August 9, 1988

Docket No.: 50-271

See Correction letter of 9-1-88

Mr. R. W. Capstick
Licensing Engineer
Vermont Yankee Nuclear Power
Corporation
1671 Worcester Road
Framingham, Massachusetts 01701

Dear Mr. Capstick:

SUBJECT: ISSUANCE OF AMENDMENT NO. 106 TO DPR-28 VERMONT YANKEE NUCLEAR POWER STATION (TAC NO. 66702)

The Commission has issued the enclosed Amendment No. 106 to Facility Operating License No. DPR-28 for the Vermont Yankee Nuclear Power Station. The amendment consists of changes to the Technical Specifications in response to your application dated November 30, 1987, with clarification as stated by letter dated January 20, 1988.

The amendment changes the Technical Specifications with respect to logic system functional test interval.

The interval is changed from six months to once-per-operating cycle.

A copy of the Safety Evaluation is also enclosed.

Sincerely,

/S/

Vernon L. Rooney, Project Manager
Project Directorate I-3
Division of Reactor Projects I/II

Enclosures:
1. Amendment No. 106 to License No. DPR-28
2. Safety Evaluation

cc w/enclosure:
See next page

OFC	PDI-3	PDI-3	OGC	PDI-3/AC/DIR		
NAME	MRushbrook	VRooney:ck		~~VNerses~~ DMcDonald		
DATE	7/25/88	7/25/88	7/28/88	8/2/88		

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

August 9, 1988

Docket No.: 50-271

Mr. R. W. Capstick
Licensing Engineer
Vermont Yankee Nuclear Power
Corporation
1671 Worcester Road
Framingham, Massachusetts 01701

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SUBJECT: ISSUANCE OF AMENDMENT NO.106 TO DPR-28 VERMONT YANKEE NUCLEAR POWER STATION (TAC NO. 66702)

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Sincerely,

Vernon L. Rooney, Project Manager
Project Directorate I-3
Division of Reactor Projects I/II

Enclosures:
1. Amendment No. 106 to License No. DPR-28
2. Safety Evaluation

cc w/enclosure:
See next page

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Vermont Yankee Nuclear Power Corporation

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Washington, DC 20555

Adjudicatory File (2)
Atomic Safety and Licensing Board
Panel Docket
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

VERMONT YANKEE NUCLEAR POWER CORPORATION

DOCKET NO. 50-271

VERMONT YANKEE NUCLEAR POWER STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 106
License No. DPR-28

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Vermont Yankee Nuclear Power Corporation (the licensee) dated November 30, 1987 as supplemented on January 20, 1988 complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I:

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-28 is hereby amended to read as follows:

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(B) Technical Specifications

The Technical Specifications, contained in Appendix A, as revised through Amendment No. 106, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Daniel G. McDonald Jr.

Acting for Richard H. Wessman, Director
Project Directorate I-3
Division of Reactor Projects I/II

Attachment:
Changes to the Technical
Specifications

Date of Issuance: August 9, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 106

FACILITY OPERATING LICENSE NO. DPR-28

DOCKET NO. 50-271

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised pages are identified by amendment number and contain vertical lines indicating the areas of change. The corresponding overleaf pages are provided to maintain document completeness.

Remove Pages	Insert Pages
50	50
51	51
52	52
53	53
53a	53a
54	54
55	55
56	56
57	57
58	58
59	59
64	64
67	67

TABLE 4.2.1

Minimum Test and Calibration Frequencies

Emergency Core Cooling Actuation Instrumentation

Core Spray System

Trip Function	Functional Test(8)	Calibration(8)	Instrument Check
High Drywell Pressure	(Note 1)	Once/Operating Cycle	Once Each Day
Low-Low Reactor Vessel Water Level	(Note 1)	Once/Operating Cycle	Once Each Day
Low Reactor Pressure	(Note 1)	Once/Operating Cycle	----
Pump 14-1A, Discharge Press	(Note 1)	Every Three Months	----
Auxiliary Power Monitor	(Note 1)	Every Refueling	Once Each Day
Pump Bus Power Monitor	(Note 1)	None	Once Each Day
High Sparger Pressure	(Note 1)	Every Three Months	----
Trip System Logic	Once/Operating Cycle (Note 2)	Once/Operating Cycle (Note 3)	----

