

Docket No. 50-440

December 17, 1993

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Mr. Robert A. Stratman
 Vice President Nuclear - Perry
 Centerior Service Company
 P. O. Box 97, S270
 Perry, Ohio 44081

Dear Mr. Stratman:

SUBJECT: AMENDMENT NO. 53 TO FACILITY OPERATING LICENSE NO. NPF-58
 (TAC NO. M80212)

The Commission has issued the enclosed Amendment No. 53 to Facility Operating License No. NPF-58 for the Perry Nuclear Power Plant, Unit No. 1. This amendment revises the Technical Specifications (TSs) in response to your application dated March 19, 1991.

This amendment consists of three changes to Technical Specification Table 3.3.3-1, "Emergency Core cooling System Actuation Instrumentation." The first change revises ACTION 33 of the table by changing the word "valve" to "trip system," to correct an inconsistency between the Specification and the as-built configuration of the Automatic Depressurization System (ADS). The second change revises the Action Statement from the table associated with the ADS inhibit switches. The third change is editorial in nature, and provides consistency with the other two changes.

A copy of the Safety Evaluation is also enclosed. Notice of issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,

Original signed by Andrew J. Kugler
 Andrew J. Kugler, Asst. Project Manager
 Project Directorate III-3
 Division of Reactor Projects III/IV/V
 Office of Nuclear Reactor Regulation

Enclosures:

- Amendment No. 53 to License No. NPF-58
- Safety Evaluation

#93-181

OFFICE	LA:PD3-3	APM:PD3-3	SRXB:DS&A	OTSB:DORS
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OFFICE	OGC	D:PD3-3		
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DATE	12/6/93	11/17/93		

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Mr. Robert A. Stratman
Centerior Service Company

Perry Nuclear Power Plant
Unit Nos. 1 and 2

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

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY, ET AL.

DOCKET NO. 50-440

PERRY NUCLEAR POWER PLANT, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 53
License No. NPF-58

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by The Cleveland Electric Illuminating Company, Centerior Service Company, Duquesne Light Company, Ohio Edison Company, Pennsylvania Power Company, and Toledo Edison Company (the licensees) dated March 19, 1991, 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-58 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 53 are hereby incorporated into this license. The Cleveland Electric Illuminating Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

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

FOR THE NUCLEAR REGULATORY COMMISSION



Andrew J. Kugler, Asst. Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of issuance: December 17, 1993

ATTACHMENT TO LICENSE AMENDMENT NO. 53

FACILITY OPERATING LICENSE NO. NPF-58

DOCKET NO. 50-440

Replace the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. Overleaf pages are provided to maintain document completeness.

<u>Remove</u>	<u>Insert</u>
3/4 3-28	3/4 3-28
3/4 3-29	3/4 3-29
3/4 3-31	3/4 3-31

INSTRUMENTATION

3/4.3.3 EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3 The emergency core cooling system (ECCS) actuation instrumentation channels shown in Table 3.3.3-1 shall be OPERABLE with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3.3-2 and with the EMERGENCY CORE COOLING SYSTEM RESPONSE TIME as shown in Table 3.3.3-3.

APPLICABILITY: As shown in Table 3.3.3-1.

ACTION:

- a. With an ECCS actuation instrumentation channel trip setpoint less conservative than the value shown in the Allowable Values column of Table 3.3.3-2, declare the channel inoperable until the channel is restored to OPERABLE status with its trip setpoint adjusted consistent with the Trip Setpoint value.
- b. With one or more ECCS actuation instrumentation channels inoperable, take the ACTION required by Table 3.3.3-1.
- c. With either ADS trip system "A" or "B" inoperable, restore the inoperable trip system to OPERABLE status:
 1. Within 7 days, provided that the HPCS and RCIC systems are OPERABLE, or,
 2. Within 72 hours, provided either the HPCS or RCIC system is inoperable.

Otherwise, be in at least HOT SHUTDOWN within the next 12 hours and reduce reactor steam dome pressure to less than or equal to 100 psig within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.3.3.1 Each ECCS actuation instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations for the OPERATIONAL CONDITIONS and at the frequencies shown in Table 4.3.3.1-1.

4.3.3.2 LOGIC SYSTEM FUNCTIONAL TESTS and simulated automatic operation of all channels shall be performed at least once per 18 months.

4.3.3.3 The ECCS RESPONSE TIME of each ECCS trip function shown in Table 3.3.3-3 shall be demonstrated to be within the limit at least once per 18 months. Each test shall include at least one channel per trip system such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific ECCS trip system.

TABLE 3.3.3-1

EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION

<u>TRIP FUNCTION</u>	<u>MINIMUM OPERABLE CHANNELS PER TRIP FUNCTION^(a)</u>	<u>APPLICABLE OPERATIONAL CONDITIONS</u>	<u>ACTION</u>
A. <u>DIVISION 1 TRIP SYSTEM</u>			
1. <u>RHR-A (LPCI MODE) AND LPCS SYSTEM</u>			
a. Reactor Vessel Water Level - Low, Level 1	2 ^(b)	1, 2, 3, 4*, 5*	30
b. Drywell Pressure - High	2 ^(b)	1, 2, 3, 4*, 5*	30
c. LPCS Pump Discharge Flow - Low (Bypass)	1	1, 2, 3, 4*, 5*	39
d. Reactor Vessel Pressure - Low (LPCS Injection Valve Permissive)	1	1, 2, 3, 4*, 5*	31
e. Reactor Vessel Pressure - Low (LPCI Injection Valve Permissive)	1	4, 5, 1, 2, 3	32
f. LPCI Pump A Start Time Delay Relay	1	4, 5, 1, 2, 3	31
g. LPCI Pump A Discharge Flow - Low (Bypass)	1	1, 2, 3, 4*, 5*	32
h. Manual Initiation	1	1, 2, 3, 4*, 5*	31
	1	1, 2, 3, 4*, 5*	39
	1	1, 2, 3, 4*, 5*	33
2. <u>AUTOMATIC DEPRESSURIZATION SYSTEM TRIP SYSTEM "A"</u>			
a. Reactor Vessel Water Level - Low, Level 1	2 ^(b)	1, 2, 3	30
b. Manual Inhibit	1	1, 2, 3	31
c. ADS Timer	1	1, 2, 3	31
d. Reactor Vessel Water Level - Low, Level 3 (Permissive)	1	1, 2, 3	31
e. LPCS Pump Discharge Pressure - High (Permissive)	2	1, 2, 3	31
f. LPCI Pump A Discharge Pressure - High (Permissive)	2	1, 2, 3	31
g. Manual Initiation	2	1, 2, 3	31
	2	1, 2, 3	33

PERRY - UNIT 1

3/4 3-28

Amendment No.53

TABLE 3.3.3-1 (Continued)

EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION

<u>TRIP FUNCTION</u>	<u>MINIMUM OPERABLE CHANNELS PER TRIP FUNCTION^(a)</u>	<u>APPLICABLE OPERATIONAL CONDITIONS</u>	<u>ACTION</u>
B. <u>DIVISION 2 TRIP SYSTEM</u>			
1. <u>RHR B AND C (LPCI MODE)</u>			
a. Reactor Vessel