August 10, 1~92

Docket Nos. 50-338 and 50-339

> Mr. W. L. Stewart Senior Vice President - Nuclear Virginia Electric and Power Company 5000 Dominion Blvd. Glen Allen. Virginia 23060

Dear Mr. Stewart:

SUBJECT: NORTH ANNA UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS RE: REACTOR TRIP SYSTEM INSTRUMENTATION (TAC NOS. M83752 AND M83753)

The Commission has issued the enclosed Amendment Nos. 165 and 145 to Facility Operating License Nos. NPF-4 and NPF-7 for the North Anna Power Station, Units No. 1 and No. 2 (NA-1&2). The amendments revise the Technical Specifications (TS) in response to your letter dated June 8, 1992.

The amendments revise the current NA-1&2 TS to permit staggered testing of the reactor trip system instrumentation and allow up to 2 hours to test certain emergency safeguards feature actuation system instrumentation.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly <u>Federal</u> <u>Register</u> notice.

Sincerely,

/s/

Leon B. Engle, Project Manager Project Directorate II-2 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

| Enclosures: 1. Amendment No.165 to NPF-4 2. Amendment No.145 to NPF-7 3. Safety Evaluation | | | | | |
|---|-------|-----------|-----------------|------|----|
| cc w/enclosures: See next page | | | | | |
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Mr. W. L. Stewart Virginia Electric & Power Company

cc: Mr. William C. Porter, Jr. County Administrator Louisa County P.O. Box 160 Louisa, Virginia 23093

Michael W. Maupin, Esq. Hunton and Williams P.O. Box 1535 Richmond, Virginia 23212

Dr. W. T. Lough Virginia State Corporation Commission Division of Energy Regulation P.O. Box 1197 Richmond, Virginia 23209

Old Dominion Electric Cooperative 4201 Dominion Blvd. Glen Allen, Virginia 23060

Mr. E. Wayne Harrell Vice President - Nuclear Services Virginia Electric and Power Co. 5000 Dominion Blvd. Glen Allen, Virginia 23060

Office of the Attorney General Supreme Court Building 101 North 8th Street Richmond, Virginia 23219

Senior Resident Inspector North Anna Power Station U.S. Nuclear Regulatory Commission Route 2, Box 78 Mineral, Virginia 231172 North Anna Power Station Units 1 and 2

C.M.G. Buttery, M.D., M.P.H. State Health Commissioner Office of the Commissioner Virginia Department of Health P.O. Box 2448 Richmond, Virginia 23218

Regional Administrator, RII U.S. Nuclear Regulatory Commission 101 Marietta Street, N.W., Suite 2900 Atlanta, Georgia 30323

Mr. G. E. Kane, Manager North Anna Power Station P.O. Box 402 Mineral, Virginia 23117

Mr. J. P. O'Hanlon Vice President - Nuclear Operations Virginia Electric and Power Company 5000 Dominion Blvd. Glen Allen, Virginia 23060

Mr. Martin Bowling Manager - Nuclear Licensing Virginia Electric and Power Co. 5000 Dominion Blvd. Glen Allen, Virginia 23060 DATED: _____August 10, 1992

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AMENDMENT NO. 165 TO FACILITY OPERATING LICENSE NO. NPF-4-NORTH ANNA UNIT 1 AMENDMENT NO. 145 TO FACILITY OPERATING LICENSE NO. NPF-7-NORTH ANNA UNIT 2 Docket File NRC & Local PDRs PDII-2 Reading S. Varga, 14/E/4 G. Lainas, 14/H/3 H. Berkow D. Miller L. Engle OGC D. Hagan, 3302 MNBB G. Hill (8), P-137 Wanda Jones, MNBB-7103 C. Grimes, 11/F/23 ACRS (10) OPA OC/LFMB M. Sinkule, R-II



UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555

VIRGINIA ELECTRIC AND POWER COMPANY

OLD DOMINION ELECTRIC COOPERATIVE

DOCKET NO. 50-338

NORTH ANNA POWER STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 165 License No. NPF-4

- The Nuclear Regulatory Commission (the Commission) has found that: 1.
 - Α. The application for amendment by Virginia Electric and Power Company et al., (the licensee) dated June 8, 1992, 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:
 - Β. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - С. 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
 - Ε. 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.