TABLE 4.2.1
(Continued)

Low Pressure Coolant Injection System

Trip Function	Functional Test(8)	Calibration(8)	Instrument Check
Low Reactor Pressure No. 1	(Note 1)	Once/Operating Cycle	----
High Drywell Pressure No. 1	(Note 1)	Once/Operating Cycle	Once Each Day
Low-Low Reactor Vessel Water Level	(Note 1)	Once/Operating Cycle	Once Each Day
Reactor Vessel Shroud Level	(Note 1)	Every Three Months	----
Low Reactor Pressure No. 2	(Note 1)	Every Three Months	----
RHR Pump Discharge Pressure	(Note 1)	Every Three Months	----
High Drywell Pressure No. 2	(Note 1)	Every Three Months	----
Low Reactor Pressure No. 3	(Note 1)	Once/Operating Cycle	----
Auxiliary Power Monitor	(Note 1)	Every Refueling Outage	Once Each Day
Pump Bus Power Monitor	(Note 1)	None	Once Each Day
LPCI Crosstie Monitor	None	None	Once Each Day
Trip System Logic	Once/Operating Cycle (Note 2)	Once/Operating Cycle (Note 3)	----

TABLE 4.2.1
(Continued)

High Pressure Coolant Injection System

Trip Function	Functional Test(8)	Calibration(8)	Instrument Check
Low-Low Reactor Vessel Water Level	(Note 1)	Once/Operating Cycle	Once Each Day
Low Condensate Storage Tank Water Level	(Note 1)	Every Three Months	----
High Drywell Pressure	(Note 1)	Once/Operating Cycle	Once Each Day
Bus Power Monitor	(Note 1)	None	Once Each Day
Trip System Logic	Once/Operating Cycle (Note 2)	Once/Operating Cycle (Note 3)	----

TABLE 4.2.1
(Continued)

Automatic Depressurization System

Trip Function	Functional Test(8)	Calibration(8)	Instrument Check
Low-Low Reactor Vessel Water Level	(Note 1)	Once/Operating Cycle	Once Each Day
High Drywell Pressure	(Note 1)	Once/Operating Cycle	Once Each Day
Bus Power Monitor	(Note 1)	None	Once Each Day
Trip System Logic (Except Solenoids of Valves)	Once/Operating Cycle (Note 2)	Once/Operating Cycle (Note 3)	----

TABLE 4.2.1
(Continued)

Recirculation Pump Trip Actuation System

Trip Function	Functional Test[8]	Calibration[8]	Instrument Check
Low-Low Reactor Vessel Water Level[4]	(Note 1)	Once/Operating Cycle	Once Each Day
High Reactor Pressure[4]	(Note 1)	Once/Operating Cycle	Once Each Day
Trip System Logic	Once/Operating Cycle	Once/Operating Cycle	----

TABLE 4.2.2

Minimum Test and Calibration Frequencies

Primary Containment Isolation Instrumentation

Trip Function	Functional Test(8)	Calibration(8)	Instrument Check
Low-Low Reactor Vessel Water Level	(Note 1)	Once/Operating Cycle	Once Each Day
High Steam Line Area Temperature	(Note 1)	Each Refueling Outage	----
High Steam Line Flow	(Note 1)	Every Three Months	Once Each Day
Low Main Steam Line Pressure	(Note 1)	Every Three Months	----
Low Reactor Vessel Water Level	(Note 1)	Once/Operating Cycle	----
High Main Steam Line Radiation	(Notes 1 and 7)	Each Refueling Outage	Once Each Day
High Drywell Pressure	(Note 1)	Once/Operating Cycle	Once Each Day
Condenser Low Vacuum	(Note 1)	Every Three Months	----
Trip System Logic	Once/Operating Cycle (Note 2)	Once/Operating Cycle (Note 3)	----

TABLE 4.2.2
(Continued)

