety analysis performed in support of the License Amendment request prior to submittal to the NRC and were determined to not be affected or reduced.

DESIGN CHANGE

E20-2-97-248

DESCRIPTION

The purpose of this Design Change was to replace the Ashcroft Type 1188 Bourdon tube pressure/level gauge used in the application of 2LI-DO032 with a Jerguson 48-R-18 sightglass. The level indictor was converted to a sightglass because the existing gauge has proven to be an unreliable and inaccurate indication of day tank level. More positive and accurate indiciation of tank contents is desirable because there are certain circumstances under which it is imperative that the day tank not be permitted to overflow, a consequence of a false low indication. Aggravating this situation is the side-mounting of the day tank which results in a rapid level increase when filling above 80%. Adoption of the sightglass is also desired because premature tank depletion, due to a false high indication, can result in an Auxiliary Feedwater Pump trip during critical times such as post-reactor trip recovery.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the diesel-driven Auxiliary Feedwater Pump is not an accident initiator, but only mitigates the consequences of an accident. Also, the sightglass instrument loop has been designed to withstand a seismic event, thereby maintaining the fuel oil pressure boundary, which in turn allows the AF Pump to mitigate the consequences of the accident.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the instrument conversion maintains the existing safety class an seismic class convention. The safety-related instrumentation associated with the automatic day tank low level alarm is unaffected by this modification. Conversion to the sightglass does not impact the ability of any other equipment to perform as designed. No new failure modes, accidents, or malfunctions different form those evaluated in the SAR are introduced as a result of the fuel oil sightglass.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

MODIFICATION TEST

E20-1-97-00312-01 M20-1-97-002A M20-1-97-002B M20-1-97-002C

DESCRIPTION

The purpose of this Modification Test was to verify the Auxiliary Feedwater (AF) System flow capability to the Steam Generator has not been adversely affected by installation of the modification. This test ensured minimum and maximum flow limits are maintained with the valves 1AF005A-H full open and that the AF Pumps did not trip on a dual pump start.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. This activity took place in Mode 5, 6, or defueled, when the AF System was not required to be operable by Technical Specifications. Any configuration changes made by the temporary installation of test equipment was made in Mode 5, 6 or defueled and such changes were restored in the procedure. This activity interfaces with the Condensate Storage Tank (CST) and the Steam Generators (SGs). Similar to the AF System, the CST and SGs are not required to be operable in Mode 5, 6, or defueled. This testing activity does not impact any system important to safety in Mode 5, 6, or defueled and therefore does not increase the probability of a malfunction of equipment important to safety.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. This activity took place in Mode 5, 6, or defueled, when the AF System was not required to be operable by Technical Specifications. Any configuration changes made by the temporary installation of test equipment will be made in Mode 5, 6, or defueled and such changes were restored in the procedure. This activity interfaces with the CST and the SGs. Similar to the AF System, the CST and SGs are not required to be operable in Mode 5, 6, or defueled. This testing activity does not impact any system important to safety in Mode 5, 6, or defueled and therefore does not increase the consequences of a malfunction of equipment important to safety.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the AF System, the CST and SGs are not required to be operable in Mode 5, 6, or defueled. This testing activity does not impact any system important to safety in Mode 5, 6, or defueled and therefore does not decrease the margin of safety.

DESIGN CHANGE

9600025

DESCRIPTION

The purpose of this Design Change was to create a temporary construction opening of approximate dimensions 20 feet wide by 22 feet high in the Unit 1 Primary Containment wall for the steam generator removal and replacement. Removal activities include detensioning and removal of selected tendons; removal of concrete, reinforcing steel, and tendon ducts; and liner plate removal. Restoration activities include re-installing the removed portion of the liner plate, installing replacement reinforcing steel and tendon ducts, replacing the containment opening concrete, reinstalling removed tendons, and re-tensioning tendons affected by the containment opening. This safety evaluation includes the design and analysis of primary containment during and after the Steam Generator Replacement Outage and the construction activities associated with creating and restoring the opening.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the required safety-related function of the containment during and after the containment opening modification is maintained. The containment opening will have no adverse impact on the operation or function of any safety related systems, structures, or components during the time when these SSCs are required to perform a safety related function.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR, is not created because there are no new or different events created as a result of constructing and restoring the containment opening. The containment structural integrity will be maintained with two (2) horizontal (hoop) tendons removed during plant operation. The remaining tendons within the scope of the modification will be detensioned during mode 5, 6 or defueled with the primary coolant system depressurized. All tendons will be retensioned prior to entry into mode 4 after the outage. All fuel will be removed from Unit 1 and stored in the Spent Fuel Pool and shared safety-related systems will be isolated from the Unit 1 Containment or be maintained in an isolatable configuration prior to removing containment concrete, reinforcing steel and the liner plate. Unit 1 refueling activities and restoration of the systems isolated from Unit 1 Containment will not begin until the liner plate, reinforcing steel and containment concrete have been reinstalled and containment concrete has reached a strength of 3500 psi.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the containment opening construction and restoration activities have been evaluated to ensure the ultimate capacity of the Primary Containment is not affected by the temporary changes to the Containment shell structure.

MODIFICATION TEST

E20-1-96-250

DESCRIPTION

The purpose of this Modification Test was to test the replacement of the valve trim on 1CV110A done under Exempt Change E20-1-96-250. This valve controls flow from the Boric Acid Transfer Pumps to the Boric Acid Blender in the Reactor Makeup Control System (RMCS). The valve trim and the valve control scheme were modified to allow smoother operation of the valve to eliminate nuisance flow deviation alarms and closure of the valve on flow deviation conditions.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the design function of this system has not changed. This system is not an accident initiator. RMCS will respond as designed for a dilution accident.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the change was made to allow smoother operation of the installed system. The system still functions as designed. No additional equipment was added to the plant. Adjusting the stroke and control scheme for 1CV110A can not create an accident or malfunction of a different type. This change makes RMCS operation more reliable.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

DESIGN CHANGE TEST

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E20-1-97-203-1
E20-1-97-203-2
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DESCRIPTION

The purpose of these Design Change Tests was to verify proper operation of newly installed time delay relay in logic for autostart of the standby Component Cooling Water (CC) Pump on low discharge pressure. The test simulates a low pressure condition and monitors desired automatic responses of plant equipment.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the CC System was operated per normal operating procedures and the low pressure condition was simulated. Only one train of CC is required for the system to perform its normal and post-accident function, and one train was not affected by this test. This test was performed in Modes 5, 6 or defueled.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the Component Cooling Water System design, functions, and operation remain unaffected by the performance of this test. Component Cooling Water Pump operation was within normal operating bands.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the function and operation of the CC System is not changed by the performance of this test. Technical Specification requirements were met during this activity.

UFSAR REVISION

UFSAR Draft Revision Package 7-252

DESCRIPTION

The purpose of this UFSAR Revision was to change the Quality Group designation of numerous diesel-related components in applicable portions of the Diesel Generator (DG), Diesel Oil (DO), and Service Air (SA) Systems from IG to the original IC. Notes on applicable P&IDs were also revised for clarification of non-ASME substitution. The affected safety-related components are associated with equipment for which replacement parts or components are no longer available as ASME Section III, where guidance is given in Generic Letter 89-09.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, was previously evaluated in the UFSAR, is not increased because no equipment was affected. This change was administrative in nature to accurately reflect plant conditions in the UFSAR and on plant drawings.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the affected equipment, its operation and maintenance, are unaffected by the proposed activity. This change was administrative in nature to accurately reflect plant conditions in the UFSAR and on plant drawings.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the distinction between safety-related ASME (C) and safety-related non-ASME (G) does not affect any parameters upon which Technical Specifications are based.

UFSAR REVISION

UFSAR Draft Revision Package 7-251

DESCRIPTION

The purpose of this UFSAR Revision was to add a clarifying statement to UFSAR Section 10.4.9.3.1 regarding the Auxiliary Feedwater (AF) System. This change clarified that while the AF system can deliver 160 gpm flow to 3 unfaulted steam generators without operator action for 30 minutes, there are more restrictive time requirements on operator action relative to isolating a ruptured steam generator. This change removed inconsistencies in the UFSAR wording.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. No change was made to the configuration of the plant or the intended design function of the AF System or components. This is an administrative change only to remove inconsistencies in the UFSAR wording. The AF System will function as described in the UFSAR.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. This UFSAR change is for clarification purposes only. It does not result in a physical change to the AF System or its individual components. The design and function of the AF System as reflected in design documents and in the UFSAR were not affected.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

PROGRAM REVISION

Ventilation Filter Test Program

DESCRIPTION

In the transition from Current Technical Specifications to Improved Technical Specifications, the testing requirements for the Auxiliary Building Ventilation (VA) System and Control Room Ventilation (VC) System filters were changed. The purpose of this Program Revision was to restore some of these requirements and to delete some others.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because there are no physical changes being made to the plant and the acceptance criteria and test methodology remain unchanged. Filter testing will continue to be performed in accordance with the requirements of the applicable ANSI standards.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there are no physical changes to the plant as described in the UFSAR and the filters and charcoal adsorbers will continue to be tested to ensure they perform their function as described in the UFSAR. All the applicable testing requirements of the governing ANSI standards will continue to be met.
- 3. The margin of safety, as defined in the basis of the Technical Specification, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

NUCLEAR WORK REQUEST (NWR)

980005248 970056272

DESCRIPTION

The purpose of these Nuclear Work Requests was to perform hydrolazing and cleaning activities of the 1A/2A Essential Service Water (SX) System Pump room. This activity required removing floor plugs which are part of a ventilation boundary. The floor plugs had to be removed to allow the routing of hoses.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the probability of creating an initiating event of a Loss of Offsite Power, Loss of Coolant Accident (LOCA) or High Energy Line Break is not affected. Also, removing the floor plug will not affect any safety related equipment from a ventilation boundary perspective. The Auxiliary Building Ventilation (VA) System will still meet its intended functions, thus all other safety related equipment will not be affected from ventilation concerns. The airflow path essentially remains unchanged, thus VA will continue to function as before and the offsite dose analysis remains the bounding analysis.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR, is not created because this action does not have an impact on the events which initiate a LOCA or a radioactive release accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not affected since the change does not affect any temperature or differential pressure requirements in the Technical Specifications. All Technical Specifications and differential pressure requirements were met.

PROCEDURE REVISION

Emergency Operating Procedures

DESCRIPTION

The purpose of these Procedure Revisions was to incorporate the changes required due to the replacement Steam Generators and the Main Control Room chart recorder modification. Selected pen and ink strip chart paper recorders were replaced with solid state display paperless recorders. These recorders used a color liquid crystal display for local indication and included an isolated RS-485 communication card to export the data to a Data Collection Unit for storage. Approximately one months worth of data was stored locally by the recorder's internal floppy disk drive.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since all modifications, and the construction activities used to install the modifications, were evaluated for UFSAR loads and accidents were found to be within the current limits described in the UFSAR. The new solid state recorders meet or exceeded all parameters of the existing recorders including seismic, and environmental. The recorders did not modify the function of any of the systems impacted by the recorder replacement.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR, is not created because this change did not adversely affect the operation of any plant SSC important to safety. The installation of the solid state recorders did not introduce any system level failures previously considered. The recorders have a number of layers of redundancy to insure continuous data collection and operator display capability. The recorders are qualified, both seismically and environmentally for the application. The manmachine interface was reviewed by Human Factors and deemed acceptable for the application.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

PROCEDURE REVISION

BwOA INST-1

DESCRIPTION

The purpose of this Procedure Revision was to remove references to the NR-45 Selector Switch. This switch was revised as part of a modification to the Main Control Room chart recorders.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this is an administrative change to ensure the procedure reflects actual plant conditions. Removing references to the selector switch does not affect any analyzed accidents.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR, is not created because this change did not adversely affect the operation of any plant SSC important to safety. This is an administrative change to ensure the procedure reflects actual plant conditions. This activity ensures the operators are given the proper guidance in the procedure.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

DESIGN CHANGE

E20-1/2-97-267-001

DESCRIPTION

The purpose of this Design Change was to add a 1" x 1 $\frac{1}{2}$ " thermal relief valve on the inside containment chilled water supply headers at a location downstream of the containment penetration PC-6 and PC-10 inside isolation check valves 1/2WO007A and 1/2WO007B. The purpose of the relief valve is to provide a thermal overpressure relief for the isolated water-filled piping sections in containment under a Loss of Coolant Accident (LOCA) or Main Steam Line Break (MSLB) condition as discussed in NRC Generic Letter 96-06.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the reliability of existing equipment is not degraded. The Chilled Water (WO) System is not required for accident mitigation. The potential of containment flooding post-LOCA due to a stuck open relief valve is not significant since the amount of fluid added will be small. Further, the addition of the relief valve does not alter the function, but will increase the reliability of the containment isolation valves/piping during accident conditions.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created since the relief valves do not adversely impact the WO System ability to supply water to the WO cooling coils during normal plant operation. Plant operation is not changed and no new failure modes are introduced.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based. Containment integrity was maintained and plant operation were within the requirements of the Technical Specifications.

PROCEDURE REVISION

BwCB-1 Table 3-1

DESCRIPTION

The purpose of this Procedure Revision was to revise the Unit 1 Boration Dilution tables. Unit 1 Boration Dilution Tables were required to be updated following the replacement of the Unit 1 Steam Generators in refueling outage A1R07. These Tables were updated due to the larger primary system volume of the Steam Generators.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the analytical methods utilized have been approved and analysis inputs have been verified to be consistent with the current plant configuration, procedures, setpoints, and design. The transient and accident results demonstrate compliance with all of the required acceptance criteria applicable to each re-analyzed transient or accident.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the replacement steam generators were designed to the same pressure and temperature limits as the original Unit 1 Steam Generators. All external equipment and systems associated with the steam generators also operate in the same design envelope. The design parameters and all of the required acceptance criteria for the affected transients and accidents are met.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

PROCEDURE REVISION

Abnormal Operating Procedures

DESCRIPTION

The purpose of these Procedure Revisions was to incorporate the changes required due to the replacement of the Steam Generators, changes to the flow setpoint for auto closure of the 1/2CC685 valve, and changes to the Auxiliary Feedwater Pump Suction Swapover on the Operator Action Summary pages.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because all modifications, and the construction activities used to install the modifications, were evaluated for UFSAR loads and accidents were found to be within the current limits described in the UFSAR. The flow indication switches for CC685 do not perform a safetyrelated function. This change does not impact the function and operation of the Component Cooling Water System. These procedures are being revised to reflect actual plant conditions and to ensure the operators have the proper information for response to an analyzed event.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because these procedures are being revised to reflect actual plant conditions. Physical plant changes were made via modifications and each of these were evaluated per 10 CFR 50.59.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because these activities do not affect any parameters upon which the Technical Specifications are based.

DOCUMENT CHANGE REQUEST

980360

DESCRIPTION

The purpose of this Document Change Request (DCR) was to revise drawing M-35 sheet 3 and M-120 sheet 3 to indicate the size of lines 1/2MS144A, 1/2MS80AA, 1/2MS80BA, and 1/2MS80CA as ¹/₂" diameter. The change will correct these drawings to reflect the as-built plant configuration.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the dimensional changes to the sensing lines and valves on the referenced drawings will not affect the performance of the equipment they are supplying nor will the function of the Main Steam (MS) System be diminished. This is an administrative change to ensure the drawings reflect actual plant conditions.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. Any accident due to the failure of above referenced sensing lines would be bounded by the Turbine Trip or Steam Break event. This is an administrative change to ensure the drawings reflect actual plant conditions.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

PROCEDURE REVISION

BwOP SX-11

DESCRIPTION

The purpose of this Procedure Revision was to implement Essential Service Water (SX) System alterations required to drain down the SX piping is the SX Pump room for maintenance. The procedure controls the installation and removal of drain equipment between the SX001 suction valve and various SX Pump discharge valves. The procedure also controls the draining/refilling of the associated piping for maintenance/return to service, and provides temporary pumps to remove water leaking by the system isolation valves to minimize hazards during maintenance.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the failure of the SX train components effected by the maintenance will not initiate any analyzed accidents nor increase the offsite dose to the public since the system is not contaminated or radioactive. The potential for flooding is addressed in the procedure by using a continuous flood watch while the temporary drain equipment is aligned. Any flooding may be terminated by closing safety related isolation valves. Connections to other portions of the SX System for removal of leakby water is routinely monitored for abnormalities and contain contingency actions to isolate portions of the drain system to correct the problems. The redundant SX train is in operation during the maintenance period and is capable of providing the requirements of the SX System during any analyzed accident condition. All contingency actions are provided by approved Station procedures.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the procedure involves installation and removal of temporary hoses to existing drains on the SX System. These hoses do not created the possibility of any accident or malfunction different from those analyzed in the SAR. The concern for hose failure is addressed by a continuous flood watch with approved procedures in place to address any contingency actions encountered.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR REVISION

UFSAR Draft Revision Package 7-209

DESCRIPTION

The purpose of this UFSAR Revision was eliminate the safety analyses prepared that demonstrated the probability of an accidental explosion of TNT on transportation routes near the Braidwood site per the requirement of Regulatory Guide 1.91, Revision 1. Therefore, loads due to postulated accidental explosions of TNT on transportation routes near the plant site are no longer needed to be considered for maintenance, modification or other plant activities.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since an accidental explosion of TNT on transportation routes near the Braidwood Station was determined to be a non-credible event.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there are no new or different events created as a result of eliminating the TNT explosion load from the plant design basis loads.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the function of safety related structures, systems and equipment is not changed by the TNT load elimination.
DOCUMENT CHANGE REQUEST

980360

DESCRIPTION

The purpose of this Document Change Request (DCR) was to correct drawing discrepancies identified between UFSAR Figure 9.3-1, Sheet 1 of 6 (M-55-1), UFSAR Figure 9.3-1 Sheet 4 of 6 (M-55-3), P&ID M-55-2G and field installation of valves 0IA950, 0IA951, 0IA952A, 0IA952B, 0IA953, and 2IA1400. These valves are not shown on the drawing and appear to be from original construction.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since 0IA950, 0IA951, 0IA952A, 0IA952B, 0IA953, and 2IA1400 will be fully capable of maintaining the nonsafety Instrument Air (IA) System pressure boundary to support IA System operation. The IA System is not assumed to be functional during/after an accident. This is an administrative change to update the drawings to reflect actual plant conditions.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because these are manual valves and do not affect the function of the IA System during normal or accident conditions. This is an administrative change to update the drawings to reflect actual plant conditions.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR REVISION

UFSAR Draft Revision Package 7-149

DESCRIPTION

The purpose of this UFSAR Revision was remove specific dimensions for the Condensate Polisher Resin Hopper. The dimensions given in the UFSAR were not correct. These dimensions were characterized as descriptive and not design information and, thus, were removed from the text. The dimension details for the resin hopper are not required by Regulatory Guide 1.70.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this activity only removed details form the UFSAR that are descriptive. No changes are made to the resin hopper configuration. The function and operation of the resin hopper are not changed.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this activity does not make any changes to plant equipment or plant operations. Descriptive information not required by Regulatory Guide 1.70 was removed from the UFSAR.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

98007038-01

DESCRIPTION

The purpose of this Nuclear Work Request was to hydrolaze drains in the Residual Heat Removal (RH) and Containment Spray (CS) Pump rooms. To accomplish this, the RH and CS Pump room doors had to be propped open to allow hoses to be routed into the rooms.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the opening of the doors does not have any impact on the events which initiate a Loss of Coolant Accident (LOCA) and has no impact on system piping to cause a flooding accident. While the doors are open, the ECCS rooms will be verified to remain within the requirements of Technical Specifications (-.25 inches of water with respect to the outside atmosphere). Thus, opening the doors with the administrative controls in place ensures any design base accident remains bounded by the existing off-site dose boundary analysis calculation. The operation of plant safety related equipment required to mitigate the consequences of a malfunction of equipment important to safety will not be degraded due to ventilation concerns. There is no increase in the consequences of an equipment malfunction since no new assumptions are being made with regard to the reliance on equipment or equipment performance.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the affected structure provides a ventilation boundary for the Auxiliary Building Ventilation (VA) System. The High Energy Line Break analysis was reviewed for environmental impact and was determined to not adversely affect these rooms because of the open doors. Opening the doors could affect the differential pressure requirements within certain ECCS rooms, thus affecting Technical Specification requirements. Therefore, administrative controls will be established prior to and while the doors are open. This will ensure all normal and accident mitigation functions of VA System are met.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based; therefore, there is no reduction in the margin of safety.

98007038-01

DESCRIPTION

The purpose of this Nuclear Work Request was to hydrolaze the leak detection sump drains in the Essential Service Water (SX) Pump rooms. To perform this activity, the room doors were required to be propped open to allow routing of the hoses. The opening of these doors could affect Auxiliary Building Ventilation (VA).

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the operation of plant safety related equipment required to mitigate the consequences of a malfunction of equipment important to safety will not be degraded due to ventilation concerns. There is no increase in the consequences of an equipment malfunction since no new assumptions are being made with regard to the reliance on equipment performance. The open doors do not adversely affect the ventilation for the rooms and the flood analysis is not invalidated. The open doors will have no affect on the malfunction of equipment important to safety since the compensatory measures required by the SAR for evaluating a potential fire barrier (and flood barrier) will be implemented as part of the removal under the Plant Barrier Impairment program. Therefore the consequences of an accident is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the door opening will not affect any safety related equipment from a ventilation boundary perspective. The VA System will still fulfill its intended functions, thus all other safety related equipment will not be affected from ventilation concerns. Appropriate administrative controls will be implemented before opening the doors to ensure adequate flood protection for the SX pump rooms. The probability of safety equipment malfunction due to a flooding event is not increased.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because all Technical Specifications and differential pressure requirements were met.

980076038-01

DESCRIPTION

The purpose of this Nuclear Work Request (NWR) was to hydrolaze the leak detection sumps in the Unit 1B and 2B Auxiliary Feedwater (AF) Pump rooms. In order to do this, the hoses had to be run through a propped open door. This placed the plant in a configuration different from that assumed in the UFSAR.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the doors to these rooms and affected air flow paths are not related to any accident causes, or accident mitigation functions of equipment in the plant. Compensatory actions are established for the breached fire door in accordance with the Fire Protection Program. Room cooling is not adversely affected and diesel oil fumes are still being removed, but at a lower rate. Explosive gas monitoring is established to ensure that fuel oil fumes do not concentrate and present a hazard in the day tank room.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the change in air flow, breach of the fire door, and room cooling do not create any new credible failure modes for the affected equipment. Each potential degradation of a barrier is adequately compensated for to prevent any new malfunctions.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the ability to maintain the room below temperature limits is not adversely affected. The room coolers will continue to operate as designed and any communication of air with the general area of the Auxiliary Building will only help cool the Diesel Driven Auxiliary Feedwater Pump room.

980008417

DESCRIPTION

The purpose of this Nuclear Work Request was to remove flow element/monitor 0FE-VW002 from the Radwaste Building Exhause Ventilation System duct work to provide for cleaning of the flow straighteners and pitot array, after which time it will be re-installed. Removal of the flow element will provide a direct path, through duct work, from the Radwaste Building to the Radwaste Building Equipment Room. The Radwaste Building Ventilation System was taken out of service during this work activity.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since neither ventilation system is related to the sequence of events leading to the initiation of an accident and the Auxiliary Building Ventilation (VA) Sytem will remain fully functional.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because differential pressures in the room housing the flow element/monitor will continue to be maintained at a negative pressure, VA air flows remain unaffected, and the filter efficiencies are the same for both systems.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which Technical Specifications are based.

DOCUMENT CHANGE REQUEST

970193

DESCRIPTION

The purpose of this Document Change Request was to revise drawing M-196 (UFSAR Figure 5.1-3) to reflect the as-built condition of the Reactor Coolant System following implementation of the RTD Bypass Manifold Elimination project (M20-1-93-002).

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this was an administrative change to ensure the drawing reflected actual as-built conditions in the plant. This activity does not affect any equipment important to safety.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new equipment was added to the plant. This was an administrative change to ensure the drawing reflected actual as-built conditions in the plant.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

OUT-OF-SERVICE

950000801

DESCRIPTION

The purpose of this Out of Service was to maintain the flowpath from the Turbine Building drains to the Steam Generator blowdown demineralizers isolated for an extended period of time.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this flowpath is not assumed to function in an accident or transient and does not support any equipment that is assumed to function in an accident or transient.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed change will isolate Turbine Building drains from a system that is not normally used to process Turbine Building drains. This change has no effect on areas outside of radwaste processing. There is no adverse affect to plant support systems or functions to create the possibility of an accident different from those previously evaluated.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

OUT-OF-SERVICE

950007532

DESCRIPTION

The purpose of this Out of Service was to maintain all major components of the Liquid Radwaste System radwaste evaporators out of service during all modes of operation. This will prevent use for this equipment.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the radwaste evaporators are not assumed to function in an accident or transient and do not support any equipment that is assumed to function in an accident or transient.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed change will prevent operation of equipment that is not normally used to process liquid radwaste. This change has no effect on areas outside of radwaste processing. There is no adverse affect to plant support systems or functions to create the possibility of an accident different from those previously evaluated.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

OUT OF SERVICE

950003369

DESCRIPTION

The purpose of this Out of Service was to isolate the flowpath from the Radwaste Monitor Tanks to the Primary Water System since the Radwaste Monitor Tanks are no longer used to process water.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the flowpath is not assumed to function in an accident or transient and does not support any equipment that is assumed to function in an accident or transient.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed change will prevent sending water from the Radwaste Monitor Tanks to be reused in the Primary Water System. This change has no effect on areas outside of radwaste processing. There is no adverse affect on the Primary Water System or other plant systems or functions to create the possibility of an accident different from those previously evaluated.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

EXEMPT CHANGE

E20-1-96-250

DESCRIPTION

The purpose of this Exempt Change was to replace the valve trim on 1CV110A. This valve controls flow from the Boric Acid Transfer Pumps to the Boric Acid Blender in the Reactor Makeup Control System (RMCS). The valve trim and the valve control scheme were modified to allow smoother operation of the valve to eliminate nuisance flow deviation alarms and closure of the valve on flow deviation conditions.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the design function of this system has not changed. This system is not an accident initiator. RMCS will respond as designed for a dilution accident.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the change was made to allow smoother operation of the installed system. The system still functions as designed. No additional equipment was added to the plant. Adjusting the stroke and control scheme for 1CV110A can not create an accident or malfunction of a different type. This change makes RMCS operation more reliable.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

TEMPORARY ALTERATION

98-1-016

DESCRIPTION

The purpose of this Temporary Alteration was to defeat the 1AR12J interlock function to the Containment Purge (VQ) mini-purge exhaust system so VQ mini purge exhaust could remain in operation during the Bus 142 outage in refueling outage A1R07. Unit 1 was de-fueled during the activity.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the accident that 1AR12 mitigates, a Fuel Handling Accident, can not occur with Unit defueled.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because with the restriction of being defueled as a requirement the creation of any accident was not credible.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

DOCUMENT CHANGE REQUEST

980111

DESCRIPTION

The purpose of this Document Change Request (DCR) was to revise Drawing M-124-1 to show the as-built pipe sizes. This drawing and isometric drawing 2T-CD-32 were revised to indicate the new line numbers. The drawings are for the Unit 2 Auxiliary Feedwater (FW) System pumps recirculation to the Condensate Storage Tank.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the function of the AF System and CST are not affected by these changes. No physical plant changes are being made. This is an administrative change to have the drawing reflect actual plant conditions.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no physical plant changes are being made. This is an administrative change to update the drawings to reflect actual plant condition.
- 3. The margin of safety, as defined in the basis of the Technical Specification, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

SPP 98-025

DESCRIPTION

The purpose of this Special Process Procedure (SPP) was to perform an inspection of the Class 1 portion of the Safety Injection (SI) System, (specifically the B and C header Safety Injection to the Reactor Coolant System (RCS) Hot Legs and the SI Accumulator Injection lines to the RCS Cold Legs) while the RCS is at normal operating pressure. This test satisfied pressure testing requirements as specified in the ASME Section XI. The Class 1 portions of the Safety Injection to the RCS Hot Legs and the SI Accumulator Injection Lines to the Cold Legs were inspected in accordance with ASME Section XI Pressure Testing Requirements.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the vent valve (1SI011) had a Hydro pump attached downstream of it when it was open and it had a 0.375 inch reducer attached. This vent valve was only to be open long enough to obtain normal RCS operating pressure and inspect the tested piping. Conservative measures such as maintaining constant attendance by an operator during the test and only opening the valve long enough to perform the piping inspection decreased the probability of any system leakage. The test volume pressure was controlled throughout the procedure to prevent over-pressurization of the tested piping. No other valves were manipulated and the normal ECCS flow paths were intact throughout this test. In the event excessive external leakage was encountered during the test, 1SI011 would have been immediately closed and the test would have been terminated.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed activity will involve inspecting piping that could normally and is designed to be at RCS normal operating pressure. The vent valves (1SI011) had a Hydro pump attached downstream of it and when it was open and had a 0.375 inch reducer attached. This reducer minimized any leakage through the vent valve/hydro pump line to that within the capability of one Centrifugal Charging Pump so that Pressurizer level could be maintained. This vent valve was only to be opened long enough to obtain normal RCS operating pressure and inspect the piping. There was no adverse reactivity effect on the plant since the water being supplied to the Hydro pump had a boron concentration of 2200-2400 ppm. Maintaining hydro pressure below RCS pressure prevented system over-pressurization and also prevented any leakage to the RCS. The ECCS remained capable of providing their design functions throughout the test.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the function of the SI System to operate during an accident while performing this test was not hindered by the performance of this test. The vent valve will have a .375 inch reducer installed to limit the amount of flow through the valve and allow the required flow to the RCS.

98-019

DESCRIPTION

The purpose of this Special Process Procedure was to stroke the 1RH611 valve in the open and closed direction under different flow and differential pressure conditions. VOTES testing equipment will be used to measure valve torque values and other parameters. The special procedure was written to establish flow through the Residual Heat Removal (RH) Pump miniflow isolation valve such that the valve can be stroked open and closed while VOTES testing and system parameters are monitored. This special procedure was written to establish the appropriate conditions and to satisfy the requirements of NRC Generic Letter 89-10.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the RH System is being operated in accordance with approved normal operating procedures/practice. The only exception to this is removal of the auto open/close function of the valve during test performance. The function of the valve will be controlled by an approved procedure.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. The special process procedure verifies that the tested equipment (1RH611) will function in accordance with its design requirements. The RH System is being operated only slightly differently than it would normally be operated. The RH train being tested will not be required to be operational during the time it is being tested.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity will not affect any parameters upon which the Technical Specifications are based.