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- 2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.D.(2) of Facility Operating License No. NPF-4 is hereby amended to read as follows:
 - (2) <u>Technical Specifications</u>

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 165, 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 its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

hut Herbert N. Berkow, Director

Project Directorate II-2 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: August 10, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 165

TO FACILITY OPERATING LICENSE NO. NPF-4

DOCKET_NO. 50-338

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

| <u>Remove Pages</u> | <u>Insert Pages</u> |
|---------------------|---------------------|
| 3/4 3-13 | 3/4 3-13 |
| 3/4 3-22 | 3/4 3-22 |

TABLE 4.3-1 (Continued)

NOTATION

- With the reactor trip system breakers closed and the control rod drive system capable of rod withdrawal.
- (1) If not performed in previous 7 days.
- (2) Heat balance only, above 15% of RATED THERMAL POWER.
- (3) Compare incore to excore axial offset above 15% of RATED THERMAL POWER. Adjust channel if absolute difference > 3 percent.
- (4) Manual ESF functional input check every 18 months.
- (5) Each train or logic channel shall be tested at least every 62 days on a STAGGERED TEST BASIS.
- (6) Neutron detectors may be excluded from CHANNEL CALIBRATION.
- (7) The CHANNEL FUNCTIONAL TEST shall independently verify the OPERABILITY of the undervoltage and shunt trip circuits for the manual reactor trip function. The test shall also verify the operability of the Bypass Breaker Trip circuit(s).
- (8) Local manual shunt trip prior to placing the bypass breaker into service.
- (9) Automatic undervoltage trip.
- (10) The CHANNEL FUNCTIONAL TEST shall independently verify the OPERABILITY of the undervoltage and shunt trip attachments of the Reactor Trip Breakers.

TABLE 4.3-1 (Continued)

REACTOR TRIP SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

| FUN | ICTIONAL LINIT | CHANNEL CHECK | CHANNEL CALIBRATION | CHANNEL FUNCTIONAL <u>TEST</u> | MODES IN WHICH SURVEILLANCE |
|-----|--|------------------|------------------------|--------------------------------------|------------------------------------|
| 13 | . Loss of Flow - Two Loops | S | R | NA. | 1 |
| 14 | . Steam Generator Water Level – Low-Low | S | R | м | 1, 2 |
| 15 | . Steam/Feedwater Flow Mismatch and Low Steam Generator Water Level | S | R | м | 1, 2 |
| 16. | Undervoltage – Reactor Coolant Pump Busses | N.A. | R | NA. | 1 |
| 17. | Underfrequency – Reactor Coolant Pump Busses | N.A. | R | N.A. | 1 |
| 18. | Turbine Trip | | | | |
| | A. Low Auto Stop Oil Pressure | N.A. | NA | 8/11/1) | |
| | B. Turbine Stop Valve Closure | N.A. | NA. | S/U(1) | 1, 2 |
| 19. | Safety Injection Input from ESF | N.A. | N.A. | M(4) & (5) | 1, 2 |
| 20. | Reactor Coolant Pump Breaker Position Trip | N.A. | N.A. | R | N.A . |
| 21. | A. Reactor Trip Breaker | N.A. | N.A. | M(5) (8) # (10) | |
| | B. Reactor Trip Bypass Breaker | N.A. | N.A. | M(5), (8), & R(9) | ·1, 2, & • |
| 22. | Automatic Trip Logic | • N.A. | N.A. | M(5) | 1, 2, & • |

TABLE 3.3-3 (Continued)

TABLE NOTATION

[#]Trip function may be blocked in this MODE below P-11.

^{##}Trip function may be blocked in this MODE below P-12.

The channel(s) associated with the protective functions derived from the out of service Reactor Coolant Loop shall be placed in the tripped mode.

The provisions of Specification 3.0.4 are not applicable.

ACTION STATEMENTS

- ACTION 13 With the number of OPERABLE Channels one less than the Total Number of Channels, be in HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours; however, one channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1.
- ACTION 14 With the number of OPERABLE Channels one less than the Total Number of Channels, operation may proceed until performance of the next required CHANNEL FUNCTIONAL TEST, provided the inoperable channel is placed in the tripped condition within 1 hour.
- ACTION 15 With a channel associated with an operating loop inoperable, restore the inoperable channel to OPERABLE status within 2 hours or be in HOT SHUTDOWN within the following 12 hours; however, one channel associated with an operating loop may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1.
- 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 blocked condition and the Minimum Channels OPERABLE requirement is demonstrated within 1 hour; one additional channel may be blocked for up to 2 hours for surveillance testing per Specification 4.3.2.1.1.