Minimum Test and Calibration Frequencies

High Pressure Coolant Injection System Isolation Instrumentation

Trip Function	Functional Test(8)	Calibration(8)	Instrument Check
High Reactor Water Level	(Note 1)	Once/Operating Cycle	----
High Steam Line Space Temperature	(Note 1)	Each Refueling Outage	----
High Steam Line D/P (Steam Line Break)	(Note 1)	Every Three Months	----
Low HPCI Steam Supply Pressure	(Note 1)	Every Three Months	----
Main Steam Line Tunnel Temperature	(Note 1)	Each Refueling Outage	----
Bus Power Monitor	(Note 1)	None	Once Each Day
Trip System Logic	Once/Operating Cycle (Note 2)	Once/Operating Cycle (Note 3)	----

TABLE 4.2.2
(Continued)

Minimum Test and Calibration Frequencies

Reactor Core Isolation Cooling System Isolation Instrumentation

Trip Function	Functional Test(8)	Calibration(8)	Instrument Check
Main Steam Line Tunnel Temperature	(Note 1)	Each Refueling Outage	----
High Steam Line Space Temperature	(Note 1)	Each Refueling Outage	----
High Steam Line D/P Including Time Delay Relays (Steam Line Break)	(Note 1)	Every Three Months	----
High Reactor Water Level	(Note 1)	Once/Operating Cycle	----
Low RCIC Steam Supply Pressure	(Note 1)	Every Three Months	----
Bus Power Monitor	(Note 1)	None	Once Each Day
Trip System Logic	Once/Operating Cycle (Note 2)	Once/Operating Cycle (Note 3)	----

TABLE 4.2.3

Minimum Test and Calibration Frequencies

Reactor Building Ventilation and Standby Gas Treatment System Isolation

Trip Function	Functional Test(8)	Calibration(8)	Instrument Check
Low Reactor Vessel Water Level	(Note 1)	Once/Operating Cycle	----
High Drywell Pressure	(Note 1)	Once/Operating Cycle	----
Reactor Building Vent Exhaust Radiation	Monthly	Every Three Months	Once Each Day
Refueling Floor Zone Radiation	Monthly	Every Three Months	Once Each Day During Refueling
Reactor Building Vent Trip System Logic	Once/Operating Cycle (Note 2)	Once/Operating Cycle (Note 3)	----
Standby Gas Treatment Trip System Logic	Once/Operating Cycle (Note 2)	Once/Operating Cycle (Note 3)	----
Logic Bus Power Monitor	(Note 1)	None	Once Each Day

TABLE 4.2.4

Minimum Test and Calibration Frequencies

Off-Gas System Isolation Instrumentation

Trip Function	Functional Test(8)	Calibration(8)	Instrument Check
Augmented Off-Gas Trip System Logic (AOG)	Once/Operating Cycle (Note 2)	Once/Operating Cycle (Note 3)	----

TABLE 4.2.5

Minimum Test and Calibration Frequencies

Control Rod Block Instrumentation

Trip Function	Functional Test	Calibration
Startup Range Monitor		
a. Upscale	Notes 4 and 6	Note 6
b. Detector Not Fully Inserted	Note 6	Note 6
Intermediate Range Monitor		
a. Upscale	Notes 4 and 6	Note 6
b. Downscale	Notes 4 and 6	Note 6
c. Detector Not Fully Inserted	Note 6	Note 6
Average Power Range Monitor		
a. Upscale (Flow Bias)	Notes 1 and 4	Every Three Months
b. Downscale	Notes 1 and 4	Every Three Months
Rod Block Monitor		
a. Upscale (Flow Bias)	Notes 1 and 4	Every Three Months
b. Downscale	Notes 1 and 4	Every Three Months
Trip System Logic	Once/Operating Cycle (Note 2)	Once/Operating Cycle (Note 3)
High Water Level in Scram Discharge Volume	Every Three Months	Refueling Outage

3.2 (Continued)

High radiation monitors in the main steam line tunnel have been provided to detect gross fuel failure resulting from a control rod drop accident. This instrumentation causes closure of Group 1 valves, the only valves required to close for this accident. With the established setting of 3 times normal background and main steam line isolation valve closure, fission product release is limited so that 10CFR100 limits are not exceeded for the control rod drop accident, and 10CFR20 limits are not exceeded for gross fuel failure during reactor operations. With an alarm setting of 1.5 times normal background, the operator is alerted to possible gross fuel failure or abnormal fission product releases from failed fuel due to transient reactor operation.

