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SCE&G®
A SCANA COMPANY

August 20, 2001
RC-01-0146

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

Attention: R. R. Assa

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
TECHNICAL SPECIFICATION CHANGE REQUEST TSP 01-0262
REVISION OF TABLE 3.3-3, ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION - FOOTNOTES

Reference:
1. USNRC Standard Technical Specifications, Westinghouse Plants, NUREG-1431, Volume 1, Revision 2, April 2001
2. Licensee Event Report, LER 2001-002-00, Inappropriate Mode Change During RTD Cross Calibration of the Reactor Protection System

South Carolina Electric & Gas Company (SCE&G), acting for itself and as agent for South Carolina Public Service Authority, hereby requests an amendment to the Virgil C. Summer Nuclear Station (VCSNS) Technical Specifications (TS) in accordance with 10CFR50.90. This proposed amendment will add a footnote regarding the applicable modes for Steam Line Isolation and Engineered Safety Feature Actuation System functions to Table 3.3-3.

The referenced improved Standard Technical Specifications (ITS) provides footnote (h) for ITS Table 3.3.2-1 which excludes operability of the Steam Line Isolation Function in Modes 1, 2, or 3 if the main steam line isolation valves (MSIVs) are closed. This exception allows surveillance testing of the Engineered Safety Feature Actuation System (ESFAS) instrumentation associated with the various isolation functions while maintaining the plant in a safe condition.

SCE&G requests incorporation of a comparable footnote into the VCSNS TS to facilitate surveillance testing and channel calibration of the ESFAS steam line isolation instrumentation.

No change to the Bases section is required.

A001

The amendment request is contained in the following documents:

Attachment I	Explanation of Changes Summary Marked-up Technical Specification Pages Revised Technical Specification Pages
Attachment II	Safety Evaluation
Attachment III	No Significant Hazards Determination
Attachment IV	Environmental Impact Determination

This proposed TS amendment request has been reviewed by both the Plant Safety Review Committee and the Nuclear Safety Review Committee.

SCE&G requests NRC review and approval of this change to the VCSNS TS as expeditiously as possible to support implementation during refueling outage RF-13, currently scheduled for April 19, 2002.

There is one other TS change in process that will affect or be affected by this change request. Reference Stephen A. Byrne Letter (RC-00-0376) to Document Control Desk dated December 28, 2000. Pages 3/4 3-20 and 3/4 3-23 are affected.

There are no significant changes to any FSAR or FPER sections. FSAR Sections 7 and 15 were reviewed. Changes to the Sections will be implemented, as appropriate, upon approval of this request. The FPER was reviewed but was not applicable.

A copy of this application and associated attachments is being provided to the designated South Carolina State official in accordance with 10 CFR 50.91.

I certify under penalty of perjury that the foregoing is true and correct.

Should you have questions, please call Mr. Jim Turkett at (803) 345-4047.

Very truly yours,

Stephen A. Byrne

JT/SAB
Attachment(s): 4

c: N. O. Lorick
N. S. Carns
T. G. Eppink (w/o Attachments)
R. J. White
L. A. Reyes
W. R. Higgins
NRC Resident Inspector
P. Ledbetter
K. M. Sutton
T. P. O'Kelley
RTS (TSP 01-0262)
File (813.20)
DMS (RC-01-0146)

STATE OF SOUTH CAROLINA :
: **TO WIT** :
COUNTY OF FAIRFIELD :

I hereby certify that on the 20th day of August 2001, before me, the subscriber, a Notary Public of the State of South Carolina personally appeared Stephen A. Byrne, being duly sworn, and states that he is Senior Vice President, Nuclear Operations of the South Carolina Electric & Gas Company, a corporation of the State of South Carolina, that he provides the foregoing response for the purposes therein set forth, that the statements made are true and correct to the best of his knowledge, information, and belief, and that he was authorized to provide the response on behalf of said Corporation.