3/4 3-21

TABLE 3.3-3 (Continued)

- ACTION 17 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 tripped condition within 1 hour and the Minimum Channels OPERABLE requirement is met. One additional channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1.
- ACTION 18 With the number of OPERABLE Channels one less than the Total Number of Channels, 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 requirement is met; however, one additional channel may be bypassed for up to 2 hours for suppliance testing per Specification 4.3.2.1.1.
- ACTION 20 With the number of OPERABLE Channels one less than the Total Number of Channels, be in at least HOT STANDBY within 6 hours and at least HOT SHUTDOWN within the following 6 hours; however, one channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1 provided the other Channel is OPERABLE.
- ACTION 21 With the number of OPERABLE Channels one less than the Total Number of Channels, restore the inoperable Channel to OPERABLE status within 48 hours or be in at least HOT STANDBY within the next 6 hours and in at least HOT SHUTDOWN within the j following 6 hours.

NORTH ANNA - UNIT 1

Amendment No. 46, 33, 165



UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555

VIRGINIA ELECTRIC AND POWER COMPANY

OLD DOMINION ELECTRIC COOPERATIVE

DOCKET NO. 50-339

NORTH ANNA POWER STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 145 License No. NPF-7

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Virginia Electric and Power Company et al., (the licensee) dated June 8, 1992, 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 2.C.(2) of Facility Operating License No. NPF-7 is hereby amended to read as follows:
 - (2) <u>Technical Specifications</u>

The Technical Specifications contained in Appendices A and B, as revised through Amendment No.145 , 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 its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

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Herbert N. Berkow, Director Project Directorate II-2 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: August 10, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 145

TO FACILITY OPERATING LICENSE NO. NPF-7

DOCKET NO. 50-339

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

| <u>Remove Pages</u> | <u>Insert Pages</u> |
|---------------------|---------------------|
| 3/4 3-13 | 3/4 3-13 |
| 3/4 3-23 | 3/4 3-23 |

TABLE 4.3-1 (Continued)

REACTOR TRIP SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

| EUN | ICTIONAL UNIT | CHANNEL CHECK | CHANNEL CALIBRATION | CHANNEL FUNCTIONAL | MODES IN WHICH SURVEILLANCE |
|-----|--|------------------|------------------------|---------------------------|------------------------------------|
| 13 | . Loss of Flow - Two Loops | S | R | N.A. | 1 (|
| 14 | . Steam Generator Water Level – Low-Low | S | R | м | 1, 2 |
| 15 | . Steam/Feedwater Flow Mismatch and Low Steam Generator Water Level | S | Ŕ | м | 1, 2 |
| 16. | Undervoltage - Reactor Coolant Pump Busses | N.A. | R | м | 1 |
| 17. | Underfrequency – Reactor Coolant Pump Busses | N.A. | R | м | 1 |
| 18. | Turbine Trip | | | | |
| | A. Low Auto Stop Oil Pressure | N.A. | N.A. | S/II(1) | N A |
| | B. Turbine Stop Valve Closure | N.A. | N.A. | S/U(1) | N.A. |
| 19. | Safety Injection Input from ESF | N.A. | N.A. | M(4) & (5) | 1, 2 |
| 20. | Reactor Coolant Pump Breaker Position Trip | N.A. | N.A . | R | 1 |
| 21. | A Reactor Trip Breaker | N.A. | N.A. | M(5) (9) & (11) | 1 2 |
| | B. Reactor Trip Bypass Breaker | N.A. | N.A. | M(5), (9), & R(10) | 1, 2, & * |
| 22. | Automatic Trip Logic | N.A. | N.A. | M(5) | 1, 2, & • |

<u>IABLE 4.3~1 (Continued)</u>

NOTATION

- With the reactor trip system breakers closed and the control rod drive system capable of rod withdrawal.
- (1) If not performed in previous 7 days.
- (2) Heat balance only, above 15% of RATED THERMAL POWER. Adjust channel if absolute difference >2 percent.
- (3) Compare incore to excore axial offset above 15% of RATED THERMAL POWER. Recalibrate if absolute difference >3 percent.
- (4) Manual ESF functional input check every 18 months.
- (5) Each train or logic channel shall be tested at least every 62 days on a STAGGERED TEST BASIS.
- (6) Neutron detectors may be excluded from CHANNEL CALIBRATION.
- (7) Below the P-6, (Block of Source Range Reactor Trip) Setpoint.
- (8) The CHANNEL FUNCTIONAL TEST shall independently verify the OPERABILITY of the undervoltage and shunt trip circuits for the Manual Reactor Trip Function. The test shall also verify OPERABILITY of the Bypass Breaker trip circuit(s).
- (9) Local manual shunt trip prior to placing the bypass breaker into service.
- (10) Automatic undervoltage trip.
- (11) The CHANNEL FUNCTIONAL TEST shall independently verify the OPERABILITY of the undervoltage and shunt trip attachments of the Reactor Trip Breakers.