Pressure instrumentation is provided which trips when main steam line pressure drops below 800 psig. A trip of this instrumentation results in closure of Group 1 isolation valves. In the refuel, shutdown, and startup modes, this trip function is provided when main steam line flow exceeds 40% of rated capacity. This function is provided primarily to provide protection against a pressure regulator malfunction which would cause the control and/or bypass valves to open, resulting in a rapid depressurization and cooldown of the reactor vessel. The 800 psig trip setpoint limits the depressurization such that no excessive vessel thermal stress occurs as a result of a pressure regulator malfunction. This setpoint was selected far enough below normal main steam line pressures to avoid spurious primary containment isolations.

Low condenser vacuum has been added as a trip of the Group 1 isolation valves to prevent release of radioactive gases from the primary coolant through condenser. The setpoint of 12 inches of mercury absolute was selected to provide sufficient margin to assure retention capability in the condenser when gas flow is stopped and sufficient margin below normal operating values.

The HPCI and/or RCIC high flow, steam supply pressure, and temperature instrumentation is provided to detect a break in the HPCI and/or RCIC piping. Tripping of this instrumentation results in actuation of HPCI and/or RCIC isolation valves, i.e., Group 6 valves. A time delay has been incorporated into the RCIC steam flow trip logic to prevent the system from inadvertently isolating due to pressure spikes which may occur on startup. The trip settings are such that core uncovering is prevented and fission product release is within limits.

The instrumentation which initiates ECCS action is arranged in a dual channel system. Permanently installed circuits and equipment may be used to trip instrument channels. In the nonfail safe systems which require energizing the circuitry, tripping an instrument channel may take the form of providing the required relay function by use of permanently installed circuits. This is accomplished in some cases by closing logic circuits with the aid of the permanently installed test jacks or other circuitry which would be installed for this purpose.

4.2 PROTECTIVE INSTRUMENTATION

The Protective Instrumentation Systems covered by this Specification are listed in Table 4.2. Most of these protective systems are composed of two or more independent and redundant subsystems which are combined in a dual-channel arrangement. Each of these subsystems contains an arrangement of electrical relays which operate to initiate the required system protective action.

The relays in a subsystem are actuated by a number of means, including manually-operated switches, process-operated switches (sensors), bistable devices operated by analog sensor signals, timers, limit switches, and other relays. In most cases, final subsystem relay actuation is obtained by satisfying the logic conditions established by a number of these relay contacts in a logic array. When a subsystem is actuated, the final subsystem relay(s) can operate protective equipment, such as valves and pumps, and can perform other protective actions, such as tripping the main turbine generator unit.

With the dual-channel arrangement of these subsystems, the single failure of a ready circuit can be tolerated because the redundant subsystem or system (in the case of high pressure coolant injection) will then initiate the necessary protective action. If a failure in one of these circuits occurs in such a way that an action is taken, the operator is immediately alerted to the failure. If the failure occurs and causes no action, it could then remain undetected, causing a loss of the redundancy in the dual-channel arrangement. Losses in redundancy of this nature are found by periodically testing the relay circuits and contacts in the subsystems to assure that they are operating properly.

It has been the practice in boiling water reactor plants to functionally test protective instrumentation sensors and sensor relays on-line on a monthly frequency. Since logic circuit tests result in the actuation of plant equipment, testing of this nature was done while the plant was shut down for refueling. In this way, the testing of equipment would not jeopardize plant operation.