98-017, Rev. 1

DESCRIPTION

The purpose of this Special Process Procedure was to address the movement of heavy loads using the Fuel Handling Building crane to the temporary Material Handling System (MHS) installed on the North side of the Spent Fuel Pool (SFP). The special procedure was needed to support the Unit 1 Steam Generator Outage. This work included the use of the crane hook as a tether during load movement on the MHS and installation and removal of the Foreign Material Exclusion (FME) barrier placed on the North side of the SFP. This safety evaluation supplemented the Design Change Package (DCP) 9600030 safety evaluation (Tracking Number BRW-SE-1997-0917) to address items unique to SPP-98-017. This safety evaluation also addressed updates to station procedures BwFP FH-20, FH-20T4, and FH-20T5. The procedures clarified that the center of the hook position must be maintained within the safe load paths, and that portions of the lifted load may extend beyond the safe load paths provided no portion of a heavy lifted load extends over the Spent Fuel Pool.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since heavy loads are maintained within safe load paths.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there are no new or different events created as a result of the SPP and revisions to the crane operating procedures.
- 3. The margin of safety, as defined in the basis of the Technical Specification, is not reduced because heavy loads are maintained within the safe load paths and no portion of a heavy load is permitted to travel over fuel in the Spent Fuel Pool.

970032781-01

DESCRIPTION

The purpose of this Nuclear Work Request was to perform a freeze seal to support repair of valve 1SX2073A. This work required propping open Door D-273 to allow routing of hoses. This door is a ventilation boundary.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the propping open of the doors does not have any impact on the events which initiate a Loss of Coolant Accident (LOCA) or has no impact on system piping to cause flooding accident. Propping open of doors with the administrative controls in place to maintain differential pressure requirements ensures any design base accident remains bounded by the existing off-site dose boundary analysis calculation.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the affected structure provides a ventilation boundary for Auxiliary Building Ventilation (VA) System. The system controls radioactivity in the areas served by staging the supply air from the clean areas to the areas of greater potential contamination. Propping open of the doors could affect the differential pressure requirements within certain ECCS rooms, thus affecting Technical Specification requirements. Therefore, administrative controls will be established prior to and while the subject doors are open. The administrative controls consists of adjusting pressure control damper 0VA600Y until the auxiliary building accessible area achieves at least negative 0.3 inches water gauge pressure with respect to outside atmosphere. This will ensure all normal and accident mitigation functions of VA System are met.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because all Technical Specification and differential pressure requirements were met.

UFSAR REVISION

UFSAR Draft Revision Package 7-245

DESCRIPTION

The purpose of this UFSAR Revision was to remove the references to the low pressure (LP) turbine refurbishment program from Section 10.2.5 because the program has been completed.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the upgrades to the LP rotors provided lower LP turbine missile generation probabilities and longer LP turbine rotor life. The results of turbine generated missiles remains unchanged.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because Section 10.2.5 was reference information related to the LP turbine refurbishment program. Removal of this information due to the completion of the program does not introduce any new accidents or equipment malfunctions.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

970055079-01

DESCRIPTION

The purpose of this Nuclear Work Request was to perform cleaning of the 1B Residual Heat Removal (RH) cubicle cooler. This work required propping open Doors D-843, D-253 and D-245. These doors are ventilation barriers.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because propping open of the doors does not have any impact on the events which initiate a Loss of Coolant Accident (LOCA) or has no impact on system piping to cause flooding accident. Propping open of doors with the administrative controls in place to maintain differential pressure requirements ensures any design base accident remains bounded by the existing off-site dose boundary analysis calculation.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the affected structure provides a ventilation boundary for Auxiliary Building Ventilation (VA) System. The system controls radioactivity in the areas served by staging the supply air from the clean areas to the areas of greater potential contamination. Propping open of the doors could affect the differential pressure requirements within certain ECCS rooms, thus affecting Technical Specification requirements. Therefore, administrative controls will be established prior to and while the subject doors are open. The administrative controls consists of adjusting pressure control damper 0VA600Y until the auxiliary building accessible area achieves at least negative 0.3 inches water gauge pressure with respect to outside atmosphere. This will ensure all normal and accident mitigation functions of VA System are met.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because all Technical Specification and differential pressure requirements were met.

UFSAR REVISION

UFSAR Draft Revision Package 7-222

DESCRIPTION

The purpose of this was UFSAR Revision was to revise Table 6.4-1a, Main Control Room unfiltered infiltration rate from 15 ft3/min to 25 ft3/min. The existing value of 15 ft3/min value in UFSAR Table 6.4-1a is incorrect. Review of design basis Control Room habitability Calculation, BR-VC-02 rev. 2, showed an unfiltered infiltration rate of 25 ft3/min was actually used in the analysis.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed change was to correct the Main Control Room unfiltered infiltration rate in UFSAR Table 6.4-1a to a value consistence with the design basis analysis. The probability of occurrence or the consequences of an accident has not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because proposed change revised the incorrect value to a value consistence with design basis analysis. Upon completion of this revision, Table 6.4-1a will match the assumptions used in calculation BR-VC-02 rev. 2. No system, plant operation or equipment is affected. Therefore, there is no increase in the probability an accident or malfunction of a type different from those evaluated in the SAR.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the activity did not affect any parameters upon which the Technical Specifications are based.

UFSAR REVISION

UFSAR Draft Revision Package 7-254

DESCRIPTION

The purpose of this UFSAR Revision was to revise section 9.1.3.1 "Design Bases Spent Fuel Pool Cooling" to increase the fuel transfer rate from the reactor core to the spent fuel pool to eight assemblies per hour. At a rate of eight assemblies per hour, the defueling of 1/3 of the core (84 assemblies) and a full core (193 assemblies) will take 10.5 hours and 24.1 hours respectively. Engineering calculation (BRW-96-830-M/BYR 97-128 Rev. 1) concluded that the maximum bulk pool temperature resulting from an eight assemblies per hour transfer rate meets the spent fuel pool temperature criteria specified in NRC Standard Review Plane NUREG-0800, Section 9.1.3.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed change does not increase the failure rate of the refueling equipment or human error.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the change does not involve a physical alteration of the plant. No new equipment is being introduced, and no installed equipment is being operated in a new or different manner. There is no alteration to the parameters within which the plant is normally operated or in the setpoints which initiate protective or mitigative actions. The proposed change is to increase the fuel transfer rate based on the capability of the fuel handling equipment. This change only affects the function of the Spent Fuel Pool Cooling System (SFPCS). It has been shown that the change has no adverse effect on the SFPCS. There are no new failure modes for the fuel handling equipment or the SFPCS. Therefore, there is no possibility of an accident or malfunction of a type different from those evaluated in the UFSAR.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

TEMPORARY ALTERATION

98-1-013

DESCRIPTION

The purpose of this Temporary Alteration was to provide a source of filtered and dried air from the Service Air (SA) System to the Unit 1 Diesel Generator Rooms to support refuel outage A1R07 maintenance activities on the Instrument Air (IA) System. The temporary alteration connects to valve 1SA122C, a hose drop valve, and terminates at valve 1IA1410, an instrument air tap installed under Design Change D20-1-98-306. A desiccant air dryer and a coalescing air filter are installed in this flow path to improve the air quality supplied to the components in the Unit 1 Diesel Generator Rooms.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since this temporary alteration maintains the normal operation of the system and it is not possible for the impacted components to initiate the evaluated accidents. The affected Diesel Generators remains available to mitigate the consequences of the evaluated accidents.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there is no change in the normal operation of the Diesel Generators created by this temporary alteration. The changes do not change any initiating event or condition for the evaluated accidents. The Diesel Generators remain a reliable source of emergency power to mitigate the consequences of any accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

SPP 98-070

DESCRIPTION

The purpose of this Special Process Procedure was to drain and fill the Reactor Coolant System (RCS) during Unit 1 Steam Generator replacement activities in refueling outage A1R07.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this activity was performed while defueled and the RCS was not required to be operable in this condition. The RCS was operated as designed during this activity.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new equipment was added to the plant. The RCS was operated as designed during this activity.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

DOCUMENT CHANGE REQUEST

980034

DESCRIPTION

The purpose of this Document Change Request was to revise vendor drawing 104097. The revision was made to indicate the illustrated motor diving bell is not installed on the Containment Floor Drain Sample Pump 1/2RF03P. The Containment Floor Drain Sample Pumps are no longer relied on to meet post-accident sampling requirements.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the function of the affected equipment is unchanged. No accident initiating conditions are affected by this activity. This activity does not impact any equipment relied upon to mitigate the consequences of any accidents. The Containment Floor Drain Sample Pumps are not used for post-accident sampling.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new failure mechanism or modes are created by this activity. No actual physical changes to the plant are implemented under this activity.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR REVISION

UFSAR Draft Revision Package 7-259

DESCRIPTION

The purpose of this UFSAR Revision was to add additional methods for primary-to-secondary leakage determination. The additional methods are:

- Condenser Off-Gas analysis via the Steam Jet Air Ejectors (SJAE)
- Portable N-16 monitors for the Main Steam lines
- Chemical and radiochemical analysis of the secondary system
- Steam Generator blowdown cation columns and resin impregnated filters
- Main Steam noble gas analysis

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased by the addition of these methods and the use of portable N-16 monitors. They are not part of any accident analyzed in Chapter 15 of the UFSAR. These methods do not impact the operation of any installed Radiation Monitoring System (RMS) in the plant. They are not used for the mitigation or prevention of accidents. The N-16 monitors are not employed for quantifying radioactivity releases to the environment, and their failure does not impact radioactivity quantification.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created by the addition of these primary-to-secondary leakage detection and quantification. The use of the results of chemical and radiochemical analyses for intersystem leakage detection and quantification does not impact equipment failure, nor does it create any new type of accident. The operation of the N-16 monitors does not require interactions with other plant systems. The function of these monitors does not affect the function of the RMS of the Main Steam lines or SJAE.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

SPP 98-023

DESCRIPTION

The purpose of this Special Process Procedure (SPP) was to inject Interacid Rhodamine Dye into the Circulating Water (CW) System just downstream of the CW Pumps at a known rate. The dye concentration was measured at the condenser outlet waterboxes. This information allowed an accurate determination of the CW flow rate to be made.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the CW System was operated in a manner consistent with the UFSAR. No physical plant changes were made with this activity.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. The Interacid Rhodamine Dye was used in very small amounts, therefore it had no water chemistry effects (heat transfer rate unaffected) within the CW System. The Interacid Rhodamine Dye was used in limited quantities to limit the effect of any possible spills. Leakage in the lake screen house will enter the lake screen house sump and be discharged into the CW Pump floor bay where it will be safely diluted with large quantities of CW. A check valve was installed at the CW injection point, in order to prevent test equipment leakage from flooding or spraying electrical equipment with large quantities of CW.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

PROGRAM REVISION

Offsite Dose Calculation Manual Revision

DESCRIPTION

The purpose of this Offsite Dose Calculation Manual (ODCM) Revision is to add the Improved Technical Specification references, make format/typographical changes, and to add information regarding the Old Steam Generator Storage Facility (OSGSF).

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. There are no applicable accidents with regards to the ODCM changes. Addition of the OSGSF does not increase the probability of an event.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. The changes being made are administrative in nature and can not create an accident or malfunction of a different type than previously evaluated.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

980044097

DESCRIPTION

The purpose of this Nuclear Work Request was to perform work in the 1B/2B Essential Service Water (SX) Pump room. To perform this work, floor plugs had to be removed to allow routing of hoses and equipment. The floor plugs are considered a ventilation boundary.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the probability of creating an initiating event of a Loss of Coolant Accident (LOCA), Loss of Offsite Power, or High Energy Line Break is not affected. Also, removing the floor plug will not affect any safety related equipment from a ventilation boundary perspective. The Auxiliary Building Ventilation (VA) System will still meet its intended functions, thus all other safety related equipment will not be affected from ventilation concerns. The airflow path essentially remains unchanged, thus VA will continue to function as before and the offsite dose analysis remains the bounding analysis.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this action does not have an impact on the events which initiate a LOCA or a radioactive release accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because all Technical Specification and differential pressure requirements were met.

PROCEDURE REVISION

BwOP RC-19 BwOP RC-19T1 BwOP RC-8

DESCRIPTION

The purpose of these procedure revisions was to allow for a vacuum fill of the Reactor Coolant System (RCS) piping during a refueling outage. A vacuum will be drawn on each isolated loop (one at a time). The RCS piping will then be filled via the loop fill line from the Chemical and Volume Control System (CV) with the CV Centrifugal Charging Pumps taking suction from the Refueling Water Storage Tank (RWST) or the Volume Control Tank (VCT) with water supplied by the Reactor Coolant Make-up System. A Temporary level monitoring system for the Pressurizer is installed during this activity to monitor water level in the Pressurizer.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because these activities will not have any impact on the initiating events of any accidents analyzed in the UFSAR. The probability of any accident is not increased. The evaluation addresses the impact on RCS pressure boundary, reactivity control, core cooling, safety systems, structural loading and piping loads, vacuum system exhaust, and RCS inventory industry experience. No changes result to any initiating conditions for any accidents analyzed in the UFSAR.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created since the vacuum drawn on the isolated RCS loops and the vacuum drawn on the pressurizer volume, will enhance the RCS filling operations. The proposed new procedures do not impact the operation of any safety-related systems. The RCS pressure boundary, reactor coolant inventory, core cooling, core reactivity, and the operation of the Residual Heat Removal System will not be affected. These stresses experienced by the RCS piping under the vacuum conditions are significantly smaller that the stresses experienced during normal operating conditions. The RCS overpressure protection at low temperature will be maintained as required by the plant Technical Specifications. If the vacuum vent skid were to fail, the RCS piping of the isolated loop and the Pressurizer air space would return to atmospheric pressure conditions.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because all Technical Specifications will be met during this activity. This activity will be performed in Mode 5.

980044124

DESCRIPTION

The purpose of this Nuclear Work Request was to perform work in the 1A/2A Essential Service Water (SX) Pump room. To perform this work, floor plugs had to be removed to allow routing of hoses and equipment. The floor plugs are considered a ventilation boundary.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the probability of creating an initiating event of a Loss of Coolant Accident (LOCA), Loss of Offsite Power, or High Energy Line Break is not affected. Also, removing the floor plug will not affect any safety related equipment from a ventilation boundary perspective. The Auxiliary Building Ventilation (VA) System will still meet its intended functions, thus all other safety related equipment will not be affected from ventilation concerns. The airflow path essentially remains unchanged, thus VA will continue to function as before and the offsite dose analysis remains the bounding analysis.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this action does not have an impact on the events which initiate a LOCA or a radioactive release accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because all Technical Specification and differential pressure requirements were met.

PROCEDURE REVISION

1/2BwOA PRI-10

DESCRIPTION

The purpose of this Procedure Revision was to use a Safety Injection (SI) Pump for feed and bleed of the Reactor Coolant System (RCS) in the event that Centrifugal Charging (CV) Pump failed or in conjunction with a CV Pump if adequate flow could not be obtained with a CV Pump alone.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this activity provides explicit procedural guidance to assess and mitigate potential dilution conditions which would reduce the probability of the accident. The probability of equipment malfunction as well as the consequences of both event and equipment malfunction were found un-altered by this activity. Both the SAR and the Technical Specifications describe making SI Pumps and CV Pumps unavailable under certain conditions in Modes 4, 5, and 6. The plant is not configured in a manner different from those described in the UFSAR at any time prior to the onset of initiating event.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created since this activity is utilizing installed mitigation equipment to respond to an accident or malfunction. The equipment will be operated per its design.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

TEMPORARY ALTERATION

97-1-023

DESCRIPTION

The purpose of this Temporary Alteration was to disconnect the power supply to the 1C Reactor Coolant Pump (RCP) motor at the inner containment penetration to provide power to a temporary construction power transformer. This was needed to support activity during the Steam Generator Replacement Outage.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this activity does not affect any accident initiators or equipment used to mitigate the consequences of an accident. This activity was performed in modes 5, 6 or defueled.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new equipment is being installed in the plant. The temporary power transformer will only be installed in modes 5, 6 or defueled. Using existing cables to provide temporary power to temporary equipment in containment will not increase the possibility of an accident or malfunction not previously evaluated.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

PROCEDURE REVISION

BwOP VA-5 BwOP VA-6 BwOP VC-5

DESCRIPTION

The purpose of these Procedure Revisions was to remove steps to shutdown the charcoal filters when welding. Based on NES-MS-02.05 Rev 0, "ComEd NOD Evaluation of Containments of Charcoal Filters (Absorbers)", this document provides a standard position regarding the affects of chemical and welding fumes on charcoal filters and provides a methodology for determining when a carbon sample should be removed for lab analysis. The position ensures the guidelines established in the Technical Specifications, UFSAR, and Regulatory Guide 1.52 are not exceeded.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the volatile deposition on the charcoal or HEPA filters can not create an accident. The charcoal and HEPA filter efficiency performance and flow rates are not effected by the amount of deposition allowed on the filters. A slight change in filter ΔP may be observed but the system flow rate changes are insignificant.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because although the deposition of organic volatiles may effect filter efficiency, the small amount of volatiles (2.5 weight %) will be negligible in filter flow rates and ΔP . The SAR accident analysis will still be the bounding analysis and no new type of accident is created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR REVISION

UFSAR Draft Revision Package 7-211

DESCRIPTION

The purpose of this UFSAR Revision was to change wording in Section 9.5.4.2 (Page 9.5-8) to reflect the current as-built conditions regarding the safety-related Diesel Oil (DO) storage tanks. The current wording stated: "In the event of damage to the fill or vent lines, each tank has a capped of 4-inch line in the fill system (see figure 9.5-1, sheet 1). This category I line could be opened and used as either an emergency fill or vent line if required." The as-built configuration was that there was one capped off 4-inch line shared amongst the Unit 1 25,000-gallon storage tanks and this capped connection was welded. On Unit 2 there was one capped off 4-inch line (welded) for each of the two 50,000-gallon storage tanks (no discrepancy). The change to the UFSAR was as follows: "In the event of damage to the fill or vent lines, the tanks have a welded capped off 4-inch line in the fill system (see figure 9.5-1, sheet 2). This category I line could be opened and used as either an emergency fill or vent line if required."

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. This category I line could be opened and used as either an emergency fill or vent line if required. The caps are associated with the Emergency Diesel Generator (EDG) fuel oil storage tanks which contain and supply fuel to the EDG in the event of a Design Basis Accident (DBA).
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. This is not an operability concern nor will the proposed activity affect the operations of the plant because the design basis of the DO System is still being met in that there are alternate methods of venting the storage tanks in the event of tornado or missile damage to the non-safety vent lines on the Auxiliary Building roof. As stated in the same UFSAR paragraph, "additionally, the overflow line (4-inch diameter) would serve to vent the tank." Additionally, the welded cap could still be removed and utilized as a fill/vent if needed.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced. The design basis of the DO System is still being met in that there are alternate methods of venting the storage tanks in the event of tornado or missile damage to the non-safety vent lines on the Auxiliary Building roof. The welded caps do not contribute to any equipment malfunction.

DESIGN CHANGE

D20-2-98-317

DESCRIPTION

The purpose of this Design Change was to allow the replacement of defective Barton 753 transmitter for the Turbine Impulse Pressure (2PT-0506) loop with a Rosemount model 1153 transmitter.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. The Rosemount transmitter is a qualified nuclear grade instrument whose critical characteristics are the same as, or better than, that of the Barton. The modification does not affect the ability of the instrument loop to anticipate the loss of turbine load.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created since the direct replacement of the Barton 753 transmitter with the Rosemount 1153 transmitter will have no impact on the potential consequence of the expected off-site dose release already analyzed for the Chapter 15 accidents. The replacement of the Barton 753 with the Rosemount 1153 does not influence the potential for dose release. Credit is not taken in Chapter 15 for the Turbine Impulse Pressure loop preventing or mitigating the consequences of an analyzed accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced, because this activity does not affect any parameters upon which the Technical Specifications are based.

DESIGN CHANGE

D20-1-98-1848

DESCRIPTION

The purpose of this Design Change was to add two new Instrument Air (IA) taps to Unit 1.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the added taps do not affect the function of the IA System. The IA System is non-safety related system. All safety related valves, which use the IA for actuation, are designed to fail in their safe position. Additionally, the IA System is non-radioactive. The new taps are adequately supported per the applicable design guidelines.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created since because the proposed change to the IA System does initiate or alter the initial conditions of any accident. The IA System will continue to function as designed.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.
BwOP WX-900

DESCRIPTION

The purpose of this Procedure Revision was to temporarily place portable sump pump(s) within Station sump(s) which contain permanently installed sump pump(s) on those occasions when the permanently installed sump pumps are not available to perform their function.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. The Auxiliary Building Floor Drain Sump and its level alarms are used to mitigate the consequences of the Radioactive Liquid Waste System Leak or Failure accident. This activity is not a precursor to this accident to affect its probability. This activity would help to mitigate the consequences of this accident because it provides additional water removal capacity in the event that the permanently installed sump pump becomes unavailable. Therefore accident consequences are not increased. A malfunction of equipment important to safety, as previously evaluated in the SAR is not increased. With the exception of the Reactor Building Sumps during Modes 1 thru 4, these sumps or their pumps are not important to safety. The placement of portable sump pump(s) within the Reactor Building Sumps, as part of this activity, is restricted to Modes 5, 6, and defueled. Therefore, in no case will equipment that is important to safety be affected.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. The portable sump pump will discharge to the same header or location as that of the permanently mounted sump pump(s) within the sump. Therefore the normal flowpath of sump discharge is maintained. The portable sump pump will have its own level control float for controlling sump level and a discharge check valve to prevent reverse rotation and backflow through the pump when used in parallel with other sump pumps. When this activity is in effect, the water removal capacity of these sumps is being preserved, since the permanent pumps are temporarily unavailable. In the case of the Reactor Building Floor Drain Sump and the Reactor Cavity Sump, the use of portable sump pumps is not covered by this activity in Modes 1 through 4. In the cases of the Turbine Building Fire and Oil Sump and the Condensate Cleanup System High and Low Conductivity Sumps, the appropriate Radiological Environmental Technical Specification of their respective radiation monitors will be entered prior to the use of portable sump pumps within those sumps.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

BwVS 500-6 BwVS 500-11

DESCRIPTION

The purpose of this Procedure Revisions was to implement the Westinghouse Dynamic Rod Worth Measurement (DRWM) testing program for both Units 1 and 2. The program was for performance of low power physics testing per Westinghouse WCAP 13360. Use of this revised testing methodology utilizes a dynamic means of determining control rod worths versus the traditional rod swap technique. The reactivity worth predictions of the control rods are validated by measurement at the beginning of each cycle. Use of the DRWM limits the time that the reactor is in a low power, just-critical condition during physics testing.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the entire DRWM test program is bounded by the assumptions and limits in the UFSAR accident analysis. In addition, the DRWM technique is not an initiator for any accidents. The procedures used for this process are written to ensure the testing is performed in a controlled and safe manner. In addition, the DRWM process and procedures do not affect the integrity of the fuel assemblies, control rods, or other reactor internals such that their function in the control of radiological consequences is affected. Therefore, the probability of occurrence or the consequences of an accident previously evaluated are not increased by this activity.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the DRWM process and procedures do not result in different response of safety-related systems and components to accident scenarios than that postulated in the UFSAR. In addition, no new equipment malfunctions have been identified which affect fission product barrier integrity with this change. No new performance requirements or changes are imposed on any equipment important to safety.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

BwOP HT-1T1 BwOP HT-E-1 BwOP HT-E2

DESCRIPTION

The purpose of these Procedure Revisions were to add new setpoints associated with a document change request. Several heat trace setpoints were updated on Station drawings 20E-2-4496E, 20E-2-4996D, 20E-1-4996D, and 20E-0-4783C. Sporadic nuisance heat trace trouble alarms were being actuated on Main Control Room annunciator panels due to high ambient temperatures and/or actual plant conditions. Adjustments were made to the setpoints to alleviate these problems.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the failure of the Boric Acid System associated with the cause of a dilution accident is not affected by operation of the heat trace system. The major cause of dilution accidents is the opening of primary water makeup control valves and failure of the blender system. Changing heat trace system maintains the Boric Acid System temperature at a minimum of 65°F. The heat trace setpoints are set within specification such that no alarm is set less than 65°F and no controller is set for less than 70°F.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the heat trace controller setpoints were raised to values between 80°F and 100°F based on the particular section of the Boric Acid System. Heat trace alarm setpoints were set for greater than or equal to 65°F. The heat trace setpoints are set within specification such that no adverse impact is placed on the Boric Acid System.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

DOCUMENT CHANGE REQUEST

980230

DESCRIPTION

The purpose of this Document Change Request (DCR) was to revise the affected valve vendor drawing to interchange the Equipment Piece Numbers and serial numbers for valves 1SX015A and 1SX015B.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since there are no physical or functional changes to the Essential Service Water (SX) System. This change is being made to have the drawings reflect actual plant conditions.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this change is only a document change. No physical changes were made to the plant. This change is being made to have the drawings reflect actual plant conditions.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

1BwGP 100-10 2BwGP 100-10 BwAR 1-14-E1 BwAR 2-14-E1

DESCRIPTION

The purpose of these Procedure Revisions was to allow Tave-Tref mismatches of $\pm 4^{\circ}$ F during normal coastdown operations.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because Tave remained within allowable limits as specified in the SAR. Allowed plant conditions are therefore bounded by existing analyses. Equipment failure probability will remain unchanged since equipment was operated within design limits. In addition, the consequences of a malfunction of equipment important to safety will not increase.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new accidents or malfunctions will result. Tave remained within the limits specified in the SAR, therefore equipment will continue to operate within designed limits.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because Tave remained within the allowable limits specified in the SAR and no Technical Specification Limits were changed. Therefore the margin of safety is not affected.

1 BwVSR TRM 3.5.d 2 BwVSR TRM 3.5.d

DESCRIPTION

The purpose of this Procedure Revision was to perform ECCS System flow balance testing using approved Westinghouse techniques.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the system alignments established within the procedure mimic the assumed system alignments during the times ECCS System would be required to function. The Residual Heat Removal System is designed to support the flow requirement of the Safety Injection and Chemical and Volume Control Systems. No Structure, System or Component operation is outside the assumed mode of operation. All testing is performed in Mode 6 or defueled where these systems are not required per Technical Specifications.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the ECCS System is tested in a manner consistent with its design. Any SSC malfunctions during testing would be consistent with previously evaluated failure modes or accidents.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

FIRE PROTECTION REPORT (FPR) REVISION

FDRP 18-068

DESCRIPTION

The purpose of this Fire Protection Report Revision was to revise Section 2.3 to describe the permanently installed compressed gas cylinders containing flammable mixtures of hydrogen and methane gases. Some of these cylinders contain hydrogen gas in concentrations from 2,000 ppm to 25% with a nitrogen balance. These cylinders are used as calibration gases for the Hydrogen Recombiners and High Radiation Sample Sink (HRSS) sampling equipment on elevation 401 feet Auxiliary Building (Fire Zone 11.5-0). Some of the cylinders contain a P-10 calibration gas which consists of a mixture containing a 10% concentration of methane gas and 90% argon. The P-10 cylinders are used for calibration and operation of the RPM-8 personnel radiation monitors on the various elevations of the Auxiliary Building. The addition of these cylinders will slightly increase the calculated fire loading for the fire zone in which they are located.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. The change of adding the compressed gas cylinders does not affect the probability of a design basis fire. The change does not add an ignition source and the flammable gas is stored in approved cylinders that protect the gas and prevents it from being the initiator of a design basis fire. The cylinders are for calibration purposes and are not creating a flame or other source of ignition. The cylinders are stored per approved procedures and in a secure position. The change of adding the compressed gas cylinders does not affect the consequences of a design basis fire. The additional fire loading resulting from the addition of the hydrogen and methane containing compressed gas cylinders does not significantly change the fire loading in each zone. This small percentage change in fire loading will not affect the consequence of the previously evaluated design basis fire since the fire zone barriers are adequate to assure safe shutdown. The change of increasing the fire zone fire loading attributed to the compressed gas cylinders does not affect the probability of a malfunction of equipment important to safety. This very small percentage change in fire loading does not challenge the fire zone barriers and will not affect the probability of malfunction of equipment important to safety.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. The hydrogen and methane gases are stored in approved compressed gas cylinders that are permanently stored in accordance with approved storage criteria. In this configuration, the stored gases do not constitute a hazard to or create the potential for a different type of accident. The small percentage changes in fire loading will not affect the consequences of malfunction of equipment present in the fire zones, because the design basis fire affecting equipment important to safety is not appreciatively changed from that currently evaluated.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced since this activity does not affect any parameters upon which the Technical Specifications are based.