WITNESS my Hand and Notarial Seal

James W. Turkett
Notary Public

My Commission Expires

10-2-2010
Date

Attachment to License Amendment No. XXX
To Facility Operating License No. NPF-12
Docket No. 50-395

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove Pages	Insert Pages
3/4 3-19	3/4 3-19
3/4 3-20	3/4 3-20
3/4 3-22	3/4 3-22
3/4 3-23	3/4 3-23

SCE&G -- EXPLANATION OF CHANGES

Page	Affected Section	Bar #	Description of Change	Reason for Change
3/4 3-19	Table 3.3-3	1	Insert ### for Mode 3 under APPLICABLE MODES column.	To facilitate surveillance and calibration of MS isolation instrumentation in Mode 3 below the P-12 setpoint.
3/4 3-20	Table 3.3-3	1	Insert ### for Mode 3 under APPLICABLE MODES column.	To facilitate surveillance and calibration of MS isolation instrumentation in Mode 3 below the P-12 setpoint.
3/4 3-22	Table 3.3-3	1	Insert ### for Mode 3 under APPLICABLE MODES column.	To support cross calibration of RCS RTDs during transition from Mode 4 to 3.
3/4 3-23	Table 3.3-3	1	Add ### under TABLE NOTATION.	Footnote to identify that instrument Operability is N/A when MSIVs are closed below the P-12 setpoint.

TABLE 3.3-3 (Continued)

ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION

FUNCTIONAL UNIT	TOTAL NO. OF CHANNELS	CHANNELS TO TRIP	MINIMUM CHANNELS OPERABLE	APPLICABLE MODES	ACTION
4. STEAM LINE ISOLATION					
a. Manual					
i. One Switch/line	1/steam line	1/steam line	1/operating steam line	1, 2, 3###	23
ii. One Switch/all lines	1	1	1	1, 2, 3###	23
b. Automatic Actuation Logic and Actuation Relays	2	1	2	1, 2, 3###	21
c. Reactor Building Pressure--High-2	3	2	2	1, 2, 3###	24*
d. Steam Flow in Two Steam Lines--High	2/steam line	1/steam line any 2 steam lines	1/steam line	1, 2, 3###	24*
COINCIDENT WITH T_{avg}--Low-Low	1 T_{avg}/loop	1 T_{avg} any 2 loops	1 T_{avg} any 2 loops	1, 2, 3###	24*

TABLE 3.3-3 (Continued)

ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION

FUNCTIONAL UNIT	TOTAL NO. OF CHANNELS	CHANNELS TO TRIP	MINIMUM CHANNELS OPERABLE	APPLICABLE MODES	ACTION
e. Steam Line Pressure-Low	1 pressure/loop	1 pressure any 2 loops	1 pressure any 2 loops	1, 2, 3## *##	24*
5. TURBINE TRIP & FEEDWATER ISOLATION					
a. Steam Generator Water Level--High-High	3/loop	2/loop in any operating loop	2/loop in each operating loop	1, 2	24*

TABLE 3.3-3 (Continued)

ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION

FUNCTIONAL UNIT	TOTAL NO. OF CHANNELS	CHANNELS TO TRIP	MINIMUM CHANNELS OPERABLE	APPLICABLE MODES	ACTION
7. LOSS OF POWER					
a. 7.2 kv Emergency Bus Undervoltage (Loss of Voltage)	2-1/bus	1	2	1, 2, 3, 4	18
b. 7.2 kv Emergency Bus Undervoltage (Degraded Voltage)	2-1/bus	1	2	1, 2, 3, 4	18
8. AUTOMATIC SWITCHOVER TO CONTAINMENT SUMP					
a. RWST level low-low	4	2	3	1, 2, 3	16
b. Automatic Actuation Logic and Actuation Relays	2	1	2	1, 2, 3	21
9. ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INTERLOCKS					
a. Pressurizer Pressure, P-11	3	2	2	1, 2, 3	20
b. Low-Low T_{avg}, P-12	3	2	2	1, 2, 3	20
c. Reactor Trip, P-4	2	2	2	1, 2, 3	22

TABLE 3.3-3 (Continued)

TABLE NOTATION

#Trip function may be blocked in this MODE below the P-11 (Pressurizer Pressure Interlock) setpoint.

##Trip function may be blocked in this MODE below the P-12 (Low-Low Tavg Interlock) setpoint.

Except when below P-12 with all MSIVs and bypasses closed and disabled.

*The provisions of Specification 3.0.4 are not applicable.

ACTION STATEMENTS

ACTION 14 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, restore the inoperable channel to OPERABLE status within 6 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours; however, one channel may be bypassed for up to 4 hours for surveillance testing per Specification 4.3.2.1, provided the other channel is OPERABLE.

ACTION 15 - DELETED

ACTION 16 - With the number of OPERABLE channels one less than the Total Number of Channels operation may proceed provided the inoperable channel is placed in the bypassed condition and the Minimum Channels OPERABLE requirement is met. One additional channel may be bypassed for up to 4 hours for surveillance testing per Specification 4.3.2.1.

ACTION 17 - With less than the Minimum Channels OPERABLE requirement, operation may continue provided the containment purge supply and exhaust valves are maintained closed.

ACTION 18 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, restore the inoperable channel to OPERABLE status within 48 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

ACTION 19 - With the number of OPERABLE channels one less than the Total Number of Channels, STARTUP and/or POWER OPERATION may proceed provided the following conditions are satisfied:

a. The inoperable channel is placed in the tripped condition within 1 hour.

b. The Minimum Channels OPERABLE requirements is met; however, the inoperable channel may be bypassed for up to 2 hours for surveillance testing of other channels per Specification 4.3.2.1.

TABLE 3.3-3 (Continued)

ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION

FUNCTIONAL UNIT	TOTAL NO. OF CHANNELS	CHANNELS TO TRIP	MINIMUM CHANNELS OPERABLE	APPLICABLE MODES	ACTION
4. STEAM LINE ISOLATION					
a. Manual					
i. One Switch/line	1/steam line	1/steam line	1/operating steam line	1, 2, 3###	23
ii. One Switch/all lines	1	1	1	1, 2, 3###	23
b. Automatic Actuation Logic and Actuation Relays	2	1	2	1, 2, 3###	21
c. Reactor Building Pressure--High-2	3	2	2	1, 2, 3###	24*
d. Steam Flow in Two Steam Lines--High	2/steam line	1/steam line any 2 steam lines	1/steam line	1, 2, 3###	24*
COINCIDENT WITH T_{avg}--Low-Low	1 T_{avg}/loop	1 T_{avg} any 2 loops	1 T_{avg} any 2 loops	1, 2, 3###	24*

TABLE 3.3-3 (Continued)

ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION

FUNCTIONAL UNIT	TOTAL NO. OF CHANNELS	CHANNELS TO TRIP	MINIMUM CHANNELS OPERABLE	APPLICABLE MODES	ACTION
e. Steam Line Pressure-Low	1 pressure/ loop	1 pressure any 2 loops	1 pressure any 2 loops	1, 2, 3##,###	24*
5. TURBINE TRIP & FEEDWATER ISOLATION					
a. Steam Generator Water Level-- High-High	3/loop	2/loop in any operating loop	2/loop in each operating loop	1, 2	24*

TABLE 3.3-3 (Continued)

ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION

FUNCTIONAL UNIT	TOTAL NO. OF CHANNELS	CHANNELS TO TRIP	MINIMUM CHANNELS OPERABLE	APPLICABLE MODES	ACTION
7. LOSS OF POWER					
a. 7.2 kv Emergency Bus Undervoltage (Loss of Voltage)	2-1/bus	1	2	1, 2, 3, 4	18
b. 7.2 kv Emergency Bus Undervoltage (Degraded Voltage)	2-1/bus	1	2	1, 2, 3, 4	18
8. AUTOMATIC SWITCHOVER TO CONTAINMENT SUMP					
a. RWST level low-low	4	2	3	1, 2, 3	16
b. Automatic Actuation Logic and Actuation Relays	2	1	2	1, 2, 3	21
9. ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INTERLOCKS					
a. Pressurizer Pressure, P-11	3	2	2	1, 2, 3	20
b. Low-Low T_{avg}, P-12	3	2	2	1, 2, 3###	20
c. Reactor Trip, P-4	2	2	2	1, 2, 3	22

TABLE 3.3-3 (Continued)

TABLE NOTATION

Trip function may be blocked in this MODE below the P-11 (Pressurizer Pressure Interlock) setpoint.

Trip function may be blocked in this MODE below the P-12 (Low-Low T_{avg} Interlock) setpoint.

Except when below P-12 with all MSIVs and bypasses closed and disabled.

* The provisions of Specification 3.0.4 are not applicable.

ACTION STATEMENTS

ACTION 14 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, restore the inoperable channel to OPERABLE status within 6 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours; however, one channel may be bypassed for up to 4 hours for surveillance testing per Specification 4.3.2.1, provided the other channel is OPERABLE.

ACTION 15 - DELETED

ACTION 16 - With the number of OPERABLE channels one less than the Total Number of Channels operation may proceed provided the inoperable channel is placed in the bypassed condition and the Minimum Channels OPERABLE requirement is met. One additional channel may be bypassed for up to 4 hours for surveillance testing per Specification 4.3.2.1.

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ACTION 19 - With the number of OPERABLE channels one less than the Total Number of Channels, STARTUP and/or POWER OPERATION may proceed provided the following conditions are satisfied:

a. The inoperable channel is placed in the tripped condition within 1 hour.

b. The Minimum Channels OPERABLE requirements is met; however, the inoperable channel may be bypassed for up to 2 hours for surveillance testing of other channels per Specification 4.3.2.1.

SAFETY EVALUATION FOR REVISING SPECIFICATION TABLE 3.3-3 OF THE VIRGIL C. SUMMER NUCLEAR STATION TECHNICAL SPECIFICATIONS

Description of Amendment Request

South Carolina Electric & Gas Company (SCE&G) proposes a change to the Virgil C. Summer Nuclear Station (VCSNS) Technical Specifications (TS) Surveillance Requirements to revise Table 3.3-3. This revision will allow VCSNS to exclude Engineered Safety Feature Actuation System (ESFAS) steam line isolation instrumentation operability in Mode 3 when the main steam isolation valves (MSIVs), along with associated bypass valves, are closed and disabled, and ease the restriction of Specification 3.0.4 when performing reactor coolant system (RCS) resistance temperature device (RTD) cross calibrations at temperatures below the ESFAS P-12 Interlock for Low-Low T_{avg}. This proposed amendment will add a footnote to Table 3.3-3 for Function 4.a through 4.e regarding the applicable modes for Steam Line Isolation functions and to Function 9.b regarding the applicable modes for P-12 Operability. Implementation of the proposed revision to Function 9.b will allow the RCS narrow range temperature channels to remain in test, with test equipment installed, during the progression from Mode 4 to 3.

This request is consistent in part with USNRC Standard Technical Specifications, Westinghouse Plants, NUREG-1431, Volume 1, Revision 1, April 1995. The improved Standard Technical Specifications (ITS) provides footnote (h) for ITS Table 3.3.2-1 which excludes operability of the Steam line Isolation Function in Modes 1, 2, or 3 if the main steam line isolation valves (MSIVs) are closed. This exception allows surveillance testing of the ESFAS instrumentation associated with the various isolation functions while maintaining the plant in a safe condition. Also, ITS Table 3.3.2-1 for Function 4.e, High Steam Flow in Two Steam Lines, indicates operability for the coincident low-low T_{avg} applies above the P-12 setpoint.

Safety Evaluation

The incorporation of a footnote for Functions 4.a through 4.e to Table 3.3-3 is in agreement with the note in ITS. The VCSNS TS note provides an exception to the Mode 3 applicability for the ESFAS main steam isolation functions. This instrumentation function actuation causes the main steam isolation valves to close, isolating the main steam lines. Through this exception, the isolation function does not have to be operable in Mode 3 below the P-12 setpoint when the main steam isolation valves and bypass valves are closed and disabled. This exception is reasonable since the safety function of the actuation system (main steam isolation) is already accomplished. Closing the MSIVs accomplishes the intended safety function of isolating the main steam line.

Following a plant outage, the RCS RTDs (i.e., both narrow range and wide range) are cross calibrated during isothermal plant conditions to verify proper operation. Typically, test circuitry is installed in Mode 4 and RCS temperature data is collected at several temperature plateaus (e.g., 345°F, 450°F and 550°F) below the P-12 interlock setpoint (i.e., 552°F) as the plant heats up. Narrow range RCS RTD temperature indications will not be functioning while the test circuitry is connected for this test. Wide range RTD temperature indication will be interrupted during the connection of test circuitry and momentarily, one RTD at a time, during data collection. Data is taken simultaneously for all the narrow range RTDs in order to optimize the cross calibration procedure.

The qualifying note, when applied to Function 9.b, supports continuous performance of RTD cross calibration on all narrow range RCS temperature channels associated with T_{avg}. As indicated above, the testing is initiated in Mode 4 and is not adequately accomplished until Mode 3. Incorporation of this footnote will allow all narrow range channels to remain in test, with test circuitry installed, during the progression from Mode 4 to 3 (i.e., at 350°F). With the RCS temperature channels in test, the P-12 interlock becomes inoperable due to the loss of automatic reset capability.

As discussed in Section B3/4.3 of the Technical Specifications, the ESFAS P-12 Interlock performs the following functions:

> "On increasing primary loop temperature, P-12 automatically reinstates safety injection actuation and steam line isolation on low steam line pressure, and removes a blocking signal from the steam dump system. On decreasing primary coolant loop temperature, P-12 allows the manual block of safety injection and steam line isolation on low steam line pressure and automatically provides a blocking signal to the steam dump valves."

These functions are not compromised by the proposed change since:

1. The steam line isolation function is accomplished.
2. With the steam lines isolated, steam dump is effectively isolated from the primary system.
3. The Steam Line Pressure - Low SAFETY INJECTION function, per footnote ## to TS Table 3.3-3, may be blocked in Mode 3 below the P-12 setpoint.

Via administrative controls, the RCS RTD cross calibrations will be conducted below the P-12 interlock setpoint, thus allowing the P-12 interlock to be returned to an operable status prior to operation at or above the P-12 setpoint. Therefore, the proposed change does not result in an adverse impact on the ESFAS functions and, consequently, on safety analysis assumptions.

Pursuant to the above information, the proposed TSCR does not involve a significant reduction in the margin of safety.

NO SIGNIFICANT HAZARDS DETERMINATION FOR REVISING SPECIFICATION TABLE 3.3-3 OF THE VIRGIL C. SUMMER NUCLEAR STATION TECHNICAL SPECIFICATIONS

Description of Amendment Request

South Carolina Electric & Gas Company (SCE&G) proposes a change to the Virgil C. Summer Nuclear Station (VCSNS) Technical Specifications (TS) Surveillance Requirements to revise Table 3.3-3. This revision will allow VCSNS to exclude Engineered Safety Feature Actuation System (ESFAS) steam line isolation instrumentation operability in Mode 3 when the main steam isolation valves (MSIVs), along with associated bypass valves, are closed and disabled, and ease the restriction of Specification 3.0.4 when performing reactor coolant system (RCS) resistance temperature device (RTD) cross calibrations at temperatures below the ESFAS P-12 Interlock for Low-Low T_{avg}. This proposed amendment will add a footnote to Table 3.3-3 for Function 4.a through 4.e regarding the applicable modes for Steam Line Isolation functions and to Function 9.b regarding the applicable modes for P-12 Operability. Implementation of the proposed revision to Function 9.b will allow the RCS narrow range temperature channels to remain in test, with test equipment installed, during the progression from Mode 4 to 3.

This request is consistent in part with USNRC Standard Technical Specifications, Westinghouse Plants, NUREG-1431, Volume 1, Revision 1, April 1995. The improved Standard Technical Specifications (ITS) provides footnote (h) for ITS Table 3.3.2-1 which excludes operability of the Steam line Isolation Function in Modes 1, 2, or 3 if the main steam line isolation valves (MSIVs) are closed. This exception allows surveillance testing of the ESFAS instrumentation associated with the various isolation functions while maintaining the plant in a safe condition. Also, ITS Table 3.3.2-1 for Function 4.e, High Steam Flow in Two Steam Lines, indicates operability for the coincident low-low T_{avg} applies above the P-12 setpoint.

Basis for No Significant Hazards Consideration Determination

South Carolina Electric & Gas Company (SCE&G) has evaluated the proposed changes to the VCSNS TS described above against the significant Hazards Criteria of 10CFR50.92 and has determined that the changes do not involve any significant hazard. The following is provided in support of this conclusion.

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   This proposed changes involve upgrading the VCSNS TS to more closely agree with ITS and does not result in any hardware changes. The proposed change revises the applicability for the initiating functions of the main steam isolation function such that when a main steam line isolation valve is closed and the isolation function is accomplished, the automatic initiation of this function is no longer required to be operable. The ESFAS is not assumed to be an initiator of any analyzed event. The role of the ESFAS is in mitigating and thereby limiting the consequences of accidents. The proposed change continues to adequately ensure the operability of the ESFAS main steam line isolation function when the lines are unisolated and thereby ensures the protection provided by the function remains operable when required. The relaxation of the P-12 Function during RCS RTD cross calibration allows all associated narrow range temperature channels to remain in test, with test circuitry installed, during the transition between Modes 4 and 3. Surveillance performance is administratively controlled by plant procedures which assure testing is conducted below the ESFAS P-12 interlock setpoint of 552°F and that TS limits for mode operability are not exceeded. Therefore, the results of the analyses described in the FSAR remain bounding. Additionally, the proposed change does not impose any new safety analyses limits or alter the plant's ability to detect or mitigate events. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

   The proposed changes involve upgrading the ESFAS area of the VCSNS TS to more closely agree with ITS and to support RCS RTD cross calibration. The changes do not necessitate a physical alteration of the plant (no new or different type of equipment will be installed) or changes in parameters governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does this change involve a significant reduction in margin of safety?

The proposed change, which upgrades the ESFAS area of the VCSNS TS to be more consistent with ITS and supports RCS RTD cross calibration, does not have an adverse impact on any design basis safety analysis. In combination with administrative controls, required safety functions will continue to be accomplished in accordance with safety analysis assumptions. As such, the results of the analyses described in the FSAR remain bounding. Thus assuring the proposed change does not involve a significant reduction in margin of safety.

Pursuant to 10 CFR 50.91, the preceding analyses provides a determination that the proposed Technical Specifications change poses no significant hazard as delineated by 10 CFR 50.92.

ENVIRONMENTAL IMPACT DETERMINATION FOR REVISING SPECIFICATION TABLE 3.3-3 OF THE VIRGIL C. SUMMER NUCLEAR STATION TECHNICAL SPECIFICATIONS

Environmental Assessment

This proposed Technical Specification change has been evaluated against criteria for and identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. It has been determined that the proposed change meets the criteria for categorical exclusion as provided for under 10 CFR 51.22(c)(9). The following is a discussion of how the proposed Technical Specification change meets the criteria for categorical exclusion.

10 CRF 51.22(c)(9): The proposed change provides an exception to steam line isolation function channel operability when main steam isolation valves are closed and supports RCS RTD cross calibration below the P-12 Interlock,

(I) the proposed change involves No Significance Hazards Consideration (refer to No Significance Hazards Evaluation);

(ii) there are no significant changes in the types or significant increase in the amounts of any effluents that may be released offsite since the proposed change does not affect the generation of any radioactive effluents nor does it affect any of the permitted release paths; and

(iii) there is no significant increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Based on the aforementioned information and pursuant to 10 CFR 51.22(b), no environmental assessment or environmental impact statement need be prepared in connection with issuance of an amendment to the Technical Specifications incorporating the proposed change.