This Specification is a periodic testing program which is based upon the overall testing of protective instrumentation systems, including logic circuits as well as sensor circuits. Table 4.2 outlines the test, calibration, and logic system functional test schedule for the protective instrumentation systems. The testing of a subsystem includes a functional test of each relay wherever practicable. The testing of each relay includes all circuitry necessary to make the relay operate, and also the proper functioning of the relay contacts. Functional testing of the inaccessible temperature switches associated with the isolation systems is accomplished remotely by application of a heat source to individual switches.

All subsystems are functionally tested, calibrated, and operated in their entirety.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 106 TO FACILITY OPERATING LICENSE NO. DPR-28

VERMONT YANKEE NUCLEAR POWER STATION

DOCKET NO. 50-271

1.0 INTRODUCTION

By letter dated November 30, 1987 with modifications and clarification submitted on January 20, and April 13, 1988, the Vermont Yankee Nuclear Power Corporation (Vermont Yankee, the licensee) requested changes to the Vermont Yankee Technical Specifications (TS) as incorporated in Facility Operating License DPR-28. The proposed change is concerned with increasing the Logic System Functional Testing and Calibration intervals from every six months to once per operating cycle. The following systems would be affected by this proposed change:

1) Core Spray System

2) Low Pressure Coolant Injection System

3) High Pressure Coolant Injection System

4) Automatic Depressurization System

5) Recirculation Pump Trip Actuation System

6) Primary Containment Isolation

7) High Pressure Coolant Injection System Isolation

8) Reactor Core Isolation Cooling System Isolation

9) Reactor Building Ventilation System Isolation and Standby Gas Treatment System Isolation

10) Off-Gas System Isolation

11) Control Rod Block System

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This proposed change would add relays that were exempted from the six-month system logic testing and calibration.

The licensee based their proposed change on the following:

1. Plant safety and operational requirements dictate that many surveillance tests required by the Technical Specifications should be or must be performed during periods of planned plant shutdowns, such as refueling outages. The revised trip system logic testing methodology and procedures have resulted in an increased number of relays and contacts directly tested. A change in the requirements from performing these tests every six months to once per operating cycle allows for safer testing flexibility since many of the relays are not testable during power operations without creating an unnecessary risk to the plant, due to unnecessary challenges to systems and bypasses of portions of systems for testing.

2. The proposed logic surveillance test intervals meet the intent and purpose of the surveillance requirements for the system(s) and are consistent with those specified within the BWR Standard Technical Specifications (STS).

3. The proposed surveillance frequency allows greater flexibility in scheduling the surveillance of the systems and, as such, provides for performance at more opportune times when testing conditions are less challenging to operational safety.

Based upon the Vermont Yankee review of their technical specifications and the NRC interpretation of an acceptable Logic System Functional Test it was determined that enhancements could be made in the licensees technical specifications. The Vermont Yankee Technical Specification defines the Logic System Functional Test as "a test of all relays and contacts of a logic circuit from sensor to activated device to insure all components are operable per design intent. Where possible, action will go to completion, i.e., pumps will be started and valves opened."

2.0 EVALUATION

The staff has reviewed the Vermont Yankee Nuclear Power Corporation proposed TS changes in accordance with section 7 of the Standard Review Plan. As part of the staff's review a meeting was held between Vermont Yankee and NRC to discuss staff concerns, on March 15, 1988. Additional information was also provided by the licensee on April 13, 1988 in response to the staff's request.

As a result of the staff's review of Vermont Yankee's submittals and the meeting of March 15, 1988, the staff has noted the following:

1) The requested change meets the licensee's TS definition of Logic System Functional Testing in that the enhanced testing to be performed at once-per-operating cycle is a complete sensor to actuated device Logic System Functional Test, while the existing six-month test is not. The TS are presently written to exempt certain safety-related relays from the six-month Logic System Functional Testing. In the proposed TS the licensee did not request to exempt any relays therefore, all relays in the instrument string are tested. In the meeting with the licensee it was also noted the six-month test is performed by overlap testing. The overlap test (monthly and six-month) covers only the sensor relays.