TEMPORARY ALTERATION

98-0-016

DESCRIPTION

The purpose of this Temporary Alteration was to furnish a source of Instrument Air (IA) to various air operated valves and controllers in the Auxiliary Building during maintenance activities on the IA System during refueling outage A1R07. The temporary alteration connects a hose between valve 0IA108 on the 383' elevation to new valve 0IA1270 on the 401' elevation of the Auxiliary Building. Valve 0IA1270 is being installed under Design Change D20-1-98-306 to support this temporary alteration.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since this temporary alteration maintains the normal operation of the IA System and is equally as reliable as the existing Instrument Air supply to the affected Auxiliary Building loads.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there is no change in the normal operation of any equipment created by this temporary alteration. The temporary alteration has been reviewed for material compatibility, air quality, air quantity, structural support, and design loading. The temporary alteration is an equally reliable source of instrument air as the normal supply to the affected Auxiliary Building loads.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

TEMPORARY ALTERATION

98-1-018

DESCRIPTION

The purpose of this Safety Evaluation was to evaluate the maintenance activities which involve the use of linestop equipment supplied by a vendor for temporarily placing a linestop in the Unit 1 Essential Service Water (SX) train cross-tie header (1SX13A-36") in the B-Train SX Pump room at the Auxiliary Building elevation 330". Due to inability of SX isolation valves to isolate flow, linestop equipment is required to insert a stopple to temporary isolate SX flow leak-by so work can be performed to replace the 1SX143A, 1SX143B, 1SX033 and 1SX044 valves and to clean/repair the Unit 1 Component Cooling (CC) Heat Exchanger. The linestop activities are to be performed during Mode 6.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the SX and the CC Systems do not initiate or alter the initial conditions of any SAR accidents. The CC Heat Exchanger and affected portion of the SX piping are isolated by outof-service boundary valves. The linestop machines are supported with temporary supports. Engineering has shown that the SX piping maintains its structural integrity for all design basis loads, therefore the pressure boundary is maintained. During the linestop activities, both the Unit 0 and the Unit 2 CC Heat Exchangers will continue to be available and the SX supply to plant equipment is not adversely impacted. Therefore, any equipment required to stop or mitigate off site dose will be available.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there is no change to the SX and CC System functions. One SX train of the shutdown Unit (Unit 1) and both SX trains of the operating Unit's (Unit 2) are available to support plant operation. While the Unit 1 CC Heat Exchanger is inoperable, the Unit 0 and the Unit 2 CC Heat Exchangers are available to perform their safety functions as discussed in the UFSAR. Plant operation is not changed and no new failure modes are introduced.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the safety function of the SX and the CC Systems is not changed by the maintenance activities. Plant operation remains within the requirements of Technical Specification 3.7.7 and 3.7.8.

BwRP 6110-17T4

DESCRIPTION

The purpose of this Procedure Revision was to add an additional column to the release rate determination tables to make the calculations easier to perform.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the procedure change is administrative in nature, and does not affect plant equipment or operations.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the procedure change is administrative in nature, and does not affect plant equipment or operations.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

BwOP SX-12

DESCRIPTION

The purpose of this Procedure Revision was to describe the steps necessary to adjust the Essential Service Water (SX) Pump discharge flow and pressure to maintain the minimum SX System flowrate to ensure SX Pump operation with design limits and maintain Component Cooling Water (CC) System temperature greater than 60°F in accordance with the requirements of Temporary Alteration (TALT) 97-1-022. TALT 97-1-022 installed jumpers to defeat the interlock between the Reactor Containment Fan Coolers SX containment isolation valves and the SX Pumps. The jumpers defeated SX Pump start permissives related to the containment valve positions. The SX Pumps are manually operated as necessary to maintain SX System flowrates and pressure.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this procedure was only used in modes 5, 6, and defueled. The SX System does not effect the operation of any fuel handling equipment, thus does not effect the analyzed fuel handling accidents. Therefore, the probability and consequences of an accident or malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the SX and CC Systems are not operated in a manner that adversely impacts system or component functions. The procedure ensures the systems and components are operated within design parameters. Therefore, the procedure does not create any accidents or malfunctions not previously analyzed in the SAR.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

TEMPORARY ALTERATION

97-1-022

DESCRIPTION

The purpose of this Temporary Alteration was to install jumpers to defeat the interlock between Essential Service Water (SX) System containment isolation valves 1SX016A/B and 1SX027A/B and the 1A/1B SX Pumps. The installation of jumpers defeated the permissives that allow the Unit 1 SX Pumps to start only with the SX containment isolation valves fully open and allowed the pumps to be operated independent of valve position. The capability to isolate the valves, when needed, was not negated by this change.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because Unit 1 was in Mode 5, 6 or defueled. The SX Pumps were available to provide sufficient cooling to safety related equipment independent of the position of valves 1SX016A/B and 1SX027A/B, including support of Unit 2 operating, shutdown, and accident conditions.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the Unit 1 SX and Component Cooling Water System were not operated such that system and/or equipment functions were adversely impacted so as to create the possibility for an accident or malfunction of a different type. All credible accidents or malfunctions that may be created as a result of implementation of this temporary alteration have been previously evaluated in the UFSAR.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

NUCLEAR WORK REQUEST

98003865, 98003866, 98003868, 98003869

DESCRIPTION

The purpose of this Safety Evaluation was for the installation, use and removal of freeze seals during Mode 5 in Steam Generator loop A, B, C, and D upper and lower blowdown lines inside containment and upstream of their respective containment penetrations. Following application of these freeze seals and verification of the integrity of the freeze seals, the blowdown piping for these loops in the A & D and B & C Main Steam Isolation Valve (MSIV) Rooms will be severed between the containment penetrations and the outboard containment isolation valves. Immediately following severance of these pipes and prior to entry into Mode 6, manual isolation valves will be welded onto these pipes to establish an isolation device to allow entry into Mode 6.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the freeze seal activities are consistent with existing approved Station procedures and system line ups and configurations are consistent with existing requirements for applicable plant Modes. Activities have been determined to have no influential relationship with potential initiators of postulated accidents in the UFSAR, and therefore does not increase the probability of an occurrence. The consequences of accidents postulated in the UFSAR are not affected as a result of Steam Generator blowdown line freeze seal activities.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created since the freeze seal activities are consistent with existing approved Station procedures and system line ups and configurations are consistent with existing requirements for applicable plant Modes. Potential System, Structure or Component (SSC) failure has been evaluated and determined to have no impact on SSCs important to safety. Construction evolutions are consistent with existing approved Station procedures.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced and there are no Technical Specification changes resulting from this freeze seal application. Changes do not affect the parameters on which the Technical Specifications are based.

UFSAR REVISION

UFSAR Draft Revision Package 7-263

DESCRIPTION

The purpose of this UFSAR Revision was to revise Tables 3.9-2, 3.9-5, 3.9-11 and 3.9-13a to address inaccuracies regarding the inclusion of temperature effects for piping, components and component support qualification. Table 3.9-3 was revised to identify the applicable ASME Section III Subsections governing stresses for various components.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because no physical changes were made to the plant. This is an administrative change to ensure the UFSAR correctly summarizes the requirements of the ASME Code and applicable design specifications.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no physical changes were made to the plant equipment and no new equipment was added to the plant. This is an administrative change to ensure the UFSAR correctly summarizes the requirements of the ASME Code and applicable design specifications.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR REVISION

UFSAR Draft Revision Package 7-255

DESCRIPTION

As a result of the replacement of the Steam Generators on Unit 1, a review of Braidwood Operational Transient Cycle Counting procedure BwVP 850-7 was performed. During this review, it was noted that Table 3.9-1 item 8 indicated that under normal conditions unit loading and unloading between 0% and 15% of full power is designed for 580 occurrences (cycles). The purpose of this UFSAR Revision was to revise this amount to 330 cycles for a Cold Turbine Generator and 1130 cycles for a Hot Turbine generator for a total of 1460 cycles (loading) and 500 cycles (unloading). It was also noted that per Westinghouse equipment specification G-953431 dated 12/16/77, "Reactor Coolant System Model D-5 Steam Generators", Unit 2 normal condition loading between 0% and 15% of full power is designed for 350 cycles for a Cold Turbine Generator and 1190 cycles for a Hot Turbine Generator for a total of 1540 cycles. The Westinghouse design specification for Unit 2 normal condition unloading between 0% and 15% of full power is consistent with the UFSAR.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the revision to the UFSAR is consistent with the design basis for cyclic/transient limits and therefore the fatigue/usage factor will be less than one.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the revision to the UFSAR is consistent with the design basis for cyclic/transient limits and therefore the fatigue/usage factor will be less than one. For the scenario of cyclic/transient limits, a large break Loss of Coolant Accident would not be expected to occur as long as the fatigue/usage factor is less than one.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the change to the UFSAR is with in the design basis. This activity does not affect any parameters upon which the Technical Specifications are based.

ENGINEERING REQUEST

9801489

DESCRIPTION

The purpose of this Engineering Request was to evaluate the acceptability of installing a freeze seal on line 2CC48BB-1" to support the removal and bench testing of relief valve 2CC9421C. 2CC9421C is the shell side relief valve for the 2B Letdown Heat Exchanger.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the failure of the freeze seal and the expected leakage or flooding is bounded by the Auxiliary Building Flooding Analysis. In addition, the freeze seals are installed with an industry proven methodology and the likelihood of failure is minimal.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no degradation of plant equipment or systems is involved with the installation and no new failure mechanisms or modes are created as a result of the installation. The leakage from a failed freeze seal is non-radioactive and the expected leakage flowrate is within the makeup capability of the Demineralized Water and Primary Water Systems.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the installation of the freeze seal does not impact any parameters upon which the Technical Specifications are based. The maintenance activity renders the 2B Letdown Heat Exchanger unavailable, however, the Letdown Heat Exchangers are 100% capable. The 2A Letdown Heat Exchanger is capable of satisfying plant performance requirements without impacting any safety function or Technical Specification.

BWMP 3100-093

DESCRIPTION

The purpose of this Procedure Revision was to describe the installation and removal of temporary cables/hoses through the Refueling Water Storage Tank Tunnels and the Fuel Handling Building.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. During the installation of these temporary cables/hoses, the pressure in the affected areas will be verified to remain within the Technical Specification allowable ¼" negative pressure with respect to the outside atmosphere. Hence, the off-site dose resulting from any analyzed accidents will not be increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. The use of these spare penetrations will not have any impact on the events which initiate a Loss of Coolant Accident (LOCA) or radioactive release accident including a Fuel Handling Accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

DESIGN CHANGE

D20-1-98-315

DESCRIPTION

The purpose of this Design Change was to provide a different method for achieving the original tolerances for the 1B Containment Spray (CS) Pump motor anti-vibration struts. In addition, the changes that indicated in Westinghouse ECN No. 85197 for the clevis are incorporated "for record" only. The existing strut drawings have a 0.001" tolerance between the pin and the lug on the pump. The Station has requested a different method for achieving these tolerances when the struts are disassembled to perform pump motor maintenance. A snug tight fit including a requirement to limit the maximum movement along the strut axis to 0.001" is specified. The is expected to facilitate pump motor maintenance while maintaining the original tolerance.

SAFETY EVALUATION SUMMARY

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. The intended function of the anti-vibration supports did not change as a result of this Design Change. The ASME Section XI operational readiness acceptance criteria of the pump is insured by Station surveillance procedures. The anti-vibration supports on the pump motor assure that the vibration readings remain with the surveillance's acceptable limits. The antivibration supports are not associated with the initiating conditions of any UFSAR accidents. No adverse interactions are introduced to the pump motor or the structural attachments of these supports. There is no adverse impact on the safety margin of any SSCs. Based on the above, the probability of any UFSAR accidents is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. The 1B CS Pump, as part of the CS system, ensures containment depressurization and cooling capability will be available in the event of a LOCA or steam line break. The revised anti-vibration support tolerances do not adversely impact the operational readiness of the pump. Therefore, the probability of malfunction has not been increased.

The anti-vibration struts do not interact in an adverse manner with any SSCs. The intended function of the pumps does not changes as a result of the revised tolerances on the anti-vibration supports. Based on the above, the subject changes do not create the possibility of an accident or malfunction of a type different from those evaluated in the SAR.

3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this change does not affect any parameters upon which Technical Specifications are based.

SPECIAL OPERATING CONDITION

DESCRIPTION

The purpose of this activity was to open valve 1RY061 to use the Primary Water (PW) System, via a temporary hose, for inside containment decontamination. The demineralized water system, which is normally used for inside containment decontamination, is out-of-service, and unavailable for decontamination use. This activity is applicable to modes 3, 4, 5, and 6.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the Pressurizer Relief Tank spray PW supply line does not have direct contact with any safety equipment. Failure of this pipe did not initiate a SAR accident. Also, using the PW through valve 1RY061 would not impact the operation of any safety related components required to mitigate the consequences of any accident analyzed in the UFSAR or accident analysis. PW supply to other plan equipment will still be maintained.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the use of valve 1RY061 to utilize the PW would be controlled by the operator. During this activity, the function of the PW System to supply deaerated, demineralized water for boric acid solution preparation and to supply make-up water to other systems is not reduced. If needed, valve 1RY061 can be closed to restore the system back to its normal configuration. There will be no connection to other systems with the temporary hose connection. Plant operations are not changed and no new failure modes are introduced. There is no possibility of an accident or malfunction of a type different from those evaluated in the UFSAR.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the change does not affect any parameters upon which Technical Specifications are based.

ENGINEERING REQUEST

ER9800900

DESCRIPTION

The purpose of this engineering request was to evaluate the use of a freeze seal on the backwash line (1SX93BB-8") from the 1B Essential Service Water (SX) strainer. This work isolated flow from the backwash line on the 2B SX strainer and permitted replacing/repairing the backwash line isolation valve (1SX150B) from the 1B SX strainer. A blind flange was added to the piping downstream of valve 1SX150B to release the freeze seal while the valve was repaired. The freeze seal was re-established to remove the blind flange and re-install the isolation valve.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the addition of the freeze seal does not affect the operation of the SX System. The backwash piping from the 2B SX strainer has been evaluated for design loading conditions and has been found to maintain its seismic qualification. The 2B SX backwash line and thus the 2B SX train remained operable during the maintenance work. The 1B SX train was out-of-service and the applicable Technical Specification actions have been entered.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the affected SX piping has been found to be acceptable with the added weight due to the freeze jacket hardware. Contingency actions have been formulated to isolate leakage flow out of the valve's body, when the valve is disassembled, in the unlikely event of a failed freeze plug. The operation of the SX System is not altered. Potential leakage flow into the "B" SX room can be easily handled by sump pumps located in the area.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications requirements are based.

ENGINEERING REQUEST

ER9801549

DESCRIPTION

The purpose of this Engineering Request was to install Temporary Alteration (TALT) 98-2-013 which removes the front card edge connection from the Digital Rod Position Indication (DRPI) Detector/Encoder Card for rod B10 in the Data 'B' cabinet. This places DRPI for that rod into half-accuracy using Data 'A' information only.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this TALT affects the DRPI system only, which is an indication only system. It provides no control functions. The TALT does not cause a loss of the Deviation Alarm and alarm response actions are not changed. The shutdown rod insertion limits are not changed as a result of this activity. The DRPI system is physically separated from any safety systems and systems important to safety. Thus the probabilities are not increased and all accidents or malfunctions continue to be bounded by the accident analyses.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this activity places the DRPI system into half-accuracy for the affected rod, which is a condition already discussed in the SAR. The rod-off-top alarm will still annunciate as designed. No changes are made which add components to the system. Thus there is no possibility of a different type of accident or malfunction.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not exceed limits as defined in the Technical Specifications or their Bases. This change also affects only the non-safety DRPI system. Thus the margin of safety is not reduced.

DOCUMENT CHANGE REQUEST

980084

DESCRIPTION

The purpose of this Document Change Request was to revise drawing 20E-2-3994 to reflect the as-built conditions for Local Lighting Cabinet 2LL155.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this is an administrative change to ensure the drawing accurately reflects the as-built configurations. Local lighting cabinets do not initiate any accidents and do not affect any equipment used to mitigate an accident.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this is an administrative change to ensure the drawing reflects the as-built configuration. No equipment was added to the plant by this activity.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

DESIGN CHANGE

D20-2-98-219

DESCRIPTION

The purpose of this Design Change was to increase the design pressure of the discharge piping of each Diesel Fuel Oil (DO) Transfer Pump (2DO01PA/PB/PC/PD) from 50 to 60 psig to accommodate the expected relief valve backpressure of approximately 7.4 psig due to standing fuel oil in the relief valve tailpipe. This design change also makes some editorial changes on drawing M-130, sheets 1A and 1B. The symbol for the DO Transfer Pumps was changed from a centrifugal pump symbol to a positive displacement pump symbol to more adequately depict the pump type. Lines 2DOE6AA/AB/AC/AD-1/2" currently point to upstream of valves 2DO128A/B/C/D and were revised to point to dowstream of the valves.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not changed. The safety function of the Diesel Fuel Oil Transfer System is to provide each of the two Diesel Generators with sufficient oil to support diesel operation under postaccident generator loads. The safety function of the discharge relief valve for each DO Transfer Pump is to ensure the system is not subjected to an overpressure condition. This design change ensures that the piping and components are adequate for the higher pressures due to the backpressure of approximately 7.4 psig due to standing fuel oil in the relief valve tailpipe. The DO System cannot initiate any accidents. Therefore, the probability of an accident has not changed.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. During normal operation of the DO System, the expected maximum pressure is 25 psig. Therefore, increasing the design pressure from 50 to 60 psig will have no effect on normal DO System operation or Diesel Generator operation. If the DO Transfer Pump discharge piping is subjected to an overpressure condition, relief valves will relieve at an actual pressure of approximately 57.4 psig. The affected piping and components have been analyzed to be acceptable for a design pressure of 60 psig. There are no changed interactions associated with this design change and diesel operation is not affected.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the function of the DO and DG Systems has not changed. The affected piping will be pressure tested in accordance with Current Technical Specification 4.8.1.1.2.h.2.

DESIGN CHANGE

DCP 9600030

DESCRIPTION

The purpose of this Design Change was to evaluate the performance of sponge abrasive decontamination of the severed Reactor Coolant System pipe ends during the Steam Generator Replacement outage.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the design, procurement, and construction activities are consistent with and are at least as stringent as the original plant design. All other activities have been determined to have no influential relationship with potential initiators of postulated accidents in the UFSAR, and therefore does not increase the probability of an occurrence. The consequences of accidents postulated in the UFSAR are either not affected and/or bounded by existing consequences documented in the UFSAR, as a result of Steam Generator replacement activities.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the design, procurement, and construction activities are consistent with and are at least as stringent as the original plant design. Potential System Structure or Component (SSC) failure has been evaluated and determined to either have no impact on SSCs important to safety, or not to initiate a credible event. Construction evolutions are consistent with existing approved Station procedures.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because all Technical Specification changes resulting from this DCP have been submitted and approved by the NRC. All changes either do not affect the parameters in which the Technical Specifications are based or affect the parameters in a conservative direction.

Revision D

DESCRIPTION

The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "more restrictive" changes associated with TRM Section 1.0, "Use and Application".

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed changes are categorized as more restrictive and do not impact any accident analyses. Furthermore, the proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed changes are categorized as more restrictive. Furthermore, the changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

Revision D

DESCRIPTION

The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "more restrictive" changes associated with TRM Section 3.0, "TLCO and TSR Applicability".

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed changes are categorized as more restrictive and do not impact any accident analyses. Furthermore, the proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed changes are categorized as more restrictive. Furthermore, the changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

Revision D

DESCRIPTION

The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "more restrictive" changes associated with TRM Section 3.1, "Reactivity Control Systems".

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed changes are categorized as more restrictive and do not impact any accident analyses. Furthermore, the proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed changes are categorized as more restrictive. Furthermore, the changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level or safety to which these SSCs are operated and maintained. Consequently, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

Revision D

DESCRIPTION

The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "more restrictive" changes associated with TRM Section 3.3, "Instrumentation".

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed changes are categorized as more restrictive and do not impact any accident analyses. Furthermore, the proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed changes are categorized as more restrictive. Furthermore, the changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

Revision D

DESCRIPTION

The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "more restrictive" changes associated with TRM Section 3.4, "Reactor Coolant System (RCS)".

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed changes are categorized as more restrictive and do not impact any accident analyses. Furthermore, the proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed changes are categorized as more restrictive. Furthermore, the changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

Revision D

DESCRIPTION

The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "more restrictive" changes associated with TRM Section 3.5, "Emergency Core Cooling System (ECCS)".

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed changes are categorized as more restrictive and do not impact any accident analyses. Furthermore, the proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed changes are categorized as more restrictive. Furthermore, the changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

Revision D

DESCRIPTION

The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "more restrictive" changes associated with TRM Section 3.7, "Plant Systems".

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed changes are categorized as more restrictive and do not impact any accident analyses. Furthermore, the proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed changes are categorized as more restrictive. Furthermore, the changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

Revision D

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The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "more restrictive" changes associated with TRM Section 3.9, "Refueling Operations".

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed changes are categorized as more restrictive and do not impact any accident analyses. Furthermore, the proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed changes are categorized as more restrictive. Furthermore, the changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

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- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because although the proposed changes are less restrictive, no accidents are impacted. Furthermore, the proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Thus, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

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- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because although the proposed changes are less restrictive, no accidents are impacted. Furthermore, the proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the changes do not involve any physical changes to plant systems, structures or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Thus, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

Revision D

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The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "less restrictive" changes associated with TRM Section 3.3, "Instrumentation".

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because although the proposed changes are less restrictive, no accidents are impacted. Furthermore, the proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Thus, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

Revision D

DESCRIPTION

The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "less restrictive" changes associated with TRM Section 3.4, "Reactor Coolant System (RCS)".

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because although the proposed changes are less restrictive, no accidents are impacted. Furthermore, the proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the changes do not involve any physical changes to plant systems, structures or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Thus, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.
Revision D

DESCRIPTION

The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "less restrictive" changes associated with TRM Section 3.6, "Containment Systems".

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because although the proposed changes are less restrictive, no accidents are impacted. Furthermore, the proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Thus, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

Revision D

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The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specification (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "less restrictive" changes associated with TRM Section 3.7, "Plant Systems".

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because although the proposed changes are less restrictive, no accidents are impacted. Furthermore, the proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Thus, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

Revision D

DESCRIPTION

The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "less restrictive" changes associated with TRM Section 3.9, "Refueling Operations".

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because although the proposed changes are less restrictive, no accidents are impacted. Furthermore, the proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs) or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Thus, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

Revision D

DESCRIPTION

The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "administrative" changes associated with TRM Section 1.0, "Use and Application".

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed changes are administrative in nature and, consequently, do not involve any technical changes. The proposed changes are intended to clarify the requirements. The proposed changes to not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Since the proposed changes are administrative in nature, the accident analyses are unaffected. As such, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed changes are administrative in nature and, consequently do not involve any technical changes. The proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. As such, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specification and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

Revision D

DESCRIPTION

The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (CTS), specifically the "administrative" changes associated with TRM Section 2.0, "Trip Setpoints" and 2.1, "Miscellaneous Test Requirements".

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed changes are administrative in nature and, consequently, do not involve any technical changes. The proposed changes are intended to clarify the requirements. The proposed changes to not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Since the proposed changes are administrative in nature, the accident analyses are unaffected. As such, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed changes are administrative in nature and, consequently do not involve any technical changes. The proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. As such, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specification and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

Revision D

DESCRIPTION

The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "administrative" changes associated with TRM Section 3.0, "TLCO and TSR Applicability".

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed changes are administrative in nature and, consequently, do not involve any technical changes. The proposed changes are intended to clarify the requirements. The proposed changes to not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Since the proposed changes are administrative in nature, the accident analyses are unaffected. As such, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the safety analysis report is not created because the proposed changes are administrative in nature and, consequently do not involve any technical changes. The proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. As such, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specification and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

Revision D

DESCRIPTION

The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "administrative" changes associated with TRM Section 3.1. "Reactivity Control Systems".

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed changes are administrative in nature and, consequently, do not involve any technical changes. The proposed changes are intended to clarify the requirements. The proposed changes to not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Since the proposed changes are administrative in nature, the accident analyses are unaffected. As such, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed changes are administrative in nature and, consequently do not involve any technical changes. The proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. As such, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specification and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

Revision D

DESCRIPTION

The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "administrative" changes associated with TRM Section 3.2, "Power Distribution Limits".

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed changes are administrative in nature and, consequently, do not involve any technical changes. The proposed changes are intended to clarify the requirements. The proposed changes to not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Since the proposed changes are administrative in nature, the accident analyses are unaffected. As such, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed changes are administrative in nature and, consequently, do not involve any technical changes. The proposed changes to not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. As such, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specification and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

Revision D

DESCRIPTION

The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "administrative" changes associated with TRM Section 3.3, "Instrumentation".

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed changes are administrative in nature and, consequently, do not involve any technical changes. The proposed changes are intended to clarify the requirements. The proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Since the proposed changes are administrative in nature, the accident analyses are unaffected. As such, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed changes are administrative in nature and, consequently, do not involve any technical changes. The proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. As such, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

Revision D

DESCRIPTION

The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "administrative" changes associated with TRM Section 3.4, "Reactor Coolant System (RCS)".

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed changes are administrative in nature and, consequently, do not involve any technical changes. The proposed changes are intended to clarify the requirements. The proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Since the proposed changes are administrative in nature, the accident analyses are unaffected. As such, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed changes are administrative in nature and, consequently, do not involve any technical changes. The proposed changes are intended to clarify the requirements. The proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. As such, the possibility of an accident or a malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

Revision D

DESCRIPTION

The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "administrative" changes associated with TRM Section 3.5, "Emergency Core Cooling System (ECCS)".

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed changes are administrative in nature and, consequently, do not involve any technical changes. The proposed changes are intended to clarify the requirements. The proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Since the proposed changes are administrative in nature, the accident analyses are unaffected. As such, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed changes are administrative in nature and, consequently, do not involve any technical changes. The proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. As such, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

Revision D

DESCRIPTION

The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "administrative" changes associated with TRM Section 3.6, "Containment Systems".

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed changes are administrative in nature and, consequently, do not involve any technical changes. The proposed changes are intended to clarify the requirements. The proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Since the proposed changes are administrative in nature, the accident analyses are unaffected. As such, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed changes are administrative in nature and, consequently, do not involve any technical changes. The proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. As such, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

Revision D

DESCRIPTION

The purpose of this Technical Requirements Manual (TRM) Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the TRM during the conversion to Improved Technical Specifications (ITS), specifically the "administrative" changes associated with TRM Section 3.7, "Plant Systems".

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed changes are administrative in nature and, consequently, do not involve any technical changes. The proposed changes are intended to clarify the requirements. The proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Since the proposed changes are administrative in nature, the accident analyses are unaffected. As such, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed changes are administrative in nature and, consequently, do not involve any technical changes. The proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. As such, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which TS are based.

Revision D

DESCRIPTION

The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "administrative" changes associated with TRM Section 3.8, "Electric Power Systems".

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed changes are administrative in nature and, consequently, do not involve any technical changes. The proposed changes are intended to clarify the requirements. The proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Since the proposed changes are administrative in nature, the accident analyses are unaffected. As such, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed changes are administrative in nature and, consequently, do not involve any technical changes. The proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. As such, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

Revision D

DESCRIPTION

The purpose of this Technical Requirements Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "administrative" changes associated with TRM Section 3.9, "Refueling Operations".

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed changes are administrative in nature and, consequently, do not involve any technical changes. The proposed changes are intended to clarify the requirements. The proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Since the proposed changes are administrative in nature, the accident analyses are unaffected. As such, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed changes are administrative in nature and, consequently, do not involve any technical changes. The proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. As such, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

Revision D

DESCRIPTION

The purpose of this Technical Requirement Manual Revision was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specifications (ITS), specifically the "administrative" changes associated with TRM Section 5.0, "Administrative Controls".

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed changes are administrative in nature and, consequently, do not involve any technical changes. The proposed changes are intended to clarify the requirements. The proposed changes do not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Since the proposed changes are administrative in nature, the accident analyses are unaffected. As such, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed changes are administrative in nature and, consequently, do not involve any technical changes. The proposed changes to not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. As such, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as Technical Specification requirements. Consequently, the changes do not affect any parameters upon which Technical Specifications are based.

TEMPORARY ALTERATION

98-1-019

DESCRIPTION

The purpose of this Temporary Alteration was to maintain the normal operation of the 1SX169B valve under all 1B Diesel Generator operating conditions. On loss of instrument air, the 1SX169B valve fails open and the resulting Essential Service Water flow through the 1B Diesel Generator Jacket Water Cooler could potentially overcool the Jacket Water and Lube Oil Systems to the point at which Diesel Generator operability is challenged.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this temporary alteration was equally as reliable as the existing Instrument Air supply to the 1SX169B valve. The temporary alteration has been evaluated from a structural, mechanical, and operational standpoint. These evaluations determined that the operation of the 1B Diesel Generator is not affected and is fully capable of providing its accident mitigation function.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there was no change in the normal operation of any equipment created by this temporary alteration. The temporary alteration has been reviewed from a structural, mechanical, and operational standpoint. The temporary alteration was an equally reliable source of Instrument Air as the normal supply to the 1SX169B valve.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this temporary alteration did not change any parameters upon which Technical Specifications were based. The 1B Diesel Generator remains capable of performing its accident mitigation function as required for Modes 5, 6 and defueled.

DRAWING CHANGE

980398

DESCRIPTION

The purpose of this Drawing Change was to revise drawing M-60, sheets 1B, 2, 3, 4 and M-135, sheets 1B, 2, 3, and 4 to correct the wording for the Chemical Volume and Control (CV) System piping connections to the Reactor Coolant System (RCS). Currently, the discharge flow from the CV Pumps to the RCS piping is shown as being supplied by the Safety Injection Pumps.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the revision to drawing M-60, sheets 1B, 2, 3, 4 and M-135, sheets 1B, 2, 3, and 4 did not result in a physical or functional change to the CV and RC systems. This change is administrative in nature and is correcting a drawing to reflect actual plant conditions.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed change is only a drawing change. This change is administrative in nature and is correcting a drawing to reflect actual plant conditions.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity is not affecting any parameters upon which the Technical Specifications are based.