NORTH ANNA - UNIT 2

TABLE 3.3-3 (Continued)

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- ACTION 17 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 tripped condition within 1 hour and the Minimum Channels OPERABLE requirement is met. One [additional channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1.
- ACTION 18 With the number of OPERABLE Channels one less than the Total Number of Channels, 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 requirement is met; however, one additional channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1.
- ACTION 20 With the number of OPERABLE Channels one less than the Total Number of Channels, be in at least HOT STANDBY within 6 hours, and at least HOT SHUTDOWN within the following 6 hours; however, one channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1 provided the other Channel is OPERABLE.
- ACTION 21 With the number of OPERABLE Channels one less than the Total Number of Channels, restore the inoperable Channel to OPERABLE status within 48 hours or be in at least HOT STANDBY within the next 6 hours and in at least HOT SHUTDOWN within the following 6 hours.

NORTH ANNA - UNIT 2

Amendment No. 145

TABLE 3.3-3 (Continued)

ENGINEERED SAFETY FEATURE INTERLOCKS

| DESIGNATION | CONDITION | SETPOINT | ALLOWABLE VALUES | FUNCTION |
|-------------|--|-----------------|-----------------------|--|
| P-11 | With 2 of 3 pressurizer pressure channels above setpoint | 2000 psig | <u><</u> 2010 psig | P-ll prevents manual block of safety injection actuation on low-low pressurizer pressure. |
| | With 2 of 3 pressurizer pressure channels below setpoint | 1980 psig | <u><</u> 1990 psig | P-ll allows manual block of safety injection actuation on low-low pressurizer pressu |
| P-12 | With 2 of 3 T channels avg above setpoint | 543°F (Nominal) | <u>≺</u> 545°F | P-12 prevents manual block of safety injection actuation on high steam line flow. |
| | With 2 of 3 T channels avg below setpoint | 543°F (Nominal) | <u>≥</u> 541°F | P-12 allows manual block of safety injection actuation an high steam line flow. |

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 165 AND 145 TO

FACILITY OPERATING LICENSE NOS. NPF-4 AND NPF-7

VIRGINIA ELECTRIC AND POWER COMPANY

OLD DOMINION ELECTRIC COOPERATIVE

NORTH ANNA POWER STATION, UNITS NO. 1 AND NO. 2

DOCKET NOS. 50-338 AND 50-339

1.0 INTRODUCTION

By letter dated June 8, 1992, the Virginia Electric and Power Company (the licensee) proposed changes to the Technical Specifications (TS) for the North Anna Power Station, Units No. 1 and No. 2 (NA-1&2). The proposed changes are being made to TS 4.3.1.1.1, "Reactor Trip System Instrumentation," Table 4.3-1, Item 19 and TS 3.3.2.1, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," Table 3.3-3, Action 20. Currently, Table 4.3-1, Item 19 requires that the safety injection input from the engineered safety feature (ESF) logic function be tested on a monthly basis. The proposed change would add Notation 5 and increase the surveillance interval from monthly (every 31 days) to every 62 days on a staggered test basis. Table 3.3-3, Action 20 allows bypassing one channel for testing purposes for 1 hour. The proposed change would increase the time that a channel may be bypassed for testing purposes from 1 to 2 hours. Also, several administrative changes would be made to the TS to provide consistency and clarity. A discussion of the proposed changes and the staff's evaluation are provided below.

2.0 DISCUSSION

There are two trains of reactor trip system (RTS) and ESFAS instrumentation for both NA-1&2. The two trains of instrumentation are verified operable by performing surveillance procedures PT-36.1A and PT-36.1B, "Solid State Protection System Test." These tests place one train of the solid state protection system (SSPS) in bypass and test the inputs and outputs to ensure that the train is operable. Specifically, the safety injection input from ESF, auxiliary feedwater pump start automatic actuation logic and steam line isolation automatic actuation logic functions are proven operable by these tests.

TS 3.3.1.1 requires that the RTS instrumentation channels and interlocks of Table 3.3-1 be operable with response times as shown in Table 3.3-2. The safety injection input from ESF function is part of the RTS instrumentation.

Recently, the licensee conducted a review to ensure that surveillance requirements are incorporated into appropriate surveillance test procedures. During this review, the licensee determined that TS 4.3.1.1.1 requires testing both trains of safety injection input from ESF logic each month. Since that time, both trains of SSPS have been tested each month in order to meet the surveillance requirement.