   As part of the overlap test the sensor relays are cycled monthly to complete the individual channel functional testing. In the monthly testing the sensor relay cycling is verified; however, individual relay contacts continuity is not verified. During the six-month trip Logic System Functional Testing the same relay contacts are bypassed and are therefore not verified to be operational. The licensee takes credit for the monthly functional testing combined with their existing six-month trip Logic System Functional Testing as a complete Logic System Functional Test as defined by their TS. The staff generally agrees that overlap testing is acceptable; however, the staff does not believe there is adequate overlap in the Vermont Yankee present method of Logic System Functional Testing since the sensor contacts are not verified to be operational. The sensor relays are cycled during the monthly testing to verify mechanical operation; however, the specific contacts that would perform the required safety input to the Logic System are not verified. The enhanced Logic System Functional Test proposed by the licensee to be performed once-per-operating cycle is a complete sensor to actuated safety-related device test. The enhanced test will verify the operation of the sensor relay contacts. The staff considers the once-per-operating cycle test to be a complete Logic System Functional Test, which meets both the Licensee's and the Standard TS requirements. It is also noted that the once-per-operating cycle testing is consistent with the Standard TS testing interval requirements for Logic System Functional testing.

2. It has also been noted that during the existing six-month testing, the High Pressure Core Injection (HPCI), the Reactor Core Isolation Cooling (RCIC), Low Pressure Core Injection (LPCI) and Off Gas Systems are disabled during the specific Logic System Functional Testing. The period that the individual systems are out of service varies from two to six hours as relays associated with each system are tested. If an event occurred that required one of these systems to initiate while it was being tested, the system would not initiate automatically and would require manual actions from the operator. The staff does not believe it is desirable to either plant or public safety to make any safety-related system unavailable while the plant

is operating at power. The staff concludes that performing the Logic System Functional Testing once-per-operating cycle, when the plant is shutdown, is more desirable with respect to both plant and public safety.

3. The Vermont Yankee proposed TS change does not change setpoints, plant operations, protective functions, or the design basis of the plant. Therefore, these proposed changes do not create the possibility of a new or different kind of accident from any previously analyzed.

4. The potential of disabling safety equipment or challenging systems and components by lifting leads and using jumpers or incorrect system line up as a result of human error is reduced by requiring less frequent surveillance and conducting the testing during periods of plant shutdown.

The staff has reviewed the Vermont Yankee Power Corporation submittal and has concluded that changing the Logic System Functional Test Intervals from six-months to once-per-operating cycle for Vermont Yankee is acceptable based on the following:

1. The six-month testing is performed with the plant operating, which creates a situation for potential inadvertent scrams, actuations of equipment, and resultant transients with attendant unnecessary risks. Once-per-operating cycle testing is performed with the plant shutdown. Testing with the plant shutdown poses less operational challenges to the plant.

2. Existing six-month testing is incomplete due to exempt relays and sensor relay contacts not being properly tested and verified. The once-per-operating cycle test is a complete system test from sensor to actuator.

3. Six-month testing requires removing safety-related systems from service while the plant is operating, which is undesirable. The once-per-operating cycle test is only performed with the plant shutdown when the demand for safety systems is considerably reduced.

4. The proposed change does not change setpoints, plant operations, protective functions, or design basis of the plant. The change will not create the possibility of a new or different kind of accident from those previosuly analyzed.

5. In this case, the once-per-operating cycle test is more desirable since there will be less chance for human error that could inadvertently leave safety-related systems inoperable. Human errors are mistakes made by individuals, such as safety systems left with improper system line-ups, jumpers left installed or leads lifted which would adversely affect the proper initiation of a safety-related system. Increasing the test intervals decreases the chance for making human errors, thus reducing the chance of unknowingly making safety-related systems inoperable.

In summary the staff finds the once-per-operating cycle Logic System Functional Testing to be a more complete Logic System Functional Test than the existing six-month test. The content of the tests and test intervals are consistent with the STS, and are sufficient for monitoring the operability of system logic. In addition, since the testing will be performed when the plant is shutdown, there will be less system reconfiguration which will minimize human error. The staff believes that the new test requirement is a safety improvement over the old test requirement.

For the above reasons, the staff has concluded that the proposed TS is acceptable.

3.0 CONCLUSION

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: R. Lasky

Dated: August 9, 1988