PROCEDURE REVISION

BwAR 1-4-E6

DESCRIPTION

The purpose of this Procedure Revision was to reflect the removal of the Unit 1 Equipment Status Display (ESD) System equipment. This was accomplished via Exempt Change E20-1-96-269.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because failure of the affected ESD equipment to function is not an accident initiator for any of the accidents or transients evaluated in the SAR documents. The ESD System is not relied upon to remain functional following design basis events to ensure the integrity of the reactor coolant pressure boundary, the capability to shut down the reactor and maintain it in a safe shutdown condition, or prevent or mitigate the consequences of accidents that could result in potential offsite exposures comparable to the 10 CFR Part 100 guidelines.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because these changes do not 1) alter the function of any other system or component during any plant operating modes, 2) alter any initial conditions or assumptions used in the SAR documents or transient and accident analyses, or 3) create any new failure modes. Therefore, the proposed changes will not created the possibility of an accident or transient different than those previously evaluated in the SAR documents.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

TEMPORARY ALTERATION

97-1-029

DESCRIPTION

The purpose of this Temporary Alteration was to disconnect the 1C Reactor Coolant Pump (RCP) power feed and install a temporary construction power transformer from its normal feed.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the temporary alteration will be installed and operated only in modes 5, 6, and when de-fueled. The 1C RCP will not be operated during the time of the Temporary Alteration.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because it does not involve the addition of any new accident initiators.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

NUCLEAR WORK REQUEST (NWR)

980080484, 980080485, 980082116, 980082117, 980082118, 980082119

DESCRIPTION

The purpose of these Nuclear Work Requests was to provide access for thermal expansion observations and measurements to the Steam Generator upper lateral restraint, snubbers, lower lateral restraint, Reactor Coolant Pump restraints, portions of the Main Feedwater, Main Steam, and Steam Generator Blowdown System piping systems following Steam Generator replacement. Access will be provided via installation of scaffolding and removal of insulation as required.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. The scaffolding and ladders will be installed to the requirements in Station procedures during the defueled condition through Mode 2 to ensure that they will not fail and adversely impact safety-related equipment during a Safe Shutdown Earthquake (SSE). The removal, storage and reinstallation of insulation that is required to support the thermal expansion observation and measurement activities will be performed in a manner which precludes adverse effects to safety-related SSCs.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not increased. The scaffolding and ladders will be installed to the requirements in Station procedures during the defueled condition through Mode 2 to ensure that they will not fail and adversely impact safety-related equipment during an SSE. The removal, storage and reinstallation of insulation that is required to support the thermal expansion observation and measurement activities will be performed in a manner which precludes adverse effects to safety-related SSCs. This activity is non-intrusive in nature and therefore does not increase the possibility of an accident or malfunction of a different type than previously evaluated.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

DESIGN CHANGE

9600030

DESCRIPTION

The purpose of this Design Change Package (DCP) was to provide the design for permanent and temporary components that are required for the replacement of the Unit 1 Steam Generators (SG). This DCP includes: 1) removal and replacement and the Steam Generators, 2) relocation of existing piping systems, and 3) construction activities required to support the Steam Generator replacement. The Safety Evaluation revision is issued for the following:

- Allow severance of Loops B and C SG level tap piping and Main Steam piping inside containment during Mode 6 with restrictions imposed on the placement of cranes outside containment in the vicinity of the B and C Main Steam Isolation Valve (MSIV) Room.
- Allow welding of closure plates on the Old Steam Generator (OSG) Main Steam and level tap nozzles during Mode 6.
- Provide restrictions on the use of cranes and erection of the Outside Lift System (OLS) header beam near the B and C MSIV Room when the Loop B or C Main Steam or SG level tap piping is severed in Mode 6.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the design, procurement, and construction activities are consistent with and are as least as stringent as the original plant design. All other activities have been determined to have no influential relationship with potential initiators of postulated accidents in the UFSAR, and therefore does not increase the probability of an occurrence. Additional restrictions placed on the installation of the OLS header beam and crane usage, should a Loop B or C secondary piping be severed in Mode 6, ensures consistency with the evaluations performed under the previous revision of this Safety Evaluation. The consequences of accidents postulated in the UFSAR are either not affected and/or bounded by existing consequences documented in the UFSAR, as a result of steam replacement activities.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created since the design, procurement, and construction activities are consistent with and are as least as stringent as the original plant design. Potential System Structure or Component (SSC) failure has been evaluated and determined to either have no impact on SSCs important to safety, or not to initiate a credible event. Construction evolutions are consistent with existing approved Station procedures.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because all Technical Specification changes resulting from this DCP have been submitted and approved by the NRC. All changes either do not affect the parameters in which the Technical Specifications are based, or affect the parameters in a conservative direction.

DESIGN CHANGE

9600030

DESCRIPTION

The purpose of this Design Change Package (DCP) was to provide the design for permanent and temporary components that are required for the replacement of the Unit 1 Steam Generators (SG). This DCP includes: 1) removal and replacement and the Steam Generators, 2) relocation of existing piping systems, and 3) construction activities required to support the Steam Generator replacement. The Safety Evaluation revision is issued for the following:

- Allow severance of Loops B and C SG level tap piping and Main Steam piping inside containment during Mode 6 with restrictions imposed on the placement of cranes outside containment in the vicinity of the B and C Main Steam Isolation Valve (MSIV) Room.
- Allow welding of closure plates on the Old Steam Generator (OSG) Main Steam and level tap nozzles during Mode 6.
- Provide restrictions on the use of cranes and erection of the Outside Lift System (OLS) header beam near the B and C MSIV Room when the Loop B or C Main Steam or SG level tap piping is severed in Mode 6.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the design, procurement, and construction activities are consistent with and are as least as stringent as the original plant design. All other activities have been determined to have no influential relationship with potential initiators of postulated accidents in the UFSAR, and therefore does not increase the probability of an occurrence. Additional restrictions placed on the installation of the OLS header beam and crane usage, should a Loop B or C secondary piping be severed in Mode 6, ensures consistency with the evaluations performed under the previous revision of this Safety Evaluation. The consequences of accidents postulated in the UFSAR are either not affected and/or bounded by existing consequences documented in the UFSAR, as a result of steam replacement activities.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created since the design, procurement, and construction activities are consistent with and are as least as stringent as the original plant design. Potential System Structure or Component (SSC) failure has been evaluated and determined to either have no impact on SSCs important to safety, or not to initiate a credible event. Construction evolutions are consistent with existing approved Station procedures.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because all Technical Specification changes resulting from this DCP have been submitted and approved by the NRC. All changes either do not affect the parameters in which the Technical Specifications are based, or affect the parameters in a conservative direction.

TEMPORARY PROCEDURE

TP BwVP-7564

DESCRIPTION

The purpose of this Temporary Procedure was to provide the necessary guidance to install a temporary hydraulic jumper (hose) between the 2A Essential Service Water System (SX) discharge header and a line stop machine installed on the Unit 1 SX crosstie header to permit removal of the linestop.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. The installed jumper increases the potential for leakage from the SX System; however, SX System leakage is not an initiator for any of the reviewed accidents. Therefore, the probability of an accident is not increased. The SX System is not a potentially contaminated system. Leakage from the SX System will not contribute to the offsite dose calculation. Furthermore, the temporary jumper will be isolated by the attending operator in the event of any unusual operating conditions on either Unit. This isolation occurs at safety related isolation valves thereby restoring the safety related pressure boundary of the SX System. While the installation of the temporary jumper increases the probability of SX System leakage, it does not increase the probability of system malfunction. The SX System will be protected by the attending operator who, as directed by the procedure, will throttle open the 2SX255A drain valve to pressurize the Unit 1 A Train of SX. Throttling will insure that the minimum amount of flow required to pressurize the Unit 1 A Train will be diverted from the Unit 2 SX System. Any indications of abnormal operating conditions will be communicated directly to the attending operator to insure prompt isolation of the temporary jumper and restoration of the safety related SX System pressure boundary.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. Although the jumper introduces a new potential source for system leakage, the Auxiliary Building flood analysis assumes system leakage from the pipe break of analysis can be isolated within 30 minutes. The requirement to have an operator stationed at the jumper isolation valve at all times ensures the 30 minute isolation assumption is valid.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced. The activity does not affect any parameters upon which Technical specifications are based.

MODIFICATION TEST

E20-0-96-301-004-1 E20-0-95-252-1 E20-1-95-262-1 E20-1-95-260-1

DESCRIPTION

The purpose of these Modification Tests was to test the Auxiliary Building Ventilation (VA) main supply fan, 0VA02CB. This test verified proper installation on new forged blade and fan housing assemblies and modified screen fasteners.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because existing approved procedures were used to test the system. The VA System was tested in an acceptable lineup that is already acceptable per the UFSAR and Technical Specifications.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this type of testing of the VA system does not have an impact on the events which initiate a LOCA or a radioactive release accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

DESIGN CHANGE

D20-1-98-320

DESCRIPTION

The purpose of this Design Change was to increase the stiffness for support 1CS01PB001X. This change is expected to reduce the vibration levels. However, the ASME Section XI operational readiness acceptance criteria for the Unit 1B Containment Spray (CS) Pump are insured by completion of surveillance 1BwVSR 5.5.8.CS.2.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. The anit-vibration supports are not associated with the initiating conditions of any UFSAR accidents. No adverse interactions are introduced to the pump motors or the structural attachments of these supports. All load increases have been evaluated and found to be acceptable; therefore, there is no adverse impact on the safety margin of any SSCs.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. The 1B CS Pump, as part of the CS system, ensures containment depressurization and cooling capability will be available in the event of a LOCA or steam line break. The revised anti-vibration support stiffness does not adversely impact the operational readiness of the subject pump.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced. The CS System will still function as designed. The activity does not affect any parameters upon which the Technical Specifications are based.

ENGINEERING REQUEST

ER9800661

DESCRIPTION

The purpose of this Engineering Request was to install a freeze seal on the downstream piping from relief valve 1CC9421A. The freeze seal provided component isolation from an unisolable portion of the Component Cooling Water (CC) System return header.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this freeze seal was performed with Unit 1 in a defueled condition. The Seal Water Heat Exchanger and none of its support system functions were required in this mode of operation. The freeze seal was performed using industry proven methodology on a 1" line. A failure of this line was within the limiting fault of a 3 inch high energy line break.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there was no change in the normal operation of any equipment created by this freeze seal for the mode of operation in which this activity was performed. The freeze seal installation has been reviewed form a structural, mechanical, and operational standpoint. No new failure modes or mechanisms were created for the affected system.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this temporary alteration does not change any parameters upon which Technical Specifications are based. There are no accident mitigation functions or plan/system performance requirements associated with the Seal Water Heat Exchanger in the defueled condition.

DOCUMENT CHANGE REQUEST

DCR980400

DESCRIPTION

The purpose of this Document Change Request was to revise drawing M-65-A and UFSAR Figure 9.3-5, sheet 8 to show the original design setpoint of 75 psig for relief valve 0AB8122.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the new setpoint of the relief valve did not cause an overpressurization of the boric acid transfer system or result in any functional change to the boric acid transfer system. This is an administrative change to revise the drawing to reflect actual plant conditions. System operation is not affected by this change.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed change revised the relief valve setpoint to a value which will not result in overpressurization of the system piping or batching tank. This is an administrative change to revise the drawing to reflect actual plant conditions. System operation is not affected by this change.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the function of the boric acid transfer system is not change. Raising the relief valve setpoint does not affect the ability of the system to deliver boric acid to the boric transfer pumps.

UFSAR REVISION

UFSAR Draft Revision Package 7-124

DESCRIPTION

The purpose of this UFSAR Revision was to change the wording in the Section 5.2.5.1 to include a statement to state that in addition to the Main Control Room Alarm, Station procedures provide for alternate monitoring in circumstance where the alarm function is annunciated due to non-Reactor Coolant System sources.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because Station procedures provide an alternate method to alert the operators to an increase in leakage of 1 gpm within 1 hour of it reaching the sump. This procedure allows the operators to be aware of increases in flow to the sump even while the annunciator is actuated. There are no assumptions made regarding the containment leak detection system or the containment sump in the UFSAR accident analysis that are adversely impacted by this change.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there are no new accidents or malfunctions of equipment different than previously evaluated which are created by this change. The change is procedural and allows for alternate leakage detection while the annunciator is actuated.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the leakage detection system is not changed by using the alternate alarm monitoring. The change ensures that increases in leakage of 1 gpm are identified in one hour or less after the annunciator has actuated.

DESIGN CHANGE

DCP 9600030 Add. 6

DESCRIPTION

The purpose of this Design Change is to provide the design for permanent and temporary components that are required for the replacement of the Unit 1 Steam Generators. This activity involves the installation and removal of the Outside Lift System (OLS).

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the design, procurement, and construction activities are consistent with and are at least as stringent as the original plant design. All other activities have been determined to have no influential relationship with potential initiators of postulated accidents in the UFSAR, and therefore do not increase the probability of an occurrence. Additional restrictions placed on the installation or removal of the Outside Lift System (OLS) ensures consistency with the evaluations performed under the previous revision of this safety evaluation. The consequences of accidents postulated in the UFSAR, as a result of Steam Generator replacement activities.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the design, procurement, and construction activities are consistent with and are at least as stringent as the original plant design. Additional restrictions placed on the installation of the OLS ensures consistency with the evaluations performed under the previous revision of this safety evaluation. Potential system, structure, or component (SSC) failure has been evaluated and determined to either have no impact on SSCs important to safety, or not to initiate a credible event. Construction evolutions are consistent with existing approved Station procedures.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because all Technical Specification changes resulting from this DCP have been submitted and approved by the NRC. All changes either do not affect the parameters in which the Technical Specifications are based or affect the parameters in a conservative direction.

EXEMPT CHANGE

D20-1-98-321

DESCRIPTION

The purpose of this Exempt Change was to provide the flexible conduit installation details for two Main Steam Isolation Valve (MSIV) 1MS001C limit switches based on the exemption from a poured sealant detail per EQER-00-92-029. The EQER required that the installation criteria in CHRON #197797 be followed. This exemption was noted under Detail 476 for drawing 20E-0-3391N, Revision AE. The above CHRON in conjunction with the worst case tested installation configuration for the limit switches, as documented in EQ binder EQ-GEN023, provided the justification for exempting the poured sealant.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the environmental qualification acceptance of the limit switches using the recommended conduit orientation in conjunction with the worst case tested installation configuration for the limit switches, but without the poured selant, is documented in EQ Binder EQ-GEN023. Therefore, the qualification of the affected equipment is not compromised.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the change will have no impact on systems or functions because the qualification of the affected equipment is not compromised.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

OUT-OF-SERVICE

950001537

DESCRIPTION

The purpose of this Out-Of-Service (OOS) was to isolate the 1A and 1B Boron Thermal Regeneration System (BTRS) demineralizers due to organic fouling of the resin beds. The BTRS for Units 1 and 2 at Braidwood are declared OOS until the system is abandoned in place. The mode selector switches on both Units are OOS in the OFF position to prevent system operation. The BTRS is no longer used for load following conditions because Braidwood is a base loaded plant with no plans to return to load follow operations.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the BTRS is not considered in any analysis because the system is located in the Chemical and Volume Control System letdown system and is automatically isolated from systems and components important to safety on a safety injection signal. The BTRS is not used to prevent or mitigate the consequences of any analyzed accident nor to shutdown or maintain the reactor in a shutdown condition. The isolation for the BTRS does not degrade the performance of any safety system nor increase the dose to the public for any accident.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the isolation of the BTRS does not impact any other system or component important to safety. The BTRS is automatically isolated from other systems or components important to safety by the safety injection signal. The isolation of the BTRS does not create the possibility of any accident or malfunction of a type different from those evaluated in the SAR.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

TEMPORARY PROCEDURE

TP BwVP-7565

DESCRIPTION

The purpose of this Temporary Procedure was to provide the necessary guidance to install a temporary hydraulic jumper (hose) between the 1B Essential Service Water (SX) discharge header and a line stop machine installed on Unit 1 SX crosstie header to permit removal of the linestop.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. The installed jumper increases the potential for leakage from the SX System; however, SX System leakage is not an initiator for any of the reviewed accidents. Therefore, the probability of an accident is not increased. The SX System is not a potentially contaminated system. Leakage from the SX System will not contribute to the offsite dose calculation. Furthermore, the temporary jumper will be isolated by the attending operator in the event of any unusual operating conditions on either Unit. This isolation occurs at safety related isolation valves thereby restoring the safety related pressure boundary of the SX System. While the installation of the temporary jumper increases the probability of SX System leakage, it does not increase the probability of system malfunction. The SX System will be protected by the attending operator who, as directed by the procedure, will throttle open the 2SX255A drain valve to pressurize the Unit 1 A Train of SX. Throttling will insure that the minimum amount of flow required to pressurize the Unit 1 A Train will be diverted from the Unit 2 SX System. Any indications of abnormal operating conditions will be communicated directly to the attending operator to insure prompt isolation of the temporary jumper and restoration of the safety related SX System pressure boundary.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. Although the jumper introduces a new potential source for system leakage, the Auxiliary Building flood analysis assumes system leakage from the pipe break of analysis can be isolated within 30 minutes. The requirement to have an operator stationed at the jumper isolation valve at all times ensures the 30 minute isolation assumption is valid.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced. The activity does not affect any parameters upon which Technical specifications are based.

DOCUMENT CHANGE REQUEST

980042

DESCRIPTION

The purpose of this Document Change Request (DCR) was to revise drawings M-43-6, M-43-8, M-127-3, PG-2551A-373 and PG-2551A-376 to reflect actual field piping configuration. Field walkdown of the Non-essential Service Water (WS) piping identified discrepancies between the drawings and actual field conditions.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this is an administrative change to have the drawings reflect actual plant conditions. No changes were made to the WS System in the plant.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created since this is an administrative change to have the drawings reflect actual plant conditions. No new equipment was added to the plant.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

NUCLEAR WORK REQUEST (NWR)

980081580

DESCRIPTION

The purpose of this Nuclear Work Request was to remove and reinstall 1SX002B from the 1B Essential Service Water (SX) Pump room. To perform this activity, the floor plug for the 1B/2B SX Pump room had to be removed. This floor plug is considered a ventilation boundary.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the probability of creating an initiating event of Loss of Offsite Power, Loss of Coolant Accident (LOCA), or High Energy Line Break is not affected. Also, removing the floor plug will not affect any safety related equipment from a ventilation boundary perspective. The Auxiliary Building Ventilation (VA) System will meet its intended functions, thus all other safety related equipment will not be affected from ventilation concerns. The airflow path essentially remains unchanged, thus VA will continue to function as before and the offsite dose analysis remains the bounding analysis.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the possibility of an accident or malfunction of a different type other than previously evaluated in the UFSAR is not created because this action does not have an impact on the events which initiate a LOCA or a radioactive release accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

NUCLEAR WORK REQUEST (NWR)

980097042

DESCRIPTION

The purpose of this Nuclear Work Request was to allow removal of the Essential Service Water (SX) floor plug FSO-1-4 to repair the flood seal. This flood seal is also considered part of the ventilation boundary.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the probability of creating an initiating event of Loss of Offsite Power, Loss of Coolant Accident (LOCA), or High Energy Line Break is not affected. Also, removing the floor plug will not affect any safety related equipment from a ventilation boundary perspective. The Auxiliary Building Ventilation (VA) System will still meet its intended functions, thus all other safety related equipment will not be affected from ventilation concerns. The airflow path essentially remains unchanged, thus VA will continue to function as before and the offsite dose analysis remains the bounding analysis.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this action does not have an impact on the events which initiate a LOCA or a radioactive release accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.
DESIGN CHANGE

D20-1-98-320

DESCRIPTION

The purpose of this Design Change was to increase the stiffness for support 1CS01PB001X. This change is expected to reduce the vibration levels. However, the ASME Section XI operational readiness acceptance criteria for the Unit 1B Containment Spray (CS) Pump are insured by completion of surveillance 1BwVSR 5.5.8.CS.2.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. The anit-vibration supports are not associated with the initiating conditions of any UFSAR accidents. No adverse interactions are introduced to the pump motors or the structural attachments of these supports. All load increases have been evaluated and found to be acceptable; therefore, there is no adverse impact on the safety margin of any SSCs.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. The 1B CS Pump, as part of the CS system, ensures containment depressurization and cooling capability will be available in the event of a LOCA or steam line break. The revised anti-vibration support stiffness does not adversely impact the operational readiness of the subject pump.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced. The CS System will still function as designed. The activity does not affect any parameters upon which the Technical Specifications are based.

PROCEDURE REVISION

BwMS 3350-015

DESCRIPTION

The purpose of this Procedure Revision was to incorporate the recommendations of Safety Evaluation BRW-SE-1997-1920 concerning hydrolazing activities in containment.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because hydrolazing activities in the Containment is administratively restricted to Modes 5, 6 and Defueled. A malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased due to this procedure revision because the subject revision places proper administrative controls during procedure performance to protect surrounding plant equipment.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the procedure itself ensures the containment trench drains are available for leak detection and the subject revision places proper administrative controls during procedure performance surrounding plant equipment.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based..

SETPOINT CHANGE

SSCR 98-033

DESCRIPTION

The purpose of this Setpoint Change was to revise the affected Technical Specifications Allowable Values for Tables 2.2-1 and 3.3-4 of the Current Technical Specifications (CTS) that have changed based on the results determined in the revised loop uncertainty calculations.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the Allowable Values were used as a reference basis for instrument channel operability determination only and did not have any direct relation to system or instrument channel function. The change in Allowable Values did not change the original design specifications of the channel instrumentation. The Allowable Values change did not affect the performance of the safety system which was assumed to function in the accident analysis. Therefore, the probability of malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the revised Allowable Values did not alter the intended design or operation of systems or instrument channel operations. Therefore, it does not impact accident or malfunction of a type different from those evaluated in the SAR.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the revised Allowable Values are more conservative than the existing Technical Specifications Allowable Values which increases the margin of safety.

NUCLEAR WORK REQUEST (NWR)

980092661

DESCRIPTION

The purpose of this Nuclear Work Request was to install a temporary support required at the trapeze support on the 0B Non-essential Service Water (WS) Pump discharge piping in the Lake Screen House (LSH) during removal of the 0WS287B check valve. This temporary support was required to prevent overstress of the components and associated structural attachments.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because loss of WS will result in a manual turbine trip. The temporary support assures that load re-distribution due to the WS System. No adverse interactions are introduced to the Category I portion of the LSH since the main load redistribution occurs on the rod hangers attached to the building roof. In addition, the load re-distribution on the Category I concrete floor is insignificant and has been evaluated during the installation of Design change E20-0-96-240 that installed the WS Pump discharge check valves. The loads during installation of the subject Design Change were significantly higher and envelope the loading condition due to the installation of the temporary support. The WS System is not required to mitigate any UFSAR accidents. The WS System serves non-safety related loads and is not a radiological boundary.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the temporary support assures that the structural integrity of the WS System in the LSH is maintained upon removal of the check valve and subsequent load re-distributions. No additional weight is introduced to the Category I portion of the LSH. Load re-distributions occurred mainly on the rod hangers attached to LSH roof frame. The load re-distribution on Category I concrete floor was insignificant and has been evaluated during the installation of Design Change E20-0-96-240 that installed the WS Pump discharge check valves. The loads during installation of the Design Change were significantly higher. There was no adverse impact on the intended function of any SSCs.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

SPECIAL PROCESS PROCEDURE

98-046

DESCRIPTION

The purpose of this Special Process Procedure (SPP) was developed to perform hot gap and thermal expansion measurements of the steam generator upper lateral restraint, snubbers, lower lateral restraint, and portions of the Main Feedwater (FW), Main Steam (MS), Steam Generator Blowdown (SD), and Reactor Coolant Systems (RCS) following Steam Generator (SG) replacement.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. The observation and measurement activities will not affect potential equipment failures since the activities involve observation and measurements of the gaps associated with the RC, FW, MS, SD, and SG supports. No special operation of plant equipment will be performed to support the inspection. No modifications or adjustments of SSCs will be made under this SPP.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not increased. The observation and measurement activities will not affect potential equipment failures since the activities involve observation and measurements of the gaps associated with the RC, FW, MS, SD, and SG supports. No special operation of plant equipment will be performed to support the inspection. No modifications or adjustments of SSCs will be made under this SPP.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced since implementation of SPP 98-046 will not affect any parameters upon which the Technical Specifications are based.

SPECIAL PROCESS PROCEDURE

98-046

DESCRIPTION

The purpose of this Special Process Procedure (SPP) was developed to perform hot gap and thermal expansion measurements of the steam generator upper lateral restraint, snubbers, lower lateral restraint, and portions of the Main Feedwater (FW), Main Steam (MS), Steam Generator Blowdown (SD), and Reactor Coolant Systems (RCS) following Steam Generator (SG) replacement.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. The observation and measurement activities will not affect potential equipment failures since the activities involve observation and measurements of the gaps associated with the RC, FW, MS, SD, and SG supports. No special operation of plant equipment will be performed to support the inspection. No modifications or adjustments of SSCs will be made under this SPP.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not increased. The observation and measurement activities will not affect potential equipment failures since the activities involve observation and measurements of the gaps associated with the RC, FW, MS, SD, and SG supports. No special operation of plant equipment will be performed to support the inspection. No modifications or adjustments of SSCs will be made under this SPP.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced since implementation of SPP 98-046 will not affect any parameters upon which the Technical Specifications are based.

DOCUMENT CHANGE REQUEST

DCR 960126

DESCRIPTION

The purpose of this Document Change Request (DCR) was to revise P&ID M-35, sheet 5B and Electronic Work Control System (EWCS) data to show the correct sizes for lines 1GS28A, 1GS28B, 1GS21DA, 1GS21DB. Currently, the controlled documents show each of these lines as 4" but the as-built sizes of these lines are 1GS28A-3", 1GS28b-3", 1GS21DA-2-1/2", 1GS21DB-2-1/2".

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not changed. The Gland Seal (GS) System is a non-safety related (Safety Category II), Quality Group D system. This change is an editorial change to correct the GS supply and return line sizes on controlled documents. Failure of these lines, which may lead to a turbine trip, would not change or affect any conditions described in the turbine trip accident. Therefore, the probability of an accident is not changed.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this change is a documentation change only. Plant operation is not affected, system interactions are not changed, and no new failure modes are introduced. Therefore, this change does not create the possibility of an accident or malfunction of a type different from those previously evaluated.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the function of the GS System has not changed and no Technical Specifications are affected.

SPECIAL PROCESS PROCEDURE

SPP 98-028

DESCRIPTION

The purpose of this Special Process Procedure (SPP) was to perform an information only Local Leak Rate Test (LLRT) for 1VQ011 and 1VQ012. The purpose of the LLRT was to verify the leakage past 1VQ011 and 1VQ012 was acceptable for Containment integrity.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased with the performance of this procedure. The procedure is performed to verify that the Containment pressurization penetration leakage past 1VQ011 and 1VQ012 is acceptable in order to perform ILRT. Pressurization of this Containment penetration does not affect the probability of occurrence or the consequences of an accident or malfunction of equipment important to Safety. The penetration is isolated during this procedure.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created with the removal of the blind flanges and with the performance of this test. Containment integrity will be maintained while the blind flanges are removed and throughout the performance of this test. Leakage past 1VQ011 and 1VQ012 will be verified to be with in the acceptable limits of the overall leak rate for Type B and C components. Since the penetration is isolated and Containment integrity is maintained, the possibility of an accident or malfunction of a different type is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced with these changes. All Technical Specification requirements will be met during the test.

TECHNICAL REQUIREMENTS MANUAL

TRM Revision D

DESCRIPTION

The purpose of this revision justifies relocation of Current Technical Specification (CTS) requirements, originally designated for the Technical Requirements Manual during the conversion to Improved Technical Specification (ITS), to other licensee controlled documents.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because no technical changes were made. Consequently, the proposed changes do not impact the accident analyses. Furthermore, relocation of these miscellaneous requirements does not involve any physical changes to plant systems, structures or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Thus, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no technical changes were made in relocating these former CTS requirements to other licensee controlled documents. In addition, the method of controlling subsequent changes to these miscellaneous requirements is adequate. Furthermore, relocation of these miscellaneous requirements does not involve any physical changes to plant systems, structures or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Thus, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved the relocation of certain CTS specifications and details to the TRM in its SER for Braidwood TS Amendment 98, dated 12-22-98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, subsequent relocation to other licensee controlled documents does not affect any parameters upon which TS are based.

SPECIAL PROCESS PROCEDURE

SPP 98-051

DESCRIPTION

The purpose of this Special Process Procedure was to perform a moisture carryover test following the replacement of the Steam Generators in refueling outage A1R07. This activity also includes the approval of the procedures used by the vendor (NWT Corporation). This test was also performed on Unit 2.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this activity is using installed plant equipment. The injection of a Tracer material will not affect any of the analyzed accidents or transients.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no evaluated UFSAR accidents apply to the conditions used during the Moisture Carryover Testing. No new equipment was added to the plant.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

MODIFICATION

D20-0-98-232

DESCRIPTION

The purpose of this Modification was to add drain lines to the 1J and 2J electrical manholes in the Lake Screen House (LSH). These drain lines were routed to the existing floor drains in the LSH. The drain lines were added due to water leaking into the LSH through the electrical penetrations in manholes 1J and 2J.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this activity does not affect any safety related equipment or any equipment important to safety. The manholes or LSH are not accident initiators. The manholes and floor drains in the LSH are not used to mitigate any accidents.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this activity does not have any interface with the Essential Service Water System at the LSH. It does not interface with or affect any equipment important to safety.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

ENGINEERING REQUEST

9801734

DESCRIPTION

The purpose of this Engineering Request was to evaluate a freeze seal required to be applied to the Essential Service Water (SX) return line from the 2B Auxiliary Feedwater (AF) Pump cubicle cooler. The freeze seal was required to be applied to line 2SXA9A-6", outside the 2B AF Pump room, to isolate valve 2SX194 from the SX train B return header. Valve 2SX194 was located on the common recirculation line (2SXE5A) to the SX System from the discharge of the 2A and 2B AF Pumps. This recirculation line tied into line 2SXA9A-6". This line was the SX outlet from 2B AF Pump oil coolers, gear oil coolers, and cubicle cooler. Valve 2SX194 was being inspected per approved Station procedures. This valve was located on the recirculation line from the SX system.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. The addition of the freeze seal does not affect the operation of the SX System. The AF Pumps are not required to be operable below Mode 3. The Flood analysis has also been reviewed and will not be affected.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. The affected SX piping has been found to be acceptable with the added weight due to the freeze jacket hardware. Contingency actions have been formulated to isolate leakage flow out of the valve's body, when the valve is disassembled, in the unlikely event of a failed freeze plug. The operation of the SX System is not altered.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced during the maintenance activities addressed in the evaluation. The operation of the SX System is not degraded. This activity does not affect any parameters upon which the Technical Specifications are based.

ENGINEERING REQUEST

ER 9800424

DESCRIPTION

The purpose of this Engineering Request was to address the application of a ploymer coating on Non-Essential Service Water System (WS) carbon steel gate isolation valves (1/2WS108B, 1/2WS134A, 1/2WS114, 0WS096B, 0WS097B, 0WS0136A/B/C) for erosion/corrosion protection. The polymer coatings are specifically Belzona D & A Fluid Elastomer and Belzona Ceramic R-Metal. The scope of this safety evaluation applies only to the internal upstream side of the gate valve body for the referenced isolation valves.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the WS System is a non-safety related system and is not required to mitigate any UFSAR related accidents. In additions, the WS System does not initiate or alter the initial conditions of any accidents nor is it required to mitigate the radiological consequences of any UFSAR accidents. The Belzona coating does not change the WS System parameters or plant equipment operating conditions. The coating acts to improve WS System reliability (i.e. pressure boundary integrity). Therefore, the boundary of the WS System will not be compromised in a manner that would invalidate the flood analysis of the Auxiliary Building (UFSAR 9.3.3.2). Since no new interactions with other SSCs are created and the WS has no direct interface with any safety related equipment, there is no potential adverse impact on any SSCs important to safety by using the Belzona coating in the WS System.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created since the coating acts to improve WS System reliability (i.e. pressure boundary integrity) by minimizing material degradation caused by cavitation/erosion. The WS System is not safety related and serves no safety related loads. This activity can not create the possibility of an accident or malfunction of a different type.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because there are no Technical Specification where the requirement, associated action items, associated surveillance or bases may be affected by the subject valve coating material.

PLANT BARRIER IMPAIRMENT

DESCRIPTION

The purpose of this Plant Barrier Impairment was to open door D-356, Chemistry High Level Laboratory to Auxiliary Building General Area 426' in support of Bus 144 outage. This doors is not rated (fire, flood or seismic) and acts to provide personnel ingress/egress in a Auxiliary Building Ventilation (VA)/Laboratory Ventilation (VL) boundary wall.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because both VA and VL System functions were maintained during this activity. The proposed activity allows Laboratory Ventilation air to enter the Auxiliary Building via partially open door in the High Level Laboratory. Since air is being drawn from clean areas (Chemistry Offices) to areas of potential contamination (High Level Laboratory and Auxiliary Building), the design concept of plant ventilation systems is maintained. The introduction of Laboratory Ventilation System air to the Auxiliary Ventilation System has little/no affect on the air flow path direction and temperature control of either system. The VA System provides an equivalent level of protection against the potential for release of radioactive particulate to the environment.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this system/action does not have an impact on the events which initiate a Loss of Coolant Accident or a radioactive release accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

PLANT BARRIER IMPAIRMENT

DESCRIPTION

The purpose of this Plant Barrier Impairment was to open door D-356, Chemistry High Level Laboratory to Auxiliary Building General Area 426' to provide circulation of air within the Chemistry Laboratory Complex while the ventilation system is shut down. This door is not rated (fire, flood or seismic) and acts to provide personnel ingress/egress in a Auxiliary Building Ventilation (VA)/Laboratory Ventilation (VL) boundary wall.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the VA System functions will be maintained during this activity. The proposed activity allows Laboratory Complex air to enter the Auxiliary Building via partially open door in the High Level Laboratory. Since air is being drawn from clean areas (Chemistry Offices) to areas of potential contamination (High Level Laboratory and Auxiliary Building), the design concept of plant ventilation systems is maintained. The introduction of Laboratory Complex air to the Auxiliary Building Ventilation System has little/no affect on the airflow path direction and temperature control of the VA System. The VA System provides an equivalent level of protection against the potential for release of radioactive particulate to the environment.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this system/action does not have an impact on the events which initiate a Loss of Coolant Accident or a radioactive release accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR Draft Revision Package 7-043

DESCRIPTION

The purpose of this UFSAR Revision was to update the UFSAR based on a modification to Motor Operated Valves 1(2)RH8716A which drilled a hole in the Residual Heat Removal (RH) Pump side of the valve disk. This change was made to eliminate pressure locking concerns with this valve.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the ability of the 1(2)RH8716A valves to operate has not been changed. The reliability of the equipment to operate has been increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the hole in the valve disk makes the valve undirectional in that it will only seal in one direction. This valve is not required to isolate in both directions and therefore an accident or malfunction of a different type than evaluated previously has not been created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR Draft Revision Package 7-042

DESCRIPTION

During a review conducted in accordance with NRC Generic Letter 95-07, Pressure Locking and Thermal Binding of Safety Related Gate Valves, the 1(2)RH8716A valves were determined to be susceptible to thermally induced pressure locking. The scenario which could cause pressure locking postulates opening of the 1(2)RH8716A valve for the hot leg recirculation phase of Emergency Core Cooling after being closed during the cold leg recirculation phase (source of high temperature water). This could also occur during shutdown cooling if the RH system is required to realign for a mode 4 LOCA and provide injection to all four cold legs. The purpose of this UFSAR Revision was to address the change to reflect the modification performed to prevent the pressure locking concern.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the modification will improve the reliability of the valve to function during the accident by not allowing pressure to build up in the bonnet and cause binding. The small hole in the bonnet will not affect the ability of this valve to perform its safety function. This is an administrative change to have the UFSAR reflect actual plant conditions.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because gate valves are designed to seal on the downstream side of the disk only. Therefore, with the hole drilled on the upstream (Residual Heat Removal Pump) side of the disk the valve operation is not affected. The ability of the valve to function to mitigate the consequences of a Loss of Coolant Accident is not adversely affected. This is an administrative change to have the UFSAR reflect actual plant conditions.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR Draft Revision Package 7-077

DESCRIPTION

The purpose of this UFSAR Revision was to reflect installation of a bypass line on 2SI8812A and B to prevent thermally induced pressure locking.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because installation of the bypass line has no effect on the function of the Emergency Core Cooling System. The only effect due to installation of the modification would be slight leakage past the closed SI8812 valve. This would have minimal effect and is bounded by complete failure of an SI8812 valve to close. This is an administrative change to have the UFSAR reflect actual plant conditions.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because complete failure of the SI8812 valve to close has been previously assumed and evaluated in the UFSAR. This single failure bounds any leakage that may occur through the bypass line during the recirculation phase of a Loss of Coolant Accident. During shutdown cooling, leakage past a SI8812 valve would create the same conditions as leakage through the bypass line. The bypass line is designed to the same requirements as the header line. This is an administrative change to have the UFSAR reflect actual plant conditions.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

PROCEDURE REVISION

1BwOA SEC-8

DESCRIPTION

The purpose of this Procedure Revision was to change the Pressurizer (PZR) no-load level setpoint, remove reference to the Steam Generator (SG) feedwater (FW) nozzle high flow alarm, and increased the Reactor Coolant System (RCS) boration requirements when Tave is less than 545°F due to the SG replacement modifications on Unit 1.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the installation of the new SGs and associated piping was performed in accordance with design standards, quality control, and quality assurance measures. Although different from the original plant design, the installations meet all of the original design requirements. Differences between the original SGs and the new SGs require change to setpoints to account for the mass differences inside of the RCS meets the requirements of the accident analyzes in the SAR. The new setpoints and installations meet or exceed the original design requirements.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the design of the RCS and auxiliary systems has not changed. The installation of the new components is controlled by quality assurance programs and the active components are not altered by the modifications.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR Draft Revision Package 7-052

DESCRIPTION

The purpose of this UFSAR Revision was to delete a historical UFSAR drawing list in Section 1.7 and replace it with a list of the UFSAR figures and their associated Station drawings. Text was added to indicate that the UFSAR drawing list is available in the UFSAR.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the change does not affect any accidents or malfunctions of equipment. The figures themselves are not changed; nor are the equipment and systems that they represent.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there are no changes to plant equipment or operation of plant equipment. There are no new source terms or changes that would affect the consequences of an accident. The drawing list includes references to drawings that are already part of the UFSAR.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

DESIGN CHANGE

D20-0-98-201-001

DESCRIPTION

The purpose of this Design Change was to install three new above ground concrete encased 2,000 gallon fuel dispensing tanks on Station property. The new tanks allow Station vehicles and construction equipment to be refueled on-site in compliance with all current environmental and regulatory requirements. The Station's existing underground fuel dispensing tanks required upgrade, replacement or removal from service by December 22, 1998 to meet U. S. Environmental Protection Agency (EPA) requirements. The Station chose to install new above ground tanks and to remove the existing underground tanks from service by the deadline date.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased with the installation of this plant design change. The new fuel tanks are non-safety related, are not required for safe shutdown, and are not relied upon to mitigate the consequences of an accident. The new tanks are located approximately 50 feet from the nearest safety related structure and no equipment important to safety is located near the dispensing tank locations. The probability of a fire is not increased with the installation of the new tanks since the tanks include a number of safety features to protect against fuel spillage and fire as well as a 2-hour fire rating on each tank assembly.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created by installation of three new above ground tanks. A detailed evaluation was performed and no accidents or malfunctions of a different type were identified which were not previously evaluated in the UFSAR. Events associated with fuel tanks such as spills, fires, explosions, missile generation, and vapor releases are bounded within the existing UFSAR analysis. This plant design change has no impact on the ability of any SSC to perform its safety function.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced since the plant design change does not affect any parameters upon which the Technical Specifications are based.

UFSAR Draft Revision Package 7-160

DESCRIPTION

The purpose of this UFSAR Revision was to implement administrative changes to the Shift Control Room Engineer (SCRE)/Shift Technical Advisor (STA) description and the STA training program.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the changes are administrative in nature. The requirements of the STA position have not been changed.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the changes are administrative in nature. The requirements of the STA position have not been changed.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

TEMPORARY ALTERATION

95-0-005 96-0-011

DESCRIPTION

The purpose of this activity was to install and remove, with approved administrative controls, a temporary pneumatic jumper to open valve 0WX697, Radwaste Monitor Tanks to Release Tank Inlet header Isolation, in those cases when power was not available to 0FSV-WX697 for opening the valve. The temporary pneumatic jumper will be removed and normal IA supply restored at valve 0WX697 when power is restored to operate 0FSV-WX697. This is applicable to all plant Modes.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. This change does not affect any accident scenario nor is it a precursor to any accident evaluated in the SAR to affect its probability or to increase off site dose. A malfunction of equipment important to safety, as previously evaluated in the SAR is not increased. The subject valve, the flowpath that it isolates, and components that it serves are Class D Non-Safety. The failure of this valve to close on a loss of electrical power, as is the case with the pneumatic jumper installed with its isolation valve open, does not affect any equipment that is important to safety.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. The proposed activity will temporarily replace a solenoid valve normally used to open the subject valve from the Liquid Radwaste Control Panel with a pneumatic jumper locally at the valve. The position of the valve will still be controlled by the Liquid Radwaste Operator using approved Station procedures. In the unlikely event that the valve is left open outside of those procedures, there is no possibility for an unmonitored release to the environment since the effluent will still be contained within the release tank. During a release tank release, the inlet valve to the release tank is closed by Station procedures to prevent additional radwaste effluent from entering the release tank. Also during a release, the effluent activity is monitored to maintain release limits.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced since this activity does not affect any parameters or equipment upon which the Technical Specifications are based.

NUCLEAR WORK REQUEST (NWR)

960080921

DESCRIPTION

The purpose of this Nuclear Work Request is to perform hydrolazing activities in various areas in the Auxiliary Building. To support this activity, the 2B Safety Injection (SI) Pump room door and the Unit 2 Refueling Water Storage Tank (RWST) Tunnel hatch had to be propped open to allow routing of the hoses. These doors are considered ventilation barriers.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the Auxiliary Building is required to maintain at least -0.3 inches of water during opening of the Unit 2 RWST hatch cover and 2B SI Pump room door. This will satisfy the requirement for the ECCS Pump room to maintain a minimum of -0.25 inches of water with respect to outside.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this does not have an impact on the events which initiate a LOCA or a radioactive release accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not affected since all Technical Specifications were met. All differential pressure requirements were met.

PROCEDURE REVISION

BwOP DO-M5

DESCRIPTION

The purpose of this Procedure Revision was to update the Operating Mechanical Lineups to reflect the changes to the 1B Auxiliary Feedwater (AF) Pump Diesel Oil Level Indicator.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the valves and their positions have been evaluated previously and are being added to the mechanical lineup so Operations personnel can maintain configuration control. This activity has no affect on analyzed accidents or malfunctions.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because it is an administrative change to have the procedure reflect actual plant conditions. Adding new valves to the component lineup checklist cannot create a new accident or malfunction.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

SOFTWARE REVISION

DESCRIPTION

The purpose of this Software Revision was to update the Rector Coolant System (RCS) Leakrate Configuration file on the Plant Process Computer to reflect the replacement of the Unit 1 Steam Generators in refueling outage A1R07. The new Steam Generators had different Hot and Cold Zone volumes.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the Plant Process Computer (PPC) is not an accident initiator and is not used to mitigate the consequences of an accident. The PPC provides additional information to Main Control Room personnel. This change ensured the information concerning the RCS leakrate was accurate.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new equipment was added to the plant. The PPC still functioned per its design. The PPC does not interact with any safety related equipment.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

SPECIAL PROCESS PROCEDURE

SPP 98-138

DESCRIPTION

The purpose of this Special Process Procedure (SPP) was to perform the following: 1) vent the 1A & 1B Auxiliary Feedwater (AF) Pump discharge piping upstream of the 1AF005 valves, 2) perform a pressure test of flow elements 1FE-AF011 through 18 and 3) perform pressure tests of valves 1AF005A, B, C, D, E, F, G, and H.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the special procedure will be performed in Modes 5, 6 or defueled. The AF System will be isolated from the steam generators during the test. There are no accidents that are affected or created by this test.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created since the abnormal lineup with isolation per the 1AF005 valves versus the 1AF004 valve or the 1AF013 valves will not result in components being challenged beyond their design basis.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the test will be performed in Modes where the affected system (AF) is not required to be operable per Technical Specifications.

ENGINEERING REQUEST

9801471 9801496

DESCRIPTION

The purpose of this Engineering Request was to evaluate the installation of freeze seals on the piping downstream from both the Unit 1 and Unit 2 Spent Fuel Heat Exchanger Outlet Valves (1/2FC-8762B) in accordance with Station procedures. The freeze seal provides component isolation from an unisolable portion of the Fuel Pool Cooling (FC) System return header and will be located in the Fuel Pool Cooling System Room on the 401' elevation of the Fuel Handling Building.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since these freeze seals are performed with the opposite Unit's FC System available to support FC cooling requirements. In addition, fuel handling is prohibited during this maintenance activity and the gate from the pool to the transfer canal is closed. System design minimizes the impact on process fluid loss in the event of a freeze seal failure. Makeup for pool water loss is readily available and the resultant dilution of the soluble boron concentration will not impact the bounding conditions for any fuel handling accident.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there is no change in the normal operation of any equipment created by this freeze seal for the mode of operation in which this activity is performed. The opposite Unit's 100% capable FC System remains available to satisfy system cooling and purification functions. The freeze seal installation has been reviewed from a structural, mechanical, and operational standpoint. No new failure modes or mechanisms are created for the affected system.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because these freeze seals do not change any parameters upon which Technical Specifications are based. In the absence of any failures, there are no impacts on fuel pool water level or soluble boron concentration.

UFSAR Draft Revision Package 7-177

DESCRIPTION

The purpose of this UFSAR Draft Revision Package (DRP) was to update the discussion of the emergency personnel air lock to indicate that this air lock can be used for access to and egress from containment during any mode of plant operation. Additionally, this DRP clarified that the equipment staging structure installed adjacent to the emergency personnel air lock is temporary at Byron Station and is permanent at Braidwood Station.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the use of the air lock does not have any impact on the probability of the occurrence of any accident analyzed in the UFSAR. Furthermore, existing provisions to mitigate the consequences of any accident are not affected. The air lock door seals are tested after entry in accordance with approved Station procedures which comply with industry guidelines (NEI 94-01, Revision 0) which have been endorsed (Regulatory Guide 1.163) by the NRC.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the use of the air lock doors does not degrade the structural integrity of the opening. The use of the installed emergency air lock does not create the possibility of an accident or malfunction of a different type.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the use of the emergency personnel air lock will maintain compliance with Technical Specification requirements and the activity does not affect any conditions upon which the Technical Specifications are based.

UFSAR Draft Revision Package 7-011

DESCRIPTION

The purpose of this UFSAR Revision was to revise Figure 9.5-4 to reflect the fact that a check valve is installed in the lube oil supply line to the turbocharger on the Diesel Generators.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the change reflects the as-built condition of the Diesel Generator Lubricating Oil System. No physical or administrative changes are being incorporated which could impact the diesel generators from mitigating the consequences of any accident.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the change to the UFSAR Figure involves no physical change to the system or associated components. The change to the UFSAR Figure will not introduce any new failure modes or mechanisms.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

OUT-OF-SERVICE

950000802, 950000805, 950000807 950000808, 950000809

DESCRIPTION

The purpose of these Out-Of-Services (OOS) was to maintain the spool piece isolation valves on demineralizer resin sluice water and resin sluice lines in the open position during all modes of plant operation, provided the spool pieces were installed.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased as a result of this change. The limiting accidents involving the liquid radwaste system are the release of the contents of either a spend resin storage tank or a boron recycle holdup tank. Postulated events that could release the radioactive inventory of either of these are cracks in the tanks or operator error. The possibility of a small crack formation is not affected by this change. Operator error resulting in a mispositioning of any of the subject valves would not affect either of these accidents. This change does not affect the consequences of either of these accidents. Neither does it affect any equipment that is important to safety.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created since this change does not adversely affect any equipment or system. The subject valves are used to provide spoolpiece isolation. These spoolpieces are installed during all modes of normal dual unit operation. In the event a spoolpiece is required to be removed, its associated isolation valves would be closed with administrative controls. In some cases, demineralized water is provided to a borated system and/or demineralizer vessel via the subject valves. However in all cases, the valves are not needed to provide isolation to prevent boron dilution in any plant component. In these cases, isolation is provided by other valves within the radwaste system in addition to isolation valves within the borated system. Resin sluicing either form a demineralizer vessel or from vessel to vessel is prevented by isolation valves within the system containing the demineralizer vessel. The consequences of a liquid radwaste system leak or a decrease boron concentration of any borated system as a result of this change is bounded by the limiting cases of a spent resin storage tank or boron recycle holdup tank failure and a Chemical and Volume Control System (CVCS) malfunction that results in a decrease in boron concentration in the reactor coolant.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced since this activity does not affect any parameters or components upon which the Technical Specification are based.

PROCEDURE REVISION

BwOP RC-19T1

DESCRIPTION

The purpose of this Procedure Revision was to allow the installation of a Mansell Level Monitoring System to the vent isolation valve for PI404 during the vacuum fill of the Reactor Coolant System (RCS).

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this activity was performed in Mode 5. A Loss of Coolant Accident is not credible in Mode 5.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this activity was performed in Mode 5. The instrument was installed and removed by the procedure. The RCS was restored to the required condition prior to entry into Mode 4.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

MODIFICATION TEST

M20-2-97-204-1 REV. 0

DESCRIPTION

The purpose of this Modification Test was to run parallel power supply wires for the control circuit to ensure that the circuit would work during degraded voltage situations. The extra wire will reduce the voltage drop on the cable; providing more voltage to the circuit. The Modification Test ensures that the cooler's control circuit functions properly following the addition of the redundant wire. This is accomplished by raising the temperature of the temperature switch, 2TS-VA013.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. The cubicle cooler circuit does not provide any accident initiators. The coolers start any time the associated Auxiliary Feedwater (AF) Pump starts regardless of the type of accident the initiates the Safety Injection. The cooler's circuit also functions the same for the transients that start the associated AF Pump. Providing an extra redundant wire will reduce the amount of current and thus decrease the probability of a malfunction of the equipment under degraded voltage conditions. Testing the circuit entails simulating a high temperature at the temperature switch, which is a normal, design condition. Running the cooler for a short period will not exceed any EQ or equipment design temperature limits for the room, therefore, no new accidents or malfunctions are created.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because running the cooler for a short period will not exceed any EQ or equipment design temperature limits for the room, therefore, no new accidents or malfunctions are created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this change does not affect any parameters upon which Technical Specifications are based.

ENGINEERING REQUEST

ER9602389 Temporary Modification 98-0-017

DESCRIPTION

The purpose of this Engineering Request/Temporary Modification (TMOD) was to furnish a source of instrument air to various air operated valves and controllers in the Auxiliary Building during maintenance activities on the Instrument Air System. The TMOD connects two parallel hoses between valve 0IA108 on the 383' elevation to valve 0IA729 on the 364' elevation of the Auxiliary Building.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since this TMOD maintains the normal operation of the system and is a reliable source of Instrument Air supply to the affected Auxiliary Building loads. The Instrument Air System is not an accident initiator. Failure of the Instrument Air System will not increase the probability of an occurrence or the consequences of an accident or malfunction.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there is no change in the normal operation of any equipment created by this TMOD. The TMOD has been reviewed for material compatibility, air quality, air quantity, structural support, and design loading. The TMOD is a reliable source of instrument air to the affected Auxiliary Building loads and no new failure modes are created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this TMOD does not change any parameters or components upon which Technical Specifications are based.

TEMPORARY ALTERATION

98-1-008 98-2-006

DESCRIPTION

The purpose of these Temporary Alterations was to place a temporary sump pump of the same capacity of the combined U1/U2 Auxiliary Building equipment drain sump pumps, to pump sump contents to a local Auxiliary Building floor drain during maintenance.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since this change does not effect any equipment that is important to safety. The Auxiliary Building equipment drain sump pumps are not an accident initiator and do not affect the probability of occurrence or the consequences of an accident or malfunction.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created, since this change does not adversely affect any equipment or system. This activity is installing temporary equipment to replace the normally installed equipment. Equipment function will be maintained.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced since this activity does not affect any parameter or component upon which the Technical Specification are based.

DOCUMENT CHANGE REQUEST

DCR 980043

DESCRIPTION

The purpose of this Document Change Request (DCR) was to bypass certain installed plant filters used for processing liquid radwastes and to use vendor installed equipment for filtration, as needed.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the bypass piping around plant filter housings is built to the same specifications as that of the filter housing itself. The probability of an occurrence of a liquid radwaste system leak or failure being a Condition III event is not affected. The bypass piping around plant filter housings are built to the same specifications as that of the filter housing itself. The probability of an occurrence of a liquid radwaste system leak or failure being a Condition III event is not affected. The bypass piping around plant filter housings are built to the same specifications as that of the filter housing itself. The consequences of a leak from the liquid radwaste system are not increased because any leakage from system components either in the Auxiliary Building or the Radwaste building would drain to floor drain sumps which activate automatically to remove spilled liquid. These sumps also have high level alarms to detect large quantity inputs. Therefore, the likelihood of a leak is not increased by its use during normal liquid radwaste processing activities.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. Bypassing certain installed plant liquid radwaste filters does not adversely affect equipment or systems. Filtration with demineralization will still be provided, as necessary, for liquid radwaste processing using vendor installed equipment. Decontamination factors are still adequate. The processing takes place within a radiologically controlled area. All vendor installed components have shielding provided to limit exposure to personnel. Liquid radwaste will continue to be processed prior to release to limit radioactivity to the environment.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced since this activity will meet all Technical Specification requirements.
ENGINEERING REQUEST

ER9800359

DESCRIPTION

The purpose of this Engineering Request was to install a freeze seal on Essential Service Water (SX) line 2SXC1A-4" to support repair/replacement work on valves 2SX91A and 2SX2183C. These are the 2A Containment Spray (CS) Pump cubicle cooler outlet isolation valve and return isolation valve.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this activity will not have any impact on the initiating events of any accidents analyzed in the UFSAR. The probability of any accident is not increased. In the event of a freeze seal failure, contingency actions have been formulated to stop the leak. In any case, the resulting leak is significantly smaller than the design basis flood break flow. As an additional contingency to a failed freeze plug, valve 2SX015A can be closed. Closing this valve would isolate SX return flow for a number of safety related equipment. Should this contingency be used, the applicable Technical Specifications Action Statements will be entered.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the piping affected by the added freeze plug has been evaluated and found acceptable. Contingency actions have been formulated to isolate leakage in the unlikely event of a failed freeze plug. The SX System function is not altered. The freeze plug does not adversely affect plant equipment or systems as to create the possibility of an accident or a malfunction of a different type than those evaluated in the UFSAR.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because all Technical Specification requirements were met.

DOCUMENT CHANGE REQUEST

DCR 980433

DESCRIPTION

The purpose of this Document Chang Request (DCR) was to add Equipment Piece Numbers (EPNs) to M-51-3B for 0CF14S, the Nalco Scale Inhibitor Injection skid at the Lake Screen House. The DCR also corrected the chemical feed system flow direction flag from out of the Essential Service Water (SX) System to into the SX system. The notation "High Point Vent Valve" is being removed from valves 0SX232A/B and "Vent" is being added to valve 0SX245A/B to clarify the location of the vent valve. These changes are to improve the information available on these drawings for use by plant personnel.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the chemical feed system has no affect on any accident and is not an initiator of any accident previously evaluated. The changes being made are administrative in nature and do not affect equipment in the plant.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because these changes are clarifying the information available to plant personnel. No physical changes to the plant that could create a new accident or malfunction are created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this change is not addressed by any Technical Specification nor can this change affect any Technical Specification.

UFSAR REVISION

UFSAR Draft Revision Package 7-161

DESCRIPTION

The purpose of this UFSAR Revision was to revise the administrative requirements to be taken when a loss of Battery Room Ventilation occurs for the ESF Batteries. These administrative controls limit hydrogen concentration to 2%.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because administrative controls will prevent excessive hydrogen concentration if the normal ventilation system is not operating. All systems were capable of performing their design function.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new equipment was added to the plant. This change allows for administrative controls to maintain hydrogen concentration in the Battery rooms if the normal ventilation system is not functioning.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

SPECIAL PROCESS PROCEDURE

SSP-98-070

DESCRIPTION

The purpose of this Special Process Procedure was to drain and refill the Unit 1 Reactor Coolant System (RCS) during Steam Generator (SG) replacement activities. The procedure replaces the reactor internals after defueling the reactor, drains, the reactor vessel to the bottom of the RCS loops, and refills the refueling cavity to 23 feet after SG replacement is complete. This procedure configures the reactor vessel for support of the SG replacement on Unit 1.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the reactor is defueled and none of the analyzed accidents are relevant with the reactor defueled. With the reactor defueled, the consequences of an accident or malfunction is not changed.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because with the reactor defueled, the manipulation and configuration of the RCS does not create any new accidents or malfunctions not previously analyzed.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

MODIFICATION TEST

M20-1-96-00030

DESCRIPTION

The purpose of this Modification Test was to provide a guideline for the sequence of events and testing that was performed during the initial plant heatup and power ascension to 100% power following replacement of the Unit 1 Steam Generators (SG) in refueling outage A1R07. This test also documented how the SG level instrumentation responded during the initial fill of the secondary side of the SGs and verified the level sensing piping was leak tight at normal system pressure.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this test used installed plant equipment. All plant components were operated per their design. This test verified proper operation of the new SGs.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this test used installed plant equipment. This test verified the new SGs operated per their design. No new equipment was added to the plant during this activity.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

NUCLEAR WORK REQUEST (NWR)

9801040198

DESCRIPTION

The purpose of this the purpose of this Nuclear Work Request was to install a recorder on various points of the 0PR31J Radiation Monitor to evaluate spurious spiking problems.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the consequences of a malfunction to 0PR31J did not change and the monitor was still operable to perform its interlock function. The installation of the recorder did not affect the radiation monitor. The recorder just monitored points on the RM-80 microprocessor.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the 0PR31J Radiation Monitor operated the same with the recorder installed as it would if the recorder was not installed. The function of 0PR31J Radiation Monitor did not change. The recorder monitored various points on the RM-80 mircroprocessor trying to capture spurious spikes that occurred. The monitor was able to perform its interlock function as required. The installation of the recorder had no affect on the function responding as described in the SAR or the Technical Specification.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

ENGINEERING REQUEST

9801862

DESCRIPTION

The purpose of this Engineering Request was to evaluate abnormal operation of the Auxiliary Building Ventilation (VA) system with the Fuel Handling Building Plenum Exhaust Fans in standby.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the addressed modes of operation will not have any impact on the initiating events of any accidents analyzed in the UFSAR. The VA System is unrelated to the sequence of events leading to the initiation of any accident.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the VA System's accident mitigation and normal functions will be maintained. The VA System is unrelated to the sequence of events leading to the initiation of an accident. There are no radiological concerns since the airflow direction is being maintained, i.e., the airflow is from clean areas to areas of lesser potential for contamination and then into areas of greater potential for contamination.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the operation of the VA System is not affected as demonstrated by successful completion of all Technical Specification requirements.

SPECIAL PROCESS PROCEDURE

SPP 98-138, REV. 1

DESCRIPTION

The purpose of this Special Process Procedure (SPP) was to perform the following: 1) vent the 1A & 1B Auxiliary Feedwater (AF) Pump discharge piping upstream of the 1AF005 valves, 2) perform a pressure test of flow elements 1FE-AF011 through 18 and 3) perform pressure tests of valves 1AF005A, B, C, D, E, F, G, and H.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the special procedure will be performed in Modes 5, 6 or defueled. The AF System will be isolated from the steam generators during the test. There are no accidents that are affected or created by this test.
- The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created since the abnormal lineup with isolation per the 1AF005 valves versus the 1AF004 valve or the 1AF013 valves will not result in components being challenged beyond their design basis.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the test will be performed in Modes where the affected system (AF) is not required to be operable per Technical Specifications.

DOCUMENT CHANGE REQUEST

DCR 980422

DESCRIPTION

The purpose of this Document Change Request (DCR) was to revise P&ID M-72, sheet 1A to delete valve 1SH41 and show valve 2SH244 as open. The P&ID currently shows valve 1SH241 as the vent valve for the suction line of hot water circulating pump 1SH01PB. However, this valve is not installed in the plant. Valve 1SH263 is the installed vent valve for this line. Valve 2SH244 is the isolation valve for 2PI-331. It is currently shown as closed. However, the normal position of the valve is open. Additionally, DCR 980422 revises P&ID M-72, sheet 15 to note that for heater 0SH29AB, the drain valve (0SH413B) and the vent valve (0SH415B) are outside the heater isolation valve boundary, i.e., the configuration is not per the standard configuration shown on M-72, sheet 14. The drawings are being updated to show the as-built configuration of the plant.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, has not changed. The SH system is a non-safety related system. The Auxiliary Building unit heater 0SH29AB and associated drain and vent piping are non-safety related, but are seismically supported so that they cannot adversely affect equipment important to safety. The proposed change revises the drawings to reflect the as-built configuration of the plant.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this change is a documentation change only to ensure that all documentation matches the as-built configuration of the plant. The Station Heat (SH) System is a non-safety related system. The unit heater and its associated vent and drain lines are seismically supported. Valves 0SH413B and 0SH415B are closed during normal operation. Alternate methods will be used to drain and vent the heater 0SH29AB. The suction line is vented through valve 1SH263. With valve 2SH244 closed, suction pressure indicator 2PI-SH331 would not provide indication. Therefore, plant operation is not affected. There are no changed interactions with other SSCs. The proposed activity will not affect equipment failures. No new failure modes are created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the function of the SH system has not changed. This change is a documentation change only to ensure that all documentation matches the as-built configuration of the plant. This activity does not affect any parameters upon which the Technical Specifications are based.