TS 3.3.2.1 requires that the ESFAS instrumentation channels shown in Table 3.3-3 are operable with the trip setpoints set consistent with the values shown in the trip setpoint column of Table 3.3-4 and with response times as shown in Table 3.3-5. The auxiliary feedwater pump start automatic actuation logic functions are part of the ESFAS instrumentation. It was determined during the licensee's recent review that Table 3.3-3, Action 20 did not allow adequate time to perform the required monthly testing of either the auxiliary feedwater pump start automatic actuation logic function for NA-1&2, or the steam line isolation logic function for NA-2. Table 3.3-3 does permit sufficient time (i.e., 2 hours) when testing the steam line isolation automatic actuation logic function for NA-1, and therefore, no change is required.

3.0 TECHNICAL SPECIFICATION CHANGES

<u>TS 4.3.1.1.1, Table 4.3-1, Item 19</u>

This change would modify TS 4.3.1.1.1, Reactor Trip System Instrumentation, Table 4.3-1, Item 19, Safety Injection Input from ESF, to increase the surveillance interval from monthly (every 31 days) to every 62 days on a staggered test basis. This is accomplished by adding Notation 5, which states "Each train or logic channel shall be tested at least every 62 days on a STAGGERED TEST BASIS," to Item 19.

The change is consistent with the requirements for the rest of the SSPS and is more stringent than the requirements of NUREG-0452, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors," Revision 4. Before the review indicated the need to perform testing on both trains each month, all testing for the SSPS was performed on a staggered test basis frequency. The frequency at which the SSPS is now being tested increases the possibility of inadvertent actuations and decreases the amount of time that both trains of SSPS are operable. Testing on a staggered test basis is adequate to ensure the continued reliability of the system, limit the possibility of inadvertent actuations, and maximize the amount of time that both trains of SSPS are operable.

<u>TS 4.3.1.1.1, Table 4.3-1, Items 21 and 22</u>

The word "and" has been changed to "&" in several places for consistency.

<u>TS 3.3.2.1, Table 3.3-3, Action 17</u>

The statement consists of two independent statements that have been spliced together with a comma. This change will substitute a period for the comma and capitalize the next word.

TS 3.3.2.1, Table 3.3-3, Action 19

The word "requirements" is changed to singular to agree with the verb.

<u>TS 3.3.2.1, Table 3.3-3, Action 20</u>

This change modifies TS 3.3.2.1, Table 3.3-3, Action 20, to allow a channel to be bypassed for up to 2 hours for testing purposes.

The monthly channel functional test requirement is met by implementing surveillance procedures PT-36.1A and PT-36.1B, "Solid State Protection System Test." These tests place one train of SSPS in bypass and test the different inputs and outputs to ensure that the system is operable. During the time that the inputs and outputs are bypassed, the channel is inoperable. One of the actions that must be entered during this time frame is Action 20. Action 20 currently states that "With the number of OPERABLE Channels one less than the Total Number of Channels, be in at least HOT STANDBY within 6 hours and in at least HOT SHUTDOWN within the following 6 hours; however, one channel may be bypassed for up to 1 hour for surveillance testing per Specification 4.3.2.1.1 provided the other Channel is OPERABLE." However, the entire channel functional test takes between 1 and 2 hours to complete.

The proposed change is consistent with Table 3.3-3, Action 22, of NUREG-0452, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors," Revision 4. Action 22 allows the auxiliary feedwater pump start automatic actuation logic and the steam line isolation automatic actuation logic functions to by bypassed for up to 2 hours when testing in accordance with TS 4.3.2.1.1. In addition, the NRC has previously issued guidance in Generic Letter (GL) 87-09 that it is not desired to knowingly perform maintenance or a surveillance which will require entering an action statement that would cause a unit to shut down.

The change also converts "WITHIN" to lower case letters for Unit 1 only because it is not a defined term.

<u>TS 3.3.2.1, Table 3.3-3, Action 21</u>

This change will insert "the next" after "HOT STANDBY within" to clarify the fact that the 6 hours to HOT STANDBY starts after the 48 hours to restore the channel ends. This does not change the intent of the requirement.

4.0 EVALUATION

Testing the safety injection input from the ESF function on a staggered basis increases the operability time for the two trains of RTS instrumentation. Also, the consequences of allowing up to an additional hour to test each train of ESFAS logic are not significantly increased because the time spent testing is not significantly increased and the opposite train is still available to perform its design function. Finally, the proposed changes are consistent with other testing requirements and are at least as stringent as the requirements of NUREG-0452, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors," Revision 4. Based on all of the above, the staff finds the proposed changes to be acceptable.

5.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Virginia State official was notified of the proposed issuance of the amendment. The State official had no comment.

6.0 ENVIRONMENTAL CONSIDERATION

This amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding (57 FR 30264). Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

7.0 CONCLUSION

The Commission has 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) 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: Leon B. Engle

Date: August 10, 1992