BwAR 1(2)-7-A7, B7, C7, D7

DESCRIPTION

The purpose of these Procedure Revisions was to allow isolation of Primary Water (PW) to the Reactor Coolant Pump (RCP) standpipe by closing 1(2)PW005 and/or 1(2)RY8028 to perform RCS leakrate surveillance.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the RCP # 1 and # 2 seal reliability are not reduced by the isolation of the PW to the RCP standpipes. The standpipes are connected downstream of the RCP # 2 seal. The RCPs and the Pressurizer Relief Tank (PRT) will perform their design safety functions during the periods the PW makeup to the standpipes is isolated. The consequences of a locked RCP rotor accident or any other chapter 15 accident are not effected because the RCP # 1 and # 2 seal integrity and the PRT operation are not affected by the isolation of PW. All safety related equipment expected to function during these accidents are operable and are not affected by the PW isolation. The probability of a malfunction of safety related equipment is not increased by the isolation of PW because RCP is not expected to function during an accident. The RCP seal is expected to function during an accident but the # 1 and # 2 seals are not negatively impacted by the PW isolation. During an accident, the PW isolation valves are expected to close. Thus, with the PW isolation valves already closed, the probability of a malfunction is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because isolating PW to the RCP standpipes and the PRT does not negatively impact the operation of the RCP # 1 and # 2 seals. The seals still perform their primary purpose as a pressure boundary regardless is PW is available or not. Thus, a malfunction does not create any new unanalyzed accidents or malfunctions.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

NUCLEAR WORK REQUEST (NWR)

980105946

DESCRIPTION

The purpose of this Nuclear Work Request was to route electrical cable through Doors D-305 and D-306 (Unit 1 and 2 containment chiller equipment rooms) in order to install TMOD 98-1-017. These doors were propped open to allow the cable to pass through the door opening. The doors were open at the same time that the Auxiliary Building Ventilation (VA) System could be operating in either the two-fan (one supply and one exhaust fan) or abnormal (booster fan only) mode of operation.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the VA System does not initiate or alter the initial conditions of any incident. The ability of the VA System to maintain a minimum negative pressure relative to the atmosphere, control post-accident radioactivity from leaking ECCS equipment, and minimize the release of airborne radioactivity from the Auxiliary and Fuel Handling Buildings will not be adversely affected. Auxiliary Building temperature/ALARA concerns were evaluated due to lower air flows resulting from 2-fan or booster fan only operation. These modes of operation apply to the containment chiller rooms of both Units. Opening the doors to the containment chiller rooms for an extended period of time would have no adverse affect under booster fan operation since there would be no air flow into this room.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the VA System is not related to the sequence of events leading up to the initiation of an accident. The VA System will still be able to perform its design function during normal, abnormal, and accident modes of operation.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR REVISION

UFSAR Draft Revision Package 8-004

DESCRIPTION

The purpose of this Draft Revision Package was to reflect the current configuration of the 345kV transmission lines entering Braidwood Station. The previous configuration identified 345kV transmission lines entering the Station from LaSalle County Station, East Frankfort Substation, Davis Creek Substation and Burnham Substation. Subsequent modifications to the ComEd transmission network have sectionalized the line originally continuing to the Burnham Substation. This line now terminates at the Davis Creek Substation. UFSAR Figures 8.2-5, 8.2-6, 8.2-7 are being revised to remove the references to the Burnham Substation and show the subject transmission line terminating at the Davis Creek Substation. Additionally, the text in UFSAR Section 8.2.1 is being revised to remove the references to the line originally continuing to the Burnham Substation.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since sectionalizing the subject line at the Davis Creek Substation does not affect the function of the offsite power supply system and the switchyard. The subject change also reduces the possibility of another transmission line failure interacting with a transmission line entering the Station by sectionalizing the subject line at the Davis Creek Substation, such that it no longer passes under other transmission lines.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because offsite power continues to enter the Station and energize the ring buses via three separate right of ways. Existing accident analyses currently consider a loss of offsite power concurrent with the accident. In the event of a loss of offsite power, power to operate the required Safety Category I equipment is supplied by alternate Safety Related power sources.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this change does not affect any parameters or components upon which the Technical Specifications are based.

DOCUMENT CHANGE REQUEST

980452

DESCRIPTION

The purpose of this Document Change Request (DCR) was to revise M-43 sheet 1 to correct an invalid EPN and to revise M-72 sheet 1A to replace a valve that was erroneously removed during the last revision.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the Station Heat (SH) and the Non-Essential Service Water (WS) Systems are nonsafety related systems. They are not required to mitigate any UFSAR related accidents. Additionally, these systems do not initiate or alter the initial conditions of any accidents. Revision of the P&IDs has no impact on any UFSAR related accidents (document change only, no physical change to the plant).
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the SH and the WS Systems are non-safety related systems. The changes are documentation only and do not affect the physical configuration of the system of the plant. Based on the above, there is no adverse impact on equipment important to safety, nor an increase in the probability of malfunction of equipment which would challenge safety related equipment.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

MODIFICATION TEST

E20-0-96-301-006-1 E20-0-95-252-1 E20-0-96-242-2

DESCRIPTION

The purpose of these Modification Tests was to test of the Auxiliary Building Ventilation (VA) System main supply fan, 0VA01CB. This test verified proper installation on new forged blade assemblies, new inner-fairing cover plate, and modified screen fasteners.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because only existing approved Station procedures were used to test the system. The VA System was tested in an acceptable lineup that is already acceptable per the UFSAR and Technical Specifications.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this type of testing of the VA System does not have an impact on the events which initiate a Loss of Coolant Accident or a radioactive release accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

MODIFICATION TESTING

E20-0-96-301-003-1 E20-0-95-252-1

DESCRIPTION

The purpose of these Modification Tests was to test of the Auxiliary Building Ventilation (VA) System main supply fan, 0VA01CA. This test verified proper installation on new forged blade assemblies, new inner-fairing cover plate, and modified screen fasteners.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because only existing approved Station procedures were used to test the system. The VA System was tested in an acceptable lineup that is already acceptable per the UFSAR and Technical Specifications.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this type of testing of the VA System does not have an impact on the events which initiate a Loss of Coolant Accident or a radioactive release accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

PLANT BARRIER IMPAIRMENT

DESCRIPTION

The purpose of this Plant Barrier Impairment was to allow maintenance personnel to open the U-2 curved wall door, D-346, to allow routing hoses for repairs on the 2WM210A valve.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the Auxiliary Building will be required to maintain at least -0.3 inches of water during valve repairs. This will satisfy the requirement for the ECCS Pump rooms to maintain a minimum of -0.25 inches of water with respect to the outside pressure.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this activity does not have any impact on the events which initiate a Loss of Coolant Accident or a radioactive release accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

BwOP RC-19, Revision 1

DESCRIPTION

The purpose of this Procedure Revision was to perform a new method of filling the Reactor Coolant System (RCS) piping after it has been drained during an outage. Revision 1 included an option to perform the RCS vacuum fill procedure on the isolated RCS loop in plant mode 5 or 6.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. The evaluation addresses the impact on RCS pressure boundary, reactivity control, core cooling safety systems, structural loading and piping loads, vacuum system exhaust, and RCS inventory industry experience. No changes result to any initiating conditions for any accidents analyzed in the UFSAR.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. The vacuum drawn on the isolated RCS loops and the vacuum drawn on the pressurizer volume will enhance the RCS filling operation. A new alternate procedure for forming an air bubble in the pressurizer is used since the vacuum venting process removes most of the air and a bubble can be drawn requiring minimal letdown. The proposed new procedures do not impact the operation of any safety related systems. The RCS pressure boundary, reactor coolant inventory, core cooling, core reactivity, and the operation of the Residual Heat Removal (RHR) System will not be affected. The stresses experienced by the RCS piping under the vacuum conditions are significantly smaller than the stresses experienced during normal operating conditions. The RCS overpressure protection at low temperature will be maintained as required by the plant Technical Specifications. If the vacuum vent skid were to fail, the RCS piping of the isolated loop and the pressurizer air space would return to atmospheric pressure conditions.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR REVISION

UFSAR Draft Revision Package 7-156

DESCRIPTION

The purpose of this UFSAR Revision was to clarify the correct sample point for obtaining a containment sump sample under post accident conditions. Current procedures and the UFSAR described the sample point as the containment floor drain sump sample point. This change corrected the description to the recirculation sump sample that was obtained using the Residual Heat Removal (RHR) sample point when RHR was in recirculation mode.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because provisions are maintained for sampling the containment water inventory under post accident conditions.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because these changes apply only after an accident has been initiated. The changes affect the post accident sampling program.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based. The post accident sampling program is still maintained and implemented as required by the Technical Specifications.

MODIFICATION TEST

E20-1-97-312-01

DESCRIPTION

The purpose of this Modification Test was to change the trim and stroke length of the eight Unit 1 air operated Auxiliary Feedwater (AF) flow control valves. These changes were necessary to ensure that the AF System meets the design flow requirements in all design bases. A similar design change was installed and tested on Unit 2. The modification test verifies the following: 1) performance of the motor and diesel driven AF Pumps, 2) single and dual branch line flows through the control valves in their failed open position are within the limits required to meet the most limiting accident conditions, and 3) the control valves can be stroked from the control room with the AF Pumps operating in the recirculation mode. The test will be performed in Mode 5, 6 or Defueled when the AF System is not required operable.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because in modes 5, 6 or defueled, when the modification test will be performed, there are no consequences to any of the accidents requiring the AF System except the "Loss of Nonemergency AC Power to the Plant Auxiliaries", "Steam Generator Tube Rupture" and "Loss of Coolant Accidents Resulting From a Spectrum of Postulated Piping Breaks Within the Reactor Coolant Pressure Boundary". For these 3 accidents, the AF System would not be used for mitigation. The Loss of Coolant Accident and Steam Generator Tube Rupture would be addressed using the ECCS System. The Loss of Nonemergency AC Power would be dealt with using features of the Auxiliary Power System. Therefore, having the AF System in an abnormal configuration for testing purposes would not increase the consequences of these accidents should they occur.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the modification test will flow water to the Steam Generators from the AF System during shutdown or refueling conditions. The secondary side of the Steam Generators will be protected as follows: 1) Steam Generator pressure and temperature limitations will be followed as described in TRM 3.7.a, 2) Chemistry will be notified prior to adding water to the Steam Generators to ensure secondary side water chemistry issues or concerns are addressed, and 3) the test will be stopped if any Steam Generator wide level reaches 95% to prevent putting water into the Main Steam lines. The reactivity change to the primary side of the plant associated with adding cold water to the secondary side of the Steam Generators will not pose a challenge to the shutdown margin.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameter upon which the Technical Specifications are based.

DOCUMENT CHANGE REQUEST

980445

DESCRIPTION

The purpose of this Document Change Request (DCR) was to revise P&ID M-65 sheet 6 to reflect the normal position for valves 0AB8598A and 0AB8598B as Open. P&ID M-65 sheet 6 is incorporated in the UFSAR as Figure 9.3-5 page 10.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since this drawing change is a documentation change only to reflect the as-built condition of the plant. No physical or other administrative changes such as procedure revisions are required to incorporate the change, and as such this change does not affect the normal operation of the Boric Acid System.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there is no change in the normal operation of any equipment created by this drawing change and no new failure modes are introduced. This is an administrative change only to reflect the as-built condition of the plant.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which Technical Specifications are based.

SETPOINT CHANGE

SSCR 98-039

DESCRIPTION

The purpose of this Setpoint Change was to rescale the Delta-T/Tave Loop 1A Cold Leg instrumentation for the replacement of the Resistance Temperature Detector (RTD) in support of Exempt Change E20-1-97-270.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this activity performs only rescaling of Delta-T/Tave Loop 1A to reflect the new RTD being installed, specifically the temperature versus resistance characteristics. This activity does not change the function and/or operation of this loop. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment has not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this activity performs only rescaling of Delta-T/Tave Loop 1A to reflect the new RTD being installed; specifically the temperature versus resistance characteristics. This activity does not change the function and/or operation of this loop. Therefore, the possibility for an accident or malfunction of a different type has not increased.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameter upon which the Technical Specifications are based.

DESIGN CHANGE TEST

E20-1-97-202-1

DESCRIPTION

The purpose of this Design Change Test was to verify proper operation of newly installed switches (with new setpoints) in the Component Cooling Water (CC) return line from the Reactor Cooling Pump (RCP) thermal barriers. Manual and automatic functions of valve MOV 1CC685 will be verified, and the undesirable closure of valve 1CC685 upon start of a second CC Pump will be verified to be corrected.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the temporary loss of CC flow through the thermal barriers of the RCPs does not affect operation of the RCPs. The overall CC System will be operated per normal operating procedures. Deliberate cycling of 1CC685 will be done with no RCPs operating.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the Component Cooling Water System design, functions, and operation remain unaffected by the performance of this test. Loss of CC flow to the RCP thermal barriers is an analyzed transient.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the function and operation of the CC System is not changed by the performance of this test.

FDRP 18-011

DESCRIPTION

The purpose of this FPR Draft Revision Package (FDRP) was to reflect the presence of combustible liquid solutions containing hydrazine and amine. These solutions are contained in storage tanks, pumps, and associated piping that were previously installed per plant modification M20-1-87-113 and M20-2-87-009. The proposed activity is a documentation change to revise the FPR to reflect the presence of combustible liquids in fire zones 8.2-1 and 8.3-1.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. Analysis has been performed to show that a fire in either zone where these chemicals are present does not affect the ability to safely shutdown the plant. Since the credited equipment will remain operable to perform the intended safety function, the probability of a malfunction of equipment important to safety is unchanged. Since the system is properly designed and installed, the probability of the accident (i.e. fire) is not increased. All of the design features provide adequate controls to conclude that the probability of a fire is not increased by the introduction of these chemicals into the plant. Since the fire does not change the conclusions of the FPR fire hazards analyses for these fire zones and the ability to safely shutdown the plant is not adversely affected, the consequences of a malfunction of equipment important to safety do not increase.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because in the event of a spill of these materials and a fire, the additional fire severity is only about 90 seconds and has no adverse impact on the design basis fire or conclusions as stated in the FPR fire hazards analyses for fire zones 8.2-1 and 8.3-1.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced since the change does not affect any parameters upon which the Technical Specifications are based.

ENGINEERING REQUEST

ER 9801462 ER 9801463

DESCRIPTION

The purpose of these Engineering Requests was to evaluate the installation of a temporary freeze seal on the Essential Service Water (SX) supply lines to the Auxiliary Feedwater (AF) Pumps. The AF trains will be out-of-service. The freeze seals have only been evaluated for installation during Modes 4, 5 or 6.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the affected piping has been found to remain seismically qualified with the additional weight of the freeze seal assembly. Leakage from an unlikely freeze seal failure should be minimal and bounded by the flooding analysis. Leakage would have negligible impact on overall SX flow.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the freeze seal has the same effect on plant operation as closing valves 2AF017A and 2SX2103A for the 2A AF train and closing valves 2AF017B and 2SX173 for the 2B AF train. The AF trains are not required in modes 4, 5 or 6.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

FDRP 18-060

DESCRIPTION

The purpose of this FPR Draft Revision Package (FDRP) was to revise the Fire Protection Report Fire Hazards Analysis in Section 2.3 and combustible loading Table 2.2-3 to describe the occupancy of this room/fire zone as a Hot Tool Room. The typical storage in this room consists of up to 300 pounds of plastic, 1,000 pounds of rubber, and 400 pounds of nylon. Examples of items being stored are rubber hoses, electric extension cords, nylon slings, plastic parts bins, and nylon rope. These tools are dedicated for use in radiological controlled areas accessible from the Auxiliary Building. The addition of these combustibles will increase the calculated fire loading for fire zone 11.6E-0.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. The change of adding the combustible tool storage does not affect the probability of a design basis fire. The change does not add an ignition source and the commodities are stored in a controlled, approved manner. The addition of these combustibles does not change the results or conclusions of the design basis fire.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there are no new or different events created as a result of the presence of the combustible tool materials in fore zone 11.6E-0.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the function of the safety-related structure, systems, and components is not changed by the presence of combustible tool materials in fire zone 11.6E-0. This activity does not affect any parameters upon which the Technical Specifications are based.

FDRP 18-033

DESCRIPTION

The purpose of this FPR Draft Revision Package (FDRP) was to revise the Fire Hazards Analysis in Section 2.3 and combustible loading in FPR Table 2.2-3 to describe the flammable liquid storage cabinets containing various flammable or combustible liquids. The changes to the FPR affect fire zones 11.5-0, 11.6-0 and 11.6E-0. The addition of these cabinets will slightly increase the calculated fire loading for fire zones 11.5-0 and 11.6E-0 and slightly decrease in fire zone 11.6-0 since less flammable liquids are present than previously evaluated.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. The change of adding the flammable liquid cabinets does not affect the probability of a design basis fire. The change does not add an ignition source and the flammable liquids are stored in approved primary containers and Underwriters Laboratories listed or Factory Mutual approved storage cabinets that protect the contents and prevent them from being the initiator of a design basis fire. A fire involving these storage cabinets does not adversely affect safe shutdown capability.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there are no new or different events created as a result of the presence of the flammable liquid storage cabinets.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the function of the safety-related structure, systems, and components is not changed by the flammable liquid storage cabinet installations. The activity does not affect any parameters upon which the Technical Specifications are based.

FDRP 18-009

DESCRIPTION

The purpose of this FPR Draft Revision Package (FDRP) was to reflect the presence of two outdoor non-safety related transformers that are within 50 feet of safety-related SSCs. The transformers supply off-site power to the Illinois Department of Nuclear Safety and Maintenance Modification Contractor Office facilities. Also, the transformers may be used to supply temporary power as needed during times of need such as refuel outages.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the transformers are located outdoors with adequate separation provided by distance and 3-hour fire rated construction of barriers. A fire involving these transformers does not adversely affect safe shutdown capability.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there are no new or different events created as a result of the transformer installations.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the function of the safety-related structure, systems, and components is not changed by the transformer installations. This activity does not affect any parameters upon which Technical Specifications are based.

BwRP 5820-5T1

DESCRIPTION

The purpose of this Procedure Revision was to change the alert and high alarm setpoints on 1AR011 and 1AR012 (Containment Fuel Handling Incident Area Radiation Monitors). The area radiation monitor setpoints were set to detect a submersion dose rate of 10 mR/hr above background.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the setpoint changes are digital in nature and operate exactly as before the setpoint changes.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the setpoint changes are digital in nature and operate exactly as before the setpoint change.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameter upon which the Technical Specifications are based.

BwVP 850-7

DESCRIPTION

The purpose of this Procedure Revision was to accurately reflect some of the new design features and limits associated with the new Steam Generators on Unit 1 as they are different than the originals.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the procedure revision will track the new Steam Generators design features and limits such that they will not be exceeded. The procedure flags operational transient concerns, prior to a parameter reaching a value of one, thereby keeping the Steam Generator within its design limits. This keeps the Steam Generator in a condition such that it can remain capable of performing as expected and as evaluated by the Steam Generator replacement project. Since the new Steam Generators have been proven to be acceptable for use, maintaining them within design basis cannot increase the probability or consequences of an accident.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the procedure revision only tracks approved design features or limits for the new Steam Generators, which have been rigorously analyzed prior to installation. Tracking these limits cannot contribute to any accident or malfunction.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameter upon which the Technical Specifications are based.

1BwCB Figures 12 and 14

DESCRIPTION

The purpose of these Procedure Revisions was to update the Unit 1 Curve Book "Boron Dilution Rate Nomograph" and "Boron Addition Rate Nomograph" figures to reflect the replacement of the Unit 1 Steam Generators (SG) in refueling outage A1R07. The new SGs had an affect on the Total Reactor Coolant System (RCS) volume which affects the dilution and boration rates of the RCS.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because these procedure changes provided the operators with the proper information to control reactivity changes with boron dilution or boron addition. This ensured the plant remained within the assumptions of the accident analysis. All plant systems were still operated as per their design.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this is an administrative change to have the procedures reflect actual plant conditions. This activity provided the operators with the correct data for boron addition or boron dilution. All plant systems were operated as per their design.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

BwHP 4006-081

DESCRIPTION

The purpose of this Procedure Revision was to incorporate placing the Radwaste and Remote Shutdown Control Room HVAC System in a unique alignment. This alignment allowed the Radwaste and Remote Shutdown Control Room to be ventilated and maintained under positive pressure during work on the shutdown control room ventilation system.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this activity has no affect on how the plant is operated and there is no affect to any system that could cause an increase in off-site dose.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the radwaste and remote shutdown control room area will still be kept positive with respect to the Auxiliary Building and ventilation is provided to control temperature.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameter upon which the Technical Specifications are based.

ENGINEERING REQUEST

ER9801832

DESCRIPTION

The purpose of this Engineering Request (ER) was to evaluate the removal of the manual gear operator from valve 1SX254. A mechanical block was also evaluated for additional margin to maintain the valve open with its operator removed. This activity was required to perform inspection and re-greasing work on the valve operator.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. The removal of the manual gear operator from valve 1SX254 does not have any impact on the initiating events of any accident analyzed in the UFSAR. Valve 1SX254 will remain open. The force acting to close the valve is more than compensated by the force due to the system operating pressure (which acts to open the valve) and by the valve packing friction. Additionally, a friction type mechanical block (split pipe clamped around the valve shaft) was added. The impact of removing the gear operator on the piping subsystem has been reviewed and the seismic qualification of piping subsystem is not compromised.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. The affected Essential Service Water (SX) piping has been found to be acceptable with the removed weight and the valve remains open during the maintenance activities. The operation of the SX System is not altered.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced. The parameters upon which the margin of safety of any Technical Specification is based are not affected.

TEMPORARY MODIFICATION

98-2-015

DESCRIPTION

The purpose of Temporary Modification (TMOD) 98-2-015 was to install ultrasonic feedwater flow instrumentation upstream of the flow venturis in the Unit 2 Steam Tunnel. The brackets for the ultrasonic transducers require the removal of approximately 3 feet of insulation to support their installation and scaffolding installed to access the affected lines. Data acquisition equipment will be located near the transducer brackets on a portable cabinet or cart. Installation of the transducer bracket and interconnecting data acquisition equipment is controlled under this TMOD.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since this TMOD maintains the normal operation of the system, is non-intrusive, and there is no impact on any interfacing equipment or components.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there is no change in the normal operation of any equipment created by this TMOD. The TMOD has been reviewed for potential impact due to material compatibility, seismic, mechanical, thermal, environmental, and emitted radiation (electromagnetic) source considerations. No new failure modes or mechanisms are introduced by this TMOD.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this TMOD does not change any parameters upon which Technical Specifications are based.

CORE RELOAD DESIGN

Unit 1, Cycle 8

DESCRIPTION

The purpose of the Core Reload Design was to evaluate operation of Unit 1 Cycle 8 up to a core average burnup of 15,000 MWD/MTU.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the core design, including consideration of the effects of the changes, will continue to meet key safety parameter limits. All design and performance criteria will continue to be met and no new failure modes or limiting single failure mechanisms have been created nor will the core operate in excess of pertinent design basis operating limits for the key safety parameters. The demonstrated adherence to these standards and criteria precludes new risks to components and systems that could introduce a new type of accident.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the core design, including consideration of the effects of the changes, will continue to meet key safety parameter limits. All design and performance criteria will continue to be met and no new failure modes or limiting single failure mechanisms have been created nor will the core operate in excess of pertinent design basis operating limits for the key safety parameters. The demonstrated adherence to these standards and criteria precludes new risks to components and systems that could introduce a new type of accident.
- 3 The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because each of the Technical Specifications and Technical Requirements Manual Limiting Conditions for Operation were reviewed to determine the impact of the core design on the acceptance limits/margin of safety. Operation of Unit 1 Cycle 8, with the introduction of new fuel has been analyzed in accordance with NRC approved methodologies. The core has been designed to operate within safety analysis acceptance limits and will therefore maintain safety margins.

FDRP 18-027

DESCRIPTION

The purpose of this FPR Draft Revision Package (FDRP) was to revise the Fire Protection Report to show slightly increased combustible loadings due to additional cable insulation in Turbine Building zones 8.3-1 and 8.5-1.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the additional cable insulation in the turbine building does not affect the probability of a design basis fire. The change does not add an ignition source. The cables have appropriate overcurrent protective devices at the source. The existing fire detection and suppression capabilities are not adversely affected by the change. The added cable insulation load does not change the results or conclusions of the design basis fire evaluation. Turbine building components will not be affected differently than previously analyzed.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the increase in fire loading of the turbine building zones does not result in total combustible loading in excess of that already analyzed. The increases are insignificant with respect to the total zone loads and do not cause detection or suppression functions to be challenged differently. No safe shutdown equipment is associated with these zones.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters or components upon which the Technical Specifications are based.

BwVS 500-6

DESCRIPTION

The purpose of this Procedure Revision was to make the following changes to the Low Power Physics Testing and Dynamic Rod Worth procedure: modified the administrative abort criteria for dilution to criticality, modified the dilution to critical process, incorporated references to Improved Technical Specifications, eliminated the Digital Rod Position Indication contingency steps, and incorporated the limitations when personnel are in containment.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because no plant configuration change was made since no physical changes were made to the plant. No procedural changes were made which would cause existing plant equipment to be operated outside of its currently analyzed condition.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no changes to plant equipment or how they are operated were made. The plant was still operated in accordance with the existing Technical Specifications and Safety Analysis.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.
ENGINEERING REQUEST

ER9802064

DESCRIPTION

The purpose of this Engineering Request (ER) was to evaluate the temporary installation of two freeze seals on the 1/1/2" Reactor Coolant Loop B Equalization Line during modes 5 or 6. The freeze seals provide flow isolation for repairing a leak at the orifice flange gasket connection. The orifice flanges house the flow orifice and the flow elements.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. The piping has been qualified for the weight of the freeze jacket, and failure of the pipe due to freezing is not expected. Any potential leakage due to failure of the freeze seals can be minimized by operator actions to depressurize the Reactor Coolant System (RCS) and isolate the loop stop valves. Potential flooding or dose release due to failure of the freeze seals is bounded by design basis analyses. The RCS inventory will be maintained to cover the reactor core and all RCS loops will remain operable to maintain the RCS pressure and temperature.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. The affected piping is seismically supported and the pipe stress due to the addition of the freeze seals is within the design limit. The RCS loop 'B' hot leg and cold leg stop valves are kept open, while the equalization isolation valve is closed, to maintain the temperature of the cold leg piping. In the unlikely event of a failed freeze seal, a contingency plan is in place to isolate the RCS 'B' loop to minimize RCS inventory loss. The piping configuration precludes the coolant level in the reactor vessel to be drained below the fuel assemblies. Further, the amount of leakage from a failed freeze will be accommodated by the Containment floor drain system and is bounded by existing flooding and dose analysis.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the change does not affect any parameters upon which Technical Specifications are based.

NUCLEAR WORK REQUEST (NWR)

980005248

DESCRIPTION

The purpose of this Nuclear Work Request was to install equipment in the Auxiliary Building Floor Drain Sump Pump room to clean the Auxiliary Building Floor Drain Sump. To perform this work, the flood seal for the 1A/2A Essential Service Water (SX) Pump room had to be removed to allow the routing of hoses. The flood seal is considered to be part of the ventilation boundary.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the flood seal removal will not affect any safety related equipment form a ventilation boundary perspective. The Auxiliary Building Ventilation (VA) System will still meet its intended functions, thus all other safety related equipment will not be affected from ventilation concerns. Therefore, the removal of the flood seal will not increase the probability of a malfunction of equipment important to safety. The removal of the flood seal will have no affect on the malfunction of equipment important to safety since the compensatory measures required by the SAR for evaluating a potential fire barrier (i.e. flood seal) will be implemented as part of the removal under the Plant Barrier Impairment program. Appropriate administrative controls will be implemented before removing the flood seal to ensure adequate flood protection for the SX Pump rooms. The probability of a safety equipment malfunction due to a flooding event is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the operation of plant safety related equipment required to mitigate the consequences of a malfunction of equipment important to safety will not be degraded due to ventilation concerns. There is no increase in the consequences of an equipment malfunction since no new assumptions are being made with regard to the reliance on equipment or equipment performance.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

ENGINEERING REQUEST

ER9801710

DESCRIPTION

The purpose of this Engineering Request was to evaluate the installation of a freeze seal on the downsteam piping from relief valve 1CC9420 in accordance with Station procedures. Relief valve 1CC9420 protects the shell side of the Unit 1 High Radiation Sampling System (HRSS) Sample Panel heat exchangers from over-pressurization. The freeze seal provides component isolation form an unisolable portion of the Component Cooling (CC) System return header.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the freeze seal is performed using industry proven methodology on a 1" line with little likelihood of failure. The failure of the affected line is within the limiting fault of a 30" Non-Essential Service Water (WS) line leak on the general floor area of the 383 foot elevation.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there is no change in the normal operation of any equipment created by this freeze seal for any mode of operation in which this activity is performed. The freeze seal installation has been reviewed from a structural, mechanical, and operational standpoint. No new failure modes or mechanisms are created for the affected system.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this freeze seal does not change any parameters upon which Technical Specifications are based.

SPP 98-062

DESCRIPTION

The purpose of this Special Process Procedure was to measure the Steam Generator Blowdown System flow rate following the replacement of the Unit 1 Steam Generators in refueling outage A1R07.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this test used installed plant equipment. The equipment was operated in accordance with its design function.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this test used installed plant equipment. No new equipment was added to the plant.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications area based.

98-049

DESCRIPTION

The purpose of this Special Process Procedure (SPP) was to initiate a rapid load reduction using the DEHC turbine controls of 10% of rated capacity and a rate of 200%/min. The plant response was monitored with permanent plant equipment and temporary chart recorders. The plant was in a steady state condition with major control systems in automatic mode and reactor power greater than 30%. The plant was stabilized after the reduction at the lower power level. This test was used to demonstrate the ability of the plant to sustain a 10% rapid load reduction following the installation of the Unit 1 replacement Steam Generators.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because none of the analyzed accidents are effected by this procedure. The test performs designed plant operations and does not alter any plant SSCs. The test demonstrates the ability of the plant to withstand a rapid load reduction within design parameters. If the plant is not able to perform as designed, the plant would trip. A plant trip is bounded by the SAR analyzed accidents.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the test incorporates permanently installed plant equipment and temporary recorders to monitor plant responses. If the temporary recorders fail, plant control systems may be affected, but not any of the protection systems. However, such failures are bounded by the SAR analyzed accidents.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

SPP 98-048

DESCRIPTION

The purpose of this Special Process Procedure (SPP) was to initiate a rapid load reduction using the DEHC turbine controls of 25% of rated capacity and a rate of 200%/min. The plant response was monitored with permanent plant equipment and temporary chart recorders. The plant was in a steady state condition with major control systems in automatic mode and reactor power greater than 30%. The plant was stabilized after the reduction at the lower power level. This test was used to demonstrate the ability of the plant to sustain a 25% rapid load reduction following the installation of the Unit 1 replacement Steam Generators.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because none of the analyzed accidents are effected by this procedure. The test performs designed plant operations and does not alter any plant SSCs. The test demonstrates the ability of the plant to withstand a rapid load reduction within design parameters. If the plant is not able to perform as designed, the plant would trip. A plant trip is bounded by the SAR analyzed accidents.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the test incorporates permanently installed plant equipment and temporary recorders to monitor plant responses. If the temporary recorders fail, plant control systems may be affected, but not any of the protection systems. However, such failures are bounded by the SAR analyzed accidents.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

EXEMPT CHANGE

E20-1-96-226

DESCRIPTION

The purpose of this Exempt Change was to install energy absorbing restraints developed by LISEGA Inc. on the 12" Heater Drain Tank (HDT) rupture disk relief line. In addition a 9" orifice was installed as an integral part of the modified 12" rupture disk holder supplied by BS&B Safety Systems Inc.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the probability of a Main Turbine trip as a result of loss of Main Condenser vacuum due to this installation is not increased. The restraints were designed for installation on the relief line that is routed to the Main Condenser. The 9" orifice that has been installed on the rupture disk holder will reduce potential damage to the subject line in case of a HDT disk rupture and consequently increased the reliability of the Main Condenser. The Main Condenser and the HDT are non-safety related system and they are designed to safety Category II, Quality Group D criteria. There are only minimal radiological consequences associated with the Turbine Trip scenario; therefore, this event is not limiting. The Main condenser and the Heater Drain Tank are not radioactive and they are not required to mitigate the radiological consequences of any UFSAR accidents. These changes take place in the Turbine Building and they do not adversely impact equipment important to safety.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the restraint arrangement was designed to support the 12" HDT rupture disk relief line in case of a transient upon rupture of the subject HDT disk. This would increase the reliability of the relief line and minimize potential damage to the HDT and the Main Condenser connection. However, the restraints are not required to assure the structural integrity of the line. The 9" orifice which has been installed, as an integral part of the rupture disk holder will reduce the transient force developed across the disk if activation has been evaluated and found to be acceptable. Therefore, there is no potential adverse impact on any SSCs important to safety.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

DOCUMENT CHANGE REQUEST

980470

DESCRIPTION

The purpose of this Document Change Request was to change the normal position of Gland Steam (GS) valves 1GS037 and 1GS5000 from open to closed.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since these GS valves are non-safety related and have no interactions with safety related equipment. This is an administrative change to revise a drawing to reflect actual plant conditions.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because a failure of these GS System valves would not change or affect any conditions described in the turbine trip accident. This is an administrative change to revise a drawing to reflect actual plant conditions.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because these GS valves are non-safety related, and do not affect any parameters upon which the Technical Specifications are based.

SPP 98-056

DESCRIPTION

The purpose of this Special Process Procedure was to verify the calibration of the steam flow transmitters in Modes 1 and 3 following the replacement of the Unit 1 Steam Generators in refueling outage A1R07.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this test used installed systems and indications. The plant systems were operated in accordance with their design functions.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this test used installed systems and indications. No new equipment was installed in the plant.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

SPP 98-050

DESCRIPTION

The purpose of this Special Process Procedure was to demonstrate the ability of the Steam Generator (SG) level control system to respond to a mismatch between the SG level and the setpoint. It also demonstrated the ability of the feedwater pump master controller to respond to a small differential pressure transient. This testing was required in Mode 1 to meet the testing requirements of the Steam Generator Replacement Project.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the test only impacted the feedwater control system. The control system was operated in accordance with design features, and is not credited for the mitigation of any accidents or malfunctions of equipment. The reactor trip setpoints were not affected by this test.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no credit is taken for control system operation in any accident analysis. The possible failure modes are bounded by accidents discussed in the UFSAR. Thus, there are no new accidents or malfunctions created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

SPP 98-030

DESCRIPTION

The purpose of this Special Process Procedure was to perform the 10 year pressure test of the Safety Injection (SI) System Loop B and C cold leg injection piping. The piping between check valves 1SI8948A-D, 1SI8819A-D and 1SI8818A-D was pressurized with a portable positive displacement pump to approximately Reactor Coolant System (RCS) pressure and a visual inspection was performed to verify that there was no through wall leakage of the associated piping.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the piping is being pressurized to its normal operating pressure. Although there will be no injection of hydro pump water into the RCS due to a relief valve on the hydro test rig the water being used was at a boron concentration of 2200 to 2400 ppm. This safety relief valve also prevented overpressurization of the associated test line piping.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the Special Process Procedure ensures that personnel are in attendance at the containment isolation vent valve 1SI011 to immediately close it if required. The test volume will be controlled to prevent overpressurization. All other ECCS Systems will remain intact during the test.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

EXEMPT CHANGE

E20-2-96-211

DESCRIPTION

The purpose of this Exempt Change was to replace the computer inverter located in Unit 2 Miscellaneous Electrical Equipment Room (MEER), with a new 10 kVA inverter. This change was intended to increase the reliability of the power supply for the process computer.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this change was intended to increase the reliability of the power supply for the process computer. The loading on the non-safety related buses which supply the inverter will be reduced. This change does not affect the ability of the onsite auxiliary power system to supply power to the loads required for mitigating the consequences of this accident. The process computer provides information related to the plant status during and after this event, but does not control any of the equipment required keep the offsite dose within 10CFR100 limits. No new failure modes for the replacement inverter or the process computer have been identified.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the replacement inverter will interface with its inputs (AC and DC sources) and outputs (plant process computer, annunciators) in the same manner as the existing inverter. The process computers interface with other plant SSCs will not change. The process computer will continue to function as it currently does during normal and abnormal modes of operation. Operations personnel will not change the way in which they use the process computer to perform their tasks. The 20 kVA rating of the replacement inverter is sufficient to supply the current load while accommodating future load growth. The effect of this change on other plant systems has been evaluated and found acceptable.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

PROCEDURE REVISION

BwRP 5820-5T1

DESCRIPTION

The purpose of this Procedure Revision was to change the alert and high alarm setpoints on 1AR011 and 1AR012 (Containment Fuel Handling Incident Area Radiation Monitors). The area radiation monitor setpoints were set to detect a submersion dose rate of 10 mR/hr above background.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the setpoint changes are digital in nature and operate exactly as before the setpoint changes.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the setpoint changes are digital in nature and operate exactly as before the setpoint change.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameter upon which the Technical Specifications are based.

UFSAR REVISION

UFSAR Draft Revision Package 8-003

DESCRIPTION

The purpose of this UFSAR Revision was to revise Figure 2.4-7b to include a new warehouse building (formerly the Steam Generator Replacement Project (SGRP) Decontamination Facility installed by DCP 9600029). The warehouse building is non-safety related.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the new warehouse building was evaluated for potential interactions with SSCs and it was determined that it will not have any adverse affects on them.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there are no new different events created as a result of the new warehouse building.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

PROCEDURE REVISION

BwCP PD-1

DESCRIPTION

The purpose of this Procedure Revision was to revise BwCP PD-1, Braidwood Station Primary Chemistry Surveillance Program to allow for higher Reactor Coolant System (RCS) lithium hydroxide concentration on Unit One during the initial part of the operating cycle. Higher lithium hydroxide concentrations result in a coordinated RCS pH program.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the use of lithium hydroxide has been previously evaluated for use as a pH control agent in the RCS and associated systems. The changes being made do not affect the probability of occurrence or the consequences of an accident or malfunction.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the effect of lithium hydroxide in the RCS and associated systems has been previously evaluated. Westinghouse has evaluated the impact of elevated lithium concentrations at the beginning of core life. Lithium concentrations would be higher in the RCS from the beginning of the cycle until approximately 900 ppm boron remains in RCS. The lithium required to maintain an RCS pH of 7.1 will be the same as the current program.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because Lithium hydroxide is currently approved for use in the RCS for pH control. This activity does not affect any parameters upon which the Technical Specifications are based.

SETPOINT CHANGE

SSCR 98-041

DESCRIPTION

The purpose of this Setpoint Change (SSCR) was to provide the scaling changes required for switching the location of the narrow range RTDs installed in the Loop 1A hot leg positions A1 and A3.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the quick disconnects do not affect the operation of the RTDs and their input onto the Reactor Protection (RPS) and Rod Control Systems. The RTDs provide Reactor Coolant System (RCS) indication for operation of the plant and rod control. There is no impact on the indication provided or on rod control which can cause an accident. The change does not change the response time or RPS actuation in response to an accident. The disconnects do not increase the probability of failure of RCS temperature indication, Rod Control or RPS.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the change does not alter the overall operation of the RTDs and instrument loops. No new failure modes are introduced for the instrument loops.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

SPP 98-057

DESCRIPTION

The purpose of this Special Process Procedure was to record the normal broadband background noise frequency response of the Loose Parts Monitoring System (LPMS) at 0%, 20%, 50%, 75%, and 100% power levels. The test required temporary installation of non-intrusive test equipment. All test equipment was removed after the test, restoring the system to normal. This testing was required to meet the testing requirements of the Steam Generator Replacement Project.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because data collection equipment will be transparent to plant operation. The LPMS is operated in accordance with design features, cannot initiate any accidents analyzed in the UFSAR, and is not credited for the mitigation of any accidents or malfunctions of equipment.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the LPMS operation is not changed as a result of this test. All test equipment attachment was temporary, and the system was restored to normal after the test.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR REVISION

UFSAR Draft Revision Package 8-005

DESCRIPTION

The purpose of this UFSAR Revision was to correct and clarify the design pressures of the Chemical and Volume Control (CV) and Safety Injection (SI) Pump suction lines shown in UFSAR Table 6.3-1 to agree with the plant design. Therefore, this change to the UFSAR Table had no impact on any plant equipment or operation.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the change involves correcting and clarifying design pressures shown in the UFSAR to agree with the plant design. This is an administrative change only.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because correcting design pressures in a UFSAR Table would not change or affect any conditions described in any accident or create a new accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the design pressures listed in the affected UFSAR Table do not affect any parameters upon which the Technical Specifications are based.

EXEMPT CHANGE

001176M-01

DESCRIPTION

The purpose of this Exempt Change was to revise vendor during 706031-2 to add a note specifying the location of the applicable valve stroke values for each of the AF005 valves. These valves in the Auxiliary Feedwater (AF) System were modified with replacement trim packages which affected their stroke times.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this change did not affect any plant equipment. The AF System still meets its design criteria. This change was administrative in nature to have plant drawings reflect actual plant conditions.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new equipment was added to the plant. This was an administrative change to have plant drawings reflect actual plant conditions.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR REVISION

UFSAR Draft Revision Package 7-142

DESCRIPTION

The purpose of this UFSAR Revision was to add the word "minimum" to describe the Residual Heat Removal (RH) suction relief valve capacity characteristics.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the wording changes that explain the RH suction relief valves capacity characteristics do not affect the valve's actual performance. The valves will still perform like they did prior to this change. Therefore there is no change to plant response to an accident or probability of an accident.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the valves are not being changed therefore there are no new malfunctions or different accidents that can occur. The RH suction relief valves are still the same as the evaluated as part of the NSSS package and originally installed in the plant.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

EXEMPT CHANGE

D20-0-98-233

DESCRIPTION

The purpose of this Exempt Change was to install a hydrolase tap on line 0WED8A-3". This allowed hydrolasing of the Auxiliary Building Equipment Floor Drain System and reduces personnel exposure.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because addition of the hydrolase tap has been evaluated in calculation BRW-98-1247-M, Revision 00 and was found acceptable. Addition of the hydrolase tap does not result in any new high or moderate energy line breaks. There is no adverse impact on the structural integrity of the Equipment Floor Drain System. Therefore, there is no increase in the probability of a flood event in the Auxiliary Building or any other the UFSAR accidents. The hydrolase tap does not adversely impact the flood analysis of the Auxiliary Building or the capability to safety shutdown the plant. There is no impact on the probability of malfunction of equipment important to safety as a result of the addition of the hydrolase tap to the Auxiliary Building Equipment Floor Drain System.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the Auxiliary Building Equipment Floor Drain System is a non-safety related Class D system. Addition of the hydrolase tap does not compromise the structural integrity of the system. No adverse interactions with any SSCs important to safety are introduced as a result of the hydrolase tap addition. Based on the above, the hydrolase tap does not create the possibility of an accident or malfunction of a type different from those evaluated in the SAR.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

SETPOINT CHANGE

SCCR 98-020

DESCRIPTION

The purpose of this Setpoint Change was to rescale the Delta-T/Tave Loops 1A, 1B, 1C, and 1D due to RCS Temperature Instrument Alignment results and to rescale Loop 1A, Hot Leg 1A NRA card due to Reactor Coolant System (RCS) Cross Calibration results.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this activity performs only rescaling of Delta-T/Tave Loops to align with the calorimeteric indicated power value. This activity does not change the function and/or operation of these loops. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment has not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this activity performs only rescaling of Delta-T/Tave Loops to align with the calorimeteric indicated power value. This activity does not change the function and/or operation of these loops. Therefore, the possibility for an accident or malfunction of a different type has not increased.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

PROCEDURE REVISION

BwVSR 3.1.2.2-1 BwAP 2361-2 BwVSR 3.3.1.3 BwVSR 3.2.2.1 BwVSR 3.2.1 BwVSR 3.3.1.6

DESCRIPTION

The purpose of these Procedure Revisions was to reflect the replacement of the incore and follow codes used by the Reactor Engineers to verify Technical Specification Surveillance requirements. These changes reflect the use of Best Estimate Analyzer for Core Operations Nuclear (BEACON) methodology.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the BEACON methodology is a software package from Westinghouse. There are no actual physical connections to any of the systems needed to mitigate an accident described in the UFSAR. The software is loaded on a computer that has no safety function. The software monitors the core, it is not connected to any system capable of shutting down the plant or inhibiting that same function.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the BEACON methodology does not create the possibility of an accident or transient different type than any previously evaluated in the safety analysis report because it is a software core monitoring package. Evaluation of the power distribution and core reactivity parameters is performed with the approved BEACON methods. There is no physical connection to any safety related system or any system necessary for the safe shutdown or the plant. The methodology does not change or invalidate accident analysis limits and assumptions presented in the SAR. The possibility of an accident, which is different from any already in the SAR, is not created, because this software package has no safety function or controls any safety system. The BEACON methodology does not alter any of the key safety parameter limits or levels of margin as considered in the reference design basis evaluations. The adherence to these limits and criteria precludes new risks to components and systems that could introduce a new type of accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the BEACON methodology is the tool to calculate these peaking factors and was previously NRC approved. Currently, a fluxmap is processed with a core model of the conditions during the fluxmap and the peaking factor surveillances are completed. This activity does not affect any parameter upon which Technical Specifications are based.

FDRP 18-015

DESCRIPTION

The purpose of this Fire Protection Report (FPR) Revision was to revise page 2.3-167 to state that some structural steel beams that are part of or support the 3-hour rated fire barriers comprising the Diesel Generator (DG) air shafts are not fireproofed. This condition is acceptable since a fire hazard analysis concluded that the worst case potential fire exposure would not raise the temperature of the affected structural steel to the point where their structural integrity is weakened.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because as demonstrated in the fire hazard analysis, a fire will still be contained within the zone (i.e., the fire barrier wall and structural steel assembly will remain in place and the fire will not spread beyond the zone). Therefore, the consequences of a fire are unchanged from the current fire hazards analysis described in the Fire Protection Report.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the fire barriers and structural steel will function as intended and the consequences of a fire in the zone remain unchanged. No new system malfunctions are created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

FDRP 18-035

DESCRIPTION

The purpose of this Fire Protection Report (FPR) Revision was to add two paragraphs to Section 2.1.4.1 to state that door pull handles may be added to some fire doors that have been previously listed by Underwrites Laboratories (UL). The handles are not UL listed. Also, some fire doors may be shimmed with cardboard shims in accordance with door manufacturer instructions. These conditions have been evaluated and determined to not adversely affect the performance of the door in the event of a fire.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the change does not adversely affect the capability of the fire door to remain latched, resist deflection, or prevent fire from extending to the unexposed side of the door. The fire endurance capability of the fire door was not affected and the consequences of a fire as described in the fire hazards analysis remain unchanged.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the fire endurance capability of the door was not impacted by the change. The fire barrier remains intact and the fire is contained within the zone that has been evaluated in the fire hazards analysis.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

FDRP 18-039

DESCRIPTION

The purpose of this Fire Protection Report (FPR) Revision was to add a NFPA code deviation to the FPR for Byron and Braidwood regarding the use of non-Underwriters Laboratories (UL) listed fire hose reels. The deviations were justified since a trained fire brigade uses these hose stations, and the function of the hose reel is basic and requires no special or unusual capability susceptible to failure.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the change does not affect the capability of the hose reel to perform its function of properly storing hose and allowing deployment of hose in the event of a fire. The manual fire fighting capability of the fire brigade was not diminished or inhibited.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because fire hose reels do not impact any plant systems or have the potential to cause any type of accident or different type malfunction. Also, since the manual fire fighting capability was not adversely affected, the consequences of a fire as described in the fire hazards analysis remain unchanged.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

FDRP 18-045

DESCRIPTION

The purpose of this FPR Draft Revision Package (FDRP) was to revise Figures 2.3-15 and 2.3-25 and Section 2.3.11.2 of the Fire Protection Report. These figures were revised to show the Regeneration Waste Drain Tank and Pumps. Section 2.3.11.3 is being revised to correct the number of pumps in Fire Zone 11.2-0 from eight to twelve.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased.
 FDRP 18-045 is a documentation change only. No physical changes to the plant are being implemented by this FDRP. Therefore, the probability of occurrence and the consequences of any accident associated with the affected system and components are not changed by the implementation of this FDRP.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created. There are no plant operational changes, physical changes, or any change that could create new failure modes or mechanisms being incorporated under this FDRP. Therefore, there is no possibility of creating an accident or malfunction different from those evaluated in the UFSAR by the implementation of this FDRP.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this FDRP does not change any parameters upon which Technical Specifications are based.

PROCEDURE REVISION

BwOP VR-M1

DESCRIPTION

The purpose of this Procedure Revision was to correct the Mechanical Lineup to reflect the isolation of the Volume Reduction System from other plant systems. The Volume Reduction System is not used.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the proposed changes have no effect on any equipment that is assumed to function in an accident.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created since the proposed changes will have no impact on safety related equipment.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced since this activity does not affect any parameters upon which the Technical Specifications are based.

DOCUMENT CHANGE REQUEST

DCR 960125

DESCRIPTION

The purpose of this Document Change Request (DCR) was to revise drawings M-58-1, M-55-2D and M-55-2K. These drawings were revised to reflect correct drawing references for the Instrument Air supply to valves 1/2HY023.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the Instrument Air and the Hydrogen Systems are non-safety related, non-radioactive systems. This change is administrative in nature to ensure the drawings reflect actual plant conditions.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there are no physical or functional changes being performed by this activity. This change is administrative in nature to ensure the drawings reflect actual plant conditions.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

PLANT BARRIER IMPAIRMENT

DESCRIPTION

The purpose of this Plant Barrier Impairment was to repair 2SX001B by removing the floor plug FS02-1 for access into the 1B/2B Essential Service Water (SX) Pump room. The floor plug is considered to be part of the ventilation boundary.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the probability of creating an initiating event of Loss of Offsite Power, Loss of Coolant Accident (LOCA) or High Energy Line Break is not affected. Also, opening the doors will not affect any safety related equipment from a ventilation boundary perspective. The Auxiliary Building Ventilation (VA) System will still meet its intended functions, thus all other safety related equipment will not be affected from ventilation concerns. The airflow path essentially remains unchanged, thus VA will continue to function as before and the offsite dose analysis remains the bounding analysis.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this action does not have an impact on the events which initiate a LOCA or a radioactive release accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced since this activity does not affect any parameters upon which the Technical Specifications are based.

TEMPORARY MODIFICATION

98-1-022

DESCRIPTION

The purpose of this Temporary Modification was to bypass the failed heater for sensor #6 of the Train A probe for the Reactor Vessel Level Indicating System (RVLIS). This disabled the remaining heaters in the same circuit and the associated sensors (#2, 4, and 8). A resistor network was installed in place of the failed heater to allow operation of the remaining sensors.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since RVLIS is an accident monitoring system and has no affect on plant normal operations. The RVLIS probe still provided level indication to the operators to determine the progression of an accident and effects of actions to control the accident.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the change does not alter the overall operation of the RVLIS system and does not create any interactions with plant systems. The system is post accident monitoring only and is not used for normal plant operations.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because all Technical Specification requirements were met.

DESIGN CHANGE

D20-2-96-269

DESCRIPTION

The purpose of this Design Change was to remove the Unit 2 Equipment Status Display (ESD) system equipment.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because failure of the affected ESD equipment to function is not an accident initiator for any of the accidents or transients evaluated in the SAR documents. The EDS System is not relied upon to remain functional following design basis events to ensure the integrity of the reactor coolant pressure boundary, the capability to shut down the reactor and maintain it in a safe shutdown condition, or prevent or mitigate the consequences of accidents that could result in potential offsite exposures comparable to the 10 CFR Part 100 guidelines.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because these changes do not 1) alter the function of any other system or components during any plant operating modes, 2) alter any initial conditions or assumptions used in the SAR documents or transient and accident analyses, or 3) create any new failure modes. Therefore, the proposed changes will not create the possibility of an accident or transient than those previously evaluated in the SAR documents.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

DESIGN CHANGE

D20-0-97-001

DESCRIPTION

The purpose of this Design Change was to add an additional Turbine Building intake for the Laboratory Ventilation (VL) System. This new intake included a fire damper, a high energy line break (HELB) isolation damper and security barrier. This change eliminates problems with diesel fumes in the Chemistry Laboratory during Diesel Generator runs.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the VL System is not an accident initiator and is not required to function during any accident. All differential pressure requirements for the Turbine and Auxiliary Buildings were met.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because all differential pressure requirements for the Turbine and Auxiliary Buildings were met. This change did not affect any safety related SSC. The addition of a new intake in the Turbine Building will not create a new accident or malfunction.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

PROCEDURE REVISION

1BwOS CX-M1 2BwOS CX-M1

DESCRIPTION

The purpose of these Procedure Revisions was to reflect the replacement of selected pen and ink strip chart recorders with solid state paperless recorders and a computer data collection system. These changes provided clearer direction for the transfer of recorder data to a compact disk (CD). The changes ensured the procedure can be easily and correctly performed.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the recorders are seismically qualified and compatible with their installed environment. All equipment is seismically installed and meet or exceed the requirements of the previous strip chart recorders. The new recorders were validated and verified by the vendor ISO 9000 program. The consequences of all analyzed accidents is not increased because the recorders do not effect the operation of any safety related equipment assumed to function during the postulated accidents.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the failure modes of the new solid state recorders do not introduce any new failure modes than those previously evaluated with the old strip chart recorders. The new recorder system has adequate redundancy to ensure continuous data collection and operator display capability.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

FDRP 18-074

DESCRIPTION

The purpose of this Fire Protection Report (FPR) Revision was to modify the Fire Hazard Analysis (FHA) for Unit 1 and 2. The scope of this evaluation includes the cumulative affect of multiple fire load changes to a single fire zone. The credited fire barriers were evaluated against the change. In all cases, the net combustible loading change did not impact the adequacy of any existing fire barrier or adversely affect post-fire safe shutdown capability.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the capability to safely shutdown has been demonstrated in the current FPR and Amendment 18 changes for all fire zones using existing Station procedures. Following a design basis fire in any zone, the changes do not introduce any new equipment failure consequence not previously considered in the safe shutdown analysis (SSA). The changes require no mitigating actions that are not currently included in Station procedures for safely shutting down following a design basis fire.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the existing SSA assumes that safe shutdown components physically located within a given fire zone and susceptible to fire damage will be damaged by a fire in that zone. The changes describing increased combustible fire load in a fire zone increases its probability of malfunction to be the complete loss of function in that zone. However, any component (or its cables) that is located in the zone cannot be credited for safe shutdown and are not considered important to safety in that specific fire zone as already analyzed in the SSA. In each case, the change did not result in the redundant component (important for safety) being unavailable or damaged by the fire.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

NUCLEAR WORK REQUEST (NWR)

980122202

DESCRIPTION

The purpose of this NWR and Plant Barrier Impairment was to remove the floor plug for the recycle evaporator condensate demineralizer to repair the 0AB8211 valve. Per the Plant Barrier Impairment Program, a 50.59 evaluation was performed to evaluate the effects on the Auxiliary Building Ventilation (VA) System.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. The new flowpath has been evaluated and has determined that the flowpath is acceptable and will maintain the Auxiliary Building within acceptable limits. Thus no malfunction of equipment important to safety exists.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the function of the VA System will remain unaffected during normal and accident conditions. Therefore, the existing analysis remains the bounding document.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced since the VA System is not changed by the opening of this floor plug.
DOCUMENT CHANGE REQUEST

980434

DESCRIPTION

The purpose of this Document Change Request was to add notes to P&IDs M-105 Sheet 1 and M-106 Sheet 1 to indicate that mechanical blocks are installed to maintain valves 1/2VQ001A/B and 1/2VQ002A/B in the closed position. The mechanical blocks were installed under Design Changes MCR20-1/2-91-676.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the function of the affected equipment is unchanged by this activity. No accident initiating conditions are affected by this activity. This activity does not impact any equipment relied upon to mitigate the consequences of any accidents since the drawing changes only provide notes to reflect the previous installation of valve blocks that maintain containment integrity (maintain valves closed) when installed.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new failure mechanisms or modes are created by this activity. No actual physical changes to the plant are implemented under this activity.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which Technical Specifications are based.

FIRE PROTECTION REPORT (FPR) REVISION

FDRP 18-036

DESCRIPTION

The purpose of this Fire Protection Report Revision was to modify the Safe Shutdown Analysis (SSA) in the Fire Protection Report (FPR) to reflect the results of a cable routing verification review. This review was conducted as part of the Thermalog resolution project. This revision updates the locations cables exist and what fire zones can disable both trains of Main Control Room Ventilation.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this is an administrative change to have the FPR accurately reflect as-built plant conditions. None of these changes are initiators of a design-basis fire.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this is an administrative change to have the FPR accurately reflect as-built plant conditions. No new equipment was added to the plant.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

DOCUMENT CHANGE REQUEST

980493

DESCRIPTION

The purpose of this Document Change Request (DCR) was to revise drawings M-66 sheet 2, M-139 sheet 2 and M-152 sheet 28 to show continuation arrows from the Component Cooling Water (CC) System on drawings M-66 sheet 2 and M-139 sheet 2 to the Heat Radiation Sample Sink Cooler Panel on drawing M-152-28. This is a document change only.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since there are no physical changes being made to the plant. This change is a documentation change only to clarify the CC System supply and return cooling water for PS29J on the drawings by adding continuation arrows.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because plant operation is not affected by this change. There are no changed system interactions. No physical changes are being made to the plant. This change is a documentation change only to clarify the CC System supply and return cooling water for PS29J on the drawings by adding continuation arrows.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because there is no change to the function of the CC or Processing Sampling System. This is an administrative change and does not affect any parameters upon which the Technical Specification are based.

TEMPORARY MODIFICATION

98-1-022 Revision 1

DESCRIPTION

The purpose of this Temporary Modification was to bypass the failed heater for sensor #2 and #6 of the Train A probe for the Reactor Vessel Level Indicating System (RVLIS). The failed heaters disabled the remaining heaters in the same circuit and the associated sensors (#4 and #8). A resistor network was installed in place of the failed heaters to allow operation of the remaining sensors.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because RVLIS is an accident monitoring system and has no affect on plant normal operations. The RVLIS probe still provided level indication to the operators to determine the progression of an accident and effects of actions to control the accident.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the change does not alter the overall operation of the RVLIS system and does not create any interactions with plant systems. The system is post accident monitoring only and is not used for normal plant operations.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because all Technical Specification requirements were met.

SPECIAL PROCESS PROCEDURE

SPP 98-034 SPP 98-035

DESCRIPTION

The purpose of these Special Process Procedures (SPPs) were to test interposing relays PSAF51X1 and PSAF55X in the control circuits for the Auxiliary Feedwater (AF) Essential Service Water (SX) Supply valves. SPP 98-034 tests the Unit 1 valves and SPP 98-035 tests the Unit 2 valves. The normally closed valves (two in series for each AF Pump) isolate SX Supply from the suction of the AF Pumps. The SPPs simulate a low pressure signal by jumpering the pressure switch contact and verifying that the interposing relays energize. The valves will not open on the arming signal alone unless an ESF actuation signal is present. As a precaution, the breaker for one of the two valves being tested will be in the off position to prevent both isolation valves from inadvertently opening at the same time.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the probability of the accidents are tied to the initiating equipment such as steam piping, feedwater components, steam generators, etc. None of this equipment is impacted by this test. Use of switch type jumpers will prevent inadvertent contact and all jumper installations and removals will be independently verified. Additionally, the AF System will be available to supply water to the steam generators from the Condensate Storage Tank (CST) to remove decay heat from the reactor. Both pumps will be capable of meeting the 60 second delivery time required by the UFSAR.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the only impact on the AF System function will be that one of the SX supply isolation valves will be momentarily unavailable because its breaker will be in the OFF position. Since the affected Train will be declared inoperable and the applicable Technical Specification action statement entered, the AF System will be operated with the bounds of the UFSAR and Technical Specifications and the possibility of an accident or malfunction of a type different from those previously evaluated will not be created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the AF Train being tested will be declared inoperable and the Technical Specification action statement entered. All Technical Specification requirements will be met.

UFSAR REVISION

UFSAR Draft Revision Package 7-272

DESCRIPTION

The purpose of this UFSAR Revision was to reflect the current practice of non-use of the volume reduction charcoal filter HVAC unit.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the affected equipment is not related to the sequence of events leading to the initiation of any accident and is not relied upon to mitigate the consequences of any accident.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the effected systems do not have an impact on the events which initiate a Loss of Coolant Accident or a radioactive release accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameter upon which the Technical Specifications are based.

EXEMPT CHANGE

D20-0-98-333

DESCRIPTION

The purpose of this Exempt Change was to incorporate an installation tolerance and a range for the pin diameters for the pin connections, design loads and miscellaneous changes. In addition, the drawings for the Unit 2 Containment Spray (CS) were updated.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the anti-vibration supports are not associated with the initiating conditions of any UFSAR accidents. No adverse interactions are introduced to the Containment Spray (CS) or Residual Heat Removal (RH) Pump motors or the structural attachments of these supports. There is no adverse impact on the safety margin of any SSCs. All the supports remain qualified for the applied loads. The intended function of the anti-vibration supports did not change as a result of this change. The ASME Section XI operational readiness acceptance criteria of the CS/RH Pumps was assured by the applicable surveillances. The CS/RH Pumps were able to mitigate the consequences of a Design Basis Accident (DBA).
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the anti-vibration struts do not interact in an adverse manner with any SSCs. The intended function of the CS and RH Pumps did not change as a result of the proposed changes on the anti-vibration supports. The ASME Section XI operational readiness acceptance criteria were assured by the applicable surveillances. The changes facilitate assembly/disassembly of the pump motors. The design loads for the supports have been re-calculated and all the structural calculations related to the supports have been re-generated. All loads were found to be acceptable.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR REVISION

UFSAR Draft Revision Package 7-255

DESCRIPTION

As a result of Steam Generator replacement on Unit 1, a review of the Operational Transient Cycle Counting procedure BwVP 850-7 was performed. During this review, it was noted that UFSAR Table 3.9-1 item 8 indicated that under normal conditions, Unit loading and unloading between 0% and 15% of full power is designed for 580 occurrences/cycles. Per a review of Westinghouse design basis documents, the T-Hot Reduction Report WCAP-11388, indicated that certain design transients were revised to envelope operating conditions over the new T-Hot range. The above noted transient was indicated in the Westinghouse report as being 500 occurrences/cycles for both loading and unloading. As a result, the UFSAR needed to be revised to reflect this more conservative number of cycles.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed revision to the UFSAR is consistent with the Design Basis for cyclic/transient limits and therefore the fatigue/usage factor will be less than one.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed revision to the UFSAR is consistent with the Design Basis for cyclic/transient limits and therefore the fatigue/usage factor will be less than one. For the scenario of cyclic/transient limits, a large break Loss of Coolant Accident would not be expected to occur as long as the fatigue/usage factor is less than one.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

DOCUMENT CHANGE REQUEST

980496

DESCRIPTION

The purpose of this Document Change Request (DCR) was to revise P & IDs M-52 sheets 2 and 4, and C & IDs M-2058 sheets 3 and 4 to accurately reflect the as-designed and as-built configuration of the Carbon Dioxide (CO) System selector valves. This change is a documentation change only.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since there are no physical changes being made to the plant. The CO System cannot initiate an accident and its fire suppression capability is not changed. This change is a documentation change only to ensure that all drawings match the as-designed and as-built configuration of the plant.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because plant operation is not affected by this change. There are no changed system interactions. No physical changes are being made to the plant. This change is a documentation change only to ensure that the P & IDs and C & IDs match the asbuilt and as-designed configuration of the plant. The changes are consistent with the electrical drawings.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

DOCUMENT CHANGE REQUEST

980088

DESCRIPTION

The purpose of this Document Change Request (DCR) was to correct Unit mislabeling of the Computer Rooms/humidifiers on drawings M-113 sheet 1 and M-2113-8.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since this drawing revision corrects typographical errors reflecting actual/intended design configuration of the system humidifiers and is administrative in nature.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this change is administrative in nature and is revising drawing to reflect actual plant conditions.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced since the change does not affect any parameters upon which the Technical Specifications are based.

PROCEDURE REVISION

BwOP CV-M2

DESCRIPTION

The purpose of this Procedure Revision was to add valve 2CV461, Hydrolase Line Isolation Valve, to the mechanical lineup.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the additions of a 2" hydrolase tap installed in the Chemical and Volume Control System (CVCS) letdown flow path is a qualified Class B pressure boundary. this assures that there is no adverse impact on equipment important to the CVCS flow path and no increase in the probability of malfunction of such equipment. This is an administrative change to have the procedure reflect actual plant conditions.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the addition of a 2" line on the CVCS letdown line falls under the scenario of "Failure of Small Lines Carrying Primary Coolant Outside Containment" SAR section 15.6.2 and thus the addition of the hydrolase line would not create an unevaluated malfunction. This is an administrative change to have the procedure reflect actual plant conditions.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR REVISION

UFSAR Draft Revision Package 8-006

DESCRIPTION

The purpose of this UFSAR Draft Revision Package (DRP) was to clarify and correct configuration and performance data related to the Diesel Generator Full-Flow Lube Oil Filters. This DRP removes a reference to a specific filter element particle size removal rating and clarifies the discussion of expected filter differential pressures to be consistent with the currently installed and specified filter elements. In addition, this DRP removes a reference to a specific filter differential pressure which requires element replacement.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since this UFSAR revision has no impact on the existing operation and maintenance of the diesel generator lubricating oil system. The changes implemented provide clarifying information and remove potential confusion related to the particle size removal rating for the full-flow lube oil filters. The diesel generators remain available to mitigate the consequences of the evaluated accidents.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because there is no change in the normal operation of the diesel generators created by this UFSAR revision, nor are any new failure mechanisms/modes created by it's incorporation. The UFSAR revisions do not change any initiating event or condition for the evaluated accidents. The diesel generators remain a reliable source of emergency power to mitigate the consequences of any accident.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this UFSAR revision does not change any parameters upon which Technical Specifications are based.

SETPOINT CHANGE

SSCR 98-047

DESCRIPTION

The purpose of this Setpoint Change was to rescale Delta-T/Tave Loops 2A, 2B, 2C, and 2D due to changes in Reactor Coolant System (RCS) parameters.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this activity does not change the function or operation of the instrument loops.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the rescaling does not alter function or operation of the instrument loops. No new equipment was added to the plant.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

DOCUMENT CHANGE REQUEST

980506

DESCRIPTION

The purpose of this Document Change Request (DCR) was to remove the RCP undervoltage time delay setpoint value of 0.2 seconds as shown on Westinghouse drawing 108D685, sheet 5 and UFSAR Figure 7.2-1, sheet 5. The 0.2 second delay is not consistent with the nominal time delay setpoint value of 0.7 seconds for this function. Operability Determination 97-120 justifies the use of 0.7 seconds and cites the basis for this value as Westinghouse calculation CN-TA-93-232, revision 0.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since this change does not physically alter the current calibrated setpoint for the RCP undervoltage relay. A review of the associated design documents and drawings, and Operability Determination 97-120, has determined that this change is editorial in nature and does not change the physical plant settings. The plant calibrated setpoint for the RCP undervoltage time delay setting (0.7 seconds +/-0.035 seconds) is not being changed. The proposed drawing revision only removes an erroneous setting number of 0.2 seconds from the Westinghouse drawing 108D685, sheet 5, and UFSAR Figure 7.2-1 sheet 5.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the removal of the erroneous RCP undervoltage time delay setpoint from Westinghouse drawing 108D685, sheet 5 and UFSAR 7.2-1 sheet 5, is editorial. The plant calibrated setpoint is and has been 0.7 seconds +/-0.035 time delay for the UV trip circuitry. This is a conservative setting relative to the 0.95 seconds analyzed in the Westinghouse basis calculation CN-TA-93-232, revision 0.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because Technical Specification Bases Section 2.2.1 <u>Reactor Trip System Instrumentation Setpoints</u> states that "For Undervoltage, time delay is set so that the time required for a signal to cause a reactor trip after the Undrevoltage Trip Setpoint is reached shall not exceed 1.5 seconds". The 1.5 seconds is consistent with the Westinghouse bases calculation CN-TA-93-232, revision 0 which includes in the 1.5 seconds time delay for rod motion, 0.95 seconds for the UV trip cicuitry. The existing plant calibrated nominal time delay setpoint of 0.7 seconds +/-0.035 seconds is envoloped by the 0.95 seconds bases setting. Removal of the erroneous 0.2 second RCP time delay setpoint from Westinghouse drawing 108D685 sheet 5 and UFSAR Figure 7.2-1 sheet 5 will not reduce the margin of safety.

DOCUMENT CHANGE REQUEST

980507

DESCRIPTION

The purpose of this Document Change Request (DCR) was to revise the Equipment Piece Number of the Chemical Drain Filter as shown on drawing M-82 sheet 4 to read 0WZ03F instead of 0WX03F.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this is an administrative change to have the drawing accurately reflect the actual plant design.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this is an administrative change to have the drawing accurately reflect the actual plant design. The proposed change will not affect any plant operation. No new accident modes are introduced or methods of mitigating accidents affected.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this change does not affect any parameters upon which the Technical Specification are based.

UFSAR REVISON

UFDAR Draft Revision Package 8-007

DESCRIPTION

The purpose of this UFSAR Revision was to revise the paragraph that describes the material hardness properties for the post tensioning system anchor heads. This change is required because the current UFSAR description does not accurately describe the as-installed material properties of the anchor heads. The properties of the installed anchor heads were per Inryco post tensioning procedure PT.2.2 "Heat Treating Anchors" that were required for anchor heads after 9/1/80.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the initiating conditions for a Reactor Coolant System heat up event are not altered, and there is no impact on any plant SSCs, procedures, tests, or experiments involved in the initiating of such an event. The consequences of the accident will not be increase, and is demonstrated in calculation 5.2.2-BRW-98-1272 that the Containment Building design margins are maintained.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this activity only updates the UFSAR to provide an accurate description of the Containment Building Post Tensioning System anchor head material properties. The structural design margins for the tendon anchor heads are verified to be within the allowable limits as defined in UFSAR Chapter 3. Therefore, the function of the Containment Building will be unaffected by this change. There are no new interfaces between the tendon anchor heads and any other plant SSCs introduced by this change.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced since the tendon heads do not affect the function of the Containment Building. It does not affect any parameters upon which the Technical Specifications are based nor does it alter the function of any plant systems.

TEMPORARY MODIFICATION

98-1-023

DESCRIPTION

The purpose of this Temporary Modification was to disconnect failed thermocouple 1TE-IT8002AA and remove it from the scan. This thermocouple and/or it's associated cabling were producing bad indications. The poor indication (erroneous temperature indication) was skewing the Subcooled Margin Monitor channel information.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the thermocouple is used to provide temperature indication only to the Main Control Board and the Plant Process Computer. Lifting the leads provided a more accurate indication of the average of the ten highest reading thermocouples that allowed two channels of Reactor Subcooling Margin Monitors to remain operable. Lifting the leads for the subject thermocouple had no impact on the remaining thermocouples and had no affect on equipment failures. The operation of the subject, single thermocouple, is not relied upon for the mitigation of any accident or transient.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the thermocouples are used for monitoring purposes only. The thermocouple being removed was providing indications significantly higher than the remaining operable thermocouples. By lifting the leads and removing this single thermocouple from the scan, a more accurate indication of plant conditions was available to the operators. Lifting the leads to this thermocouple did not affect the operation/function of the remaining thermocouples. Thus, this change does not create a malfunction or accident of a type different than previously evaluated.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the Technical Specifications require a minimum of 4 operable thermocouples per quadrant. Removal of the subject thermocouple was well within the established Technical Specification Limit. Therefore, the margin of safety is not reduced as a result of this change.

NUCLEAR WORK REQUEST (NWR)

970025561 970104973

DESCRIPTION

The purpose of these Nuclear Work Requests was to inspect and clean the 2A Containment Spray (CS) Pump cubicle cooler and the 2B CS Pump cubicle cooler. Doors D-246 and D-844 had to be open to allow routing of hoses. These doors are considered to be part of the ventilation boundary.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because propping open of the doors does not have any impact on the events which initiate a Loss of Coolant Accident (LOCA) or has no impact on system piping to cause flooding accident. Propping open of doors with the administrative controls in place ensures any design basis accident remains bounded by the existing off-site dose boundary analysis calculation.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the affected structure provides a ventilation boundary for Auxiliary Building Ventilation (VA) System. Part of the design requirements for the VA System is to limit environmental conditions in various zones in conformance with requirements. The High Energy Break (HELB) analysis was reviewed for environmental impact in the CS rooms and was determined to be not applicable. Also, the system controls radioactivity in the areas served by staging the supply air from the clean areas to the areas of greater potential contamination. Propping open of the doors could affect the differential pressure requirements within certain ECCS rooms, thus affecting Technical Specification requirements. Therefore, administrative controls consists of adjusting pressure control damper 0VA600Y, located on 401' level, until the Auxiliary Building accessible area achieves at least 0.3 inches of water negative pressure with respect to atmosphere. This will ensure all normal and accident mitigation functions of VA System are met.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because all Technical Specification and differential pressure requirements were met.

PROCEDURE REVISION

BwAR 2-7-E4

DESCRIPTION

The purpose of this Procedure Revision was to change the high flow setpoint for Component Cooling Water (CC) flow from the Reactor Coolant Pumps (RCP) to 231 gpm.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the affected flow indicating switch provides automatic controlling function for the CC return valves associated with the RCP motor oil coolers. The change allows pump swaps without the threat of CC isolation. This is an administrative change to have the procedure reflect actual plant conditions.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the installation of the new indicating switch will enhance plant performance by allowing CC pump swaps without automatic isolation of CC. This is an administrative change to have the procedure reflect actual plant conditions.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which Technical Specifications are based.

NUCLEAR WORK REQUEST (NWR)

980077416

DESCRIPTION

The purpose of this Nuclear Work Request was to allow repairs on door D-815 to repair the latch/mortise assembly. This door is considered to be a ventilation boundary.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the accident mitigation function and normal functions of the Auxiliary Building Ventilation (VA) System will still continue to maintain the building at a negative pressure, control post accident radioactivity leaking from the Emergency Core Coolant System (ECCS) equipment within required limits, and maintain environment qualification (EQ) zone requirements for the affected areas.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the VA System and door D-815 is unrelated to the sequence of events leading to the initiation of an accident. Since the system's accident mitigation and normal functions will be maintained, the possibility of an accident or malfunction of a different type from those evaluated in the Safety Analysis Report (SAR) is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

MODIFICATION TEST

E20-1-97-301

DESCRIPTION

During the design and implementation of Exempt Change E20-1-95-209-010, various relays and devices associated with the Division 12 Miscellaneous Electrical Equipment Room and 125V ESF Battery Room Ventilation fans (VE) were rewired and a jumper was inadvertently removed. This modification test will perform the steps required to verify that the circuit continuity for the various relays and devices have been restored to original design.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased. This test verifies that the VE circuitry has been restored to original design that was inadvertently disabled during the implementation of exempt change E20-1-95-209-010. During this test, the system function will be maintained per UFSAR and Technical Specification requirements, thus the system's equipment heat and hydrogen removal capabilities will remain functional throughout the test.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new assumptions are being made with regard to the reliance on equipment or equipment performance. The system's logic integrity will be restored to its UFSAR design basis requirements. Therefore, the system will operate as before during normal and accident conditions.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced since all of the VE design functions are being restored to its intended safety related function per the UFSAR and Technical Specifications.

TECHNICAL REQUIREMENTS MANUAL

TRM Revision E

DESCRIPTION

The purpose of this Safety Evaluation was to document changes to the Current Technical Specifications (CTS) that were relocated to the Technical Requirements Manual during the conversion to Improved Technical Specification (ITS), specifically the "administrative" changes associated with TRM, revision E.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since the proposed activity involves changes in SAR words that have been categorized as "administrative". The changes do not involve any physical changes to plant systems, structures, or components (SCCS), or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed activity only involves changes in SAR words that have been categorized as "administrative". The changes do not involve any physical changes to plant system, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Consequently, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced since the NRC approved of the relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12/22/98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which TS are based.

TECHNICAL REQUIREMENTS MANUAL

TRM Revision E

DESCRIPTION

The purpose of this TRM Revision was to revise TSR 3.5.a.1 by eliminating reference to the circuit breaker position and control switch position of the required SI pump. This change is less restrictive than the Current Technical Specification (CTS) requirement on which it is based, i.e., CTS Surveillance Requirement 4.5.4.2.1.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since this revision continues to assure SI pump availability for purposes of mitigating the effects of a loss of decay heat removal transient by verifying the circuit breaker is racked in. In addition, the Bases for ITS LCO 3.4.12, "LTOP Systems", provides acceptable alternate methods of LTOP control to minimize the possibility of a mass input transient. Furthermore, the availability of an SI pump in MODES 5 and 6 with pressurizer level ≤ 5% does not present a LTOP concern since sufficient air volume exists which allows the operator time to mitigate the transient. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the requirement to employ at least two independent means to prevent a mass addition event such that single failure or single action will not result in an injection into the RCS when using an alternate method of LTOP control.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced since the NRC approved or relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12/22/98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the proposed changes do not affect any parameters upon which TS are based.

DESIGN CHANGE

D20-1-98-328-001

DESCRIPTION

The purpose of this Design Change was to replace existing obsolete Winding Hot Spot Temperature monitoring devices with new Qualitrol devices as recommended by transformer manufacturer on System Auxiliary Transformer (SAT) 142-1 1AP02E.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the functioning of the transformer is not affected by the change. It will not function differently than before the change. Changed failure modes have not been introduced by the change.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the changed devices are for monitoring only and do not affect the capability of the transformer to perform its function to provide power to components.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR REVISION

UFSAR Draft Revision Package 7-255

DESCRIPTION

As a result of Steam Generator replacement on Unit 1, a review of the Operational Transient Cycle Counting procedure BwVP 850-7 was performed. During this review, it was noted that UFSAR Table 3.9-1 item 8 indicated that under normal conditions, Unit loading and unloading between 0% and 15% of full power is designed for 580 occurrences/cycles. Per a review of Westinghouse design basis documents, the T-Hot Reduction Report WCAP-11388, indicated that certain design transients were revised to envelope operating conditions over the new T-Hot range. The above noted transient was indicated in the Westinghouse report as being 500 occurrences/cycles for both loading and unloading. As a result, the UFSAR needed to be revised to reflect this more conservative number of cycles.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the proposed revision to the UFSAR is consistent with the Design Basis for cyclic/transient limits and therefore the fatigue/usage factor will be less than one.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the proposed revision to the UFSAR is consistent with the Design Basis for cyclic/transient limits and therefore the fatigue/usage factor will be less than one. For the scenario of cyclic/transient limits, a large break Loss of Coolant Accident would not be expected to occur as long as the fatigue/usage factor is less than one.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

TECHNICAL REQUIREMENTS MANUAL

TRM Revision E

DESCRIPTION

The purpose of this TRM Revision was to justify relocation of Current Technical Specifications (CTS) requirements, originally designated for the Technical Requirements Manual (TRM) during the conversion to Improved Technical Specification (ITS), to Plant Procedures.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since no technical changes (either actual or interpretational) were made in relocating these former CTS requirements to Plant Procedures. Consequently, the proposed changes do not impact the accident analyses. Furthermore, relocation of these miscellaneous requirements does not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Thus, the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety is not increased.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no technical changes (either actual or interpretational) were made in relocating these former CTS requirements to Plant Procedures. In addition, the method of controlling subsequent changes to these miscellaneous requirements is adequate. Furthermore, relocation of these miscellaneous requirements does not involve any physical changes to plant systems, structures, or components (SSCs), or decrease the level of safety to which these SSCs are operated and maintained. Thus, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12/22/98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, subsequent relocation to Plant Procedures dose not affect any parameters upon which TS are based.

TECHNICAL REQUIREMENTS MANUAL

TRM Revision E

DESCRIPTION

The purpose of this TRM Revision was to revise TLCO 3.0.e to delete the allowance for returning equipment to service under administrative control solely to perform testing required to demonstrate variables to be within limit. This change is more restrictive than that allowed by Revision D of the TRM, but is considered less restrictive since TLCO 3.0.e provides allowances not contained in Current Technical Specification (CTS).

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because temporarily returning the equipment to service will promote timely restoration of the operability of the equipment and reduce the probability of any events that may have been prevented by such operable equipment. Temporarily returning the equipment to service in a state which is expected to function as required to mitigate the consequences of a previously analyzed accident will promote timely restoration of the operability of the equipment to mitigate the consequences of such accidents.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because temporarily returning inoperable equipment to service under administrative controls to perform surveillance requirements to prove its operability does not introduce new failure modes of plant operation and does not involve physical modifications to the plant. Operation with the inoperable equipment temporarily restored to service is not considered a new mode of operation since existing procedures and administrative controls prevent the restoration of equipment to service until it is considered capable of providing the required safety functions. As such, the possibility of an accident or malfunction of a different type than any previously evaluated is not created.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the NRC approved of relocating certain CTS specifications and details to the TRM in its SER of Braidwood TS Amendment 98, dated 12/22/98. Upon implementation of the ITS, these details are no longer applicable as TS requirements. Consequently, the changes do not affect any parameters upon which TS are based.

DESIGN CHANGE

D20-0-97-205

DESCRIPTION

The purpose of this Design Change was to relocate ionization detector 0XY-VL001 upstream of the Laboratory HVAC (VL) supply fans (0VL01CA/CB) and downstream of the filter rack within the supply plenum. This change eliminates detector degradation due to water intrusion from the humidifier spray header.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the changes do not adversely impact the fire detection capability of the ionization detector within the supply plenum. The design function of the equipment has not changed. This fire detector is not an accident initiator and therefore, does not affect any accident or malfunction of equipment important to safety that was previously evaluated in the UFSAR.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because no new failure modes, failure mechanisms, or abnormal operating configurations are introduced by the implementation of the design change.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this change doe not affect any parameters upon which Technical Specifications are based.

DESIGN CHANGE

D20-1/2-98-322-001 D20-1/2-98-322-002

DESCRIPTION

The purpose of these Design Changes was to replace the existing Digital Rod Position Indication (DRPI) field cables and DRPI and Control Rod Drive Mechanism (CRDM) Reactor Head cables with more flexible cable. The changes will also upgrade the DRPI and CRDM connectors at the Reactor Head connection plate and the DRPI connectors at the Data Cabinets and detectors. To perform the CRDM Reactor Head plate connector upgrade on the field cables side, a section of new cable will be spliced to the existing field cable.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the changes do not alter the design, function or operation of the systems.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the change in cable and connector types does not change the operation of the system and no new failures are associated with the new cables or connectors.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

TEMPORARY ALTERATION

98-1-026

DESCRIPTION

The purpose of this Temporary Alteration (TALT) was to remove the front card edge connection from the Digital Rod Position Indication (DRPI) Detector/Encoder Card for rod J13 in the Data 'A' cabinet. This places DRPI for that rod into half-accuracy using Data 'B' information only.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this TALT affects the DRPI system only, which is an indication only system. It provides no control functions. The TALT does not cause a loss off of the Deviation Alarm, and alarm response actions are not changed. The shutdown rod insertion limits are not changed as a result of this activity. The DRPI system is physically separated from any safety systems and systems important to safety. Thus the probabilities are not increased and all accidents or malfunctions continue to be bounded by the accident analyses.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this activity places the DRPI system into half-accuracy for the affected rod, which is a condition already discussed in the SAR. The rod-off-top alarm will still annunciate as designed. No changes are made which add components to the system. Thus there is no possibility of a different type of accident or malfunction.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not exceed limits as defined in the Tech Specs or their bases. This change also affects only the non-safety DRPI system. Thus the margin of safety is not reduced.

ENGINEERING REQUEST

9802207

DESCRIPTION

The purpose of this Engineering Request was to evaluate the installation of a freeze seal on the upstream piping from isolation valve 0FP241 in accordance with Station procedures. The freeze seal provides component isolation for valve 0FP241 from a currently non-isolable portion the Fire Protection (FP) System since valve 0FP294 is not operating. Valve 0FP241 is scheduled to be repaired (valve seat leakage) under WR970123962. Also, valve 0FP293 will be closed downstream of valve 0FP241 to prevent backflow through to valve 0FP241.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the installation of freeze seals to provide component isolation for maintenance is a common, proven industry practice. The procedures utilize industry-recognized methodologies to insure system integrity is maintained throughout the maintenance activity. The differential pressures, process fluid temperatures, and room ambient conditions to which the freeze seal will be exposed to do not create any unique challenges for establishing and maintaining component isolation.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created since the piping affected by the added freeze plug is qualified for the additional weight of the freeze assembly. In addition, there are no flooding concerns, nor are there any concerns with respect to required FP water supply. The impact of the failure of the freeze seal does not change the normal operation nor impact the reliability of this equipment in any way.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because the freeze seal application to this Fire Protection Supply Header does not affect any parameters upon which Technical Specifications are based.

ENGINEERING REQUEST

ER 9801423

DESCRIPTION

The purpose of this Engineering Request was to evaluate the installation of temporary freeze seals on line 2CV44AA-3/4 and on line 2CV44AB-3/4. The freeze seals were independent of one another and can be installed separately or concurrently. The freeze seals were required to establish the pressure boundary for the completion of the 10 year pressure test of the Pressurizer auxiliary spray line (2CV45A-2"), in the event valve 2CV8392A and 2CV8392B leak-by. The freeze seals would only be installed during plant operating modes 5, 6 or defueled. The weight of the freeze seal is less than 5 lbs.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the affected piping has been found to remain seismically qualified with the additional weight of each freeze seal assembly. An overpressure condition will not exist since the charging-side line will not be isolated and 2600 psig is the maximum discharge head of the Centrifugal Charging Pump (the test pressurization source). Therefore, it is acceptable to isolate the relief line. Leakage from an unlikely freeze seal failure should be minimal and the special procedure will require that if there is any loss of pressure, the test shall be immediately suspended.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the freeze seals have the same effect on plant operation as closing valves 2CV8392A and 2CV8392B. The freeze seals are a temporary condition and will only be installed when the plant is in Modes 5, 6 or defueled. There is no effect on the operation of any system.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

DOCUMENT CHANGE REQUEST

980531

DESCRIPTION

The purpose of this Document Change Request was to revise applicable drawings due to non-use and removal of the Filter Removal (Servicing) Machine.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because the removal of this component is not a precursor to any accident to affect its probability or important in any accident mitigation. A malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased due to this change because the subject component does not affect any equipment that is important to safety.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the purpose of the Filter Removal Machine was to minimize dose to personnel during filter changes. Other methods and equipment are used to minimize dose rates during filter changes.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR REVISION

UFSAR Draft Revision Package 8-012

DESCRIPTION

The purpose of this UFSAR Revision was to provide an alternate allowable thermal expansion stress range (SA) to be used in postulating pipe cracks and breaks in moderate and high energy piping, respectively.

- The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased since this change does not impact qualification of the affected systems, structures or components (SSCs) to ASME Section III Class 2 and 3 rules (or ANSI B31.1 rules, as applicable). The change eliminates unnecessary conservatisms in the determination of SA, while maintaining a factor of safety of two (or more) with respect to stress, regardless of the number of occurrences associated with the loading condition.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because the affected SSCs continue to meet the appropriate Code equations and HELB/MELB issues continue to be adequately addressed.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced since the UFSAR revision does not affect any parameters upon which Technical Specifications are based.

PROCEDURE REVISION

BwMP 3100-093

DESCRIPTION

The purpose of this Procedure Revision was to install and remove temporary cables/hoses through the Refueling Water Storage Tank (RWST) tunnels and the Fuel Handling Building.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this procedure is merely the proceduralization of existing Temporary Alterations. These Temporary Alterations were performed each refueling outage and a 50.59 Safety Evaluation was performed each time. This activity does not affect equipment important to safety.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because this only the Temporary Alteration transformed into Station procedure format. The actions performed in the procedure are the same ones performed in the Temporary Alteration, therefore any accidents analyzed in the Temporary Alteration Safety Evaluations, apply to the procedure. This activity does not install any new equipment in the plant.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.

UFSAR REVISION

UFSAR Draft Revision Package 7-155

DESCRIPTION

The purpose of this UFSAR Revision was to revise Appendix A1.63 to reflect the applicable revision of Regulatory Guide 1.63 from revision 2 to revision 0 that ComEd implements.

- 1. The probability of an occurrence, or the consequences of an accident, or a malfunction of equipment important to safety, as previously evaluated in the UFSAR, is not increased because this activity is revising the wording to reflect what was contained in the UFSAR. This change ensures vendors for electrical penetration assemblies in containment meet the requirements of revision 0 of the Regulatory Guide, which was in effect at the time the construction permit application was docketed. All applicable requirements of the Regulatory Guide in effect when the permit was docketed will be met, the probability of occurrence or the consequences of an accident or malfunction are not affected.
- 2. The possibility of an accident or malfunction of a different type than previously evaluated in the UFSAR is not created because ComEd will continue to meet the requirements of the revision of the Regulatory Guide that was contained in the UFSAR. All construction, maintenance and operational requirements will continue to be met. This is administrative change only.
- 3. The margin of safety, as defined in the Bases of the Technical Specifications, is not reduced because this activity does not affect any parameters upon which the Technical Specifications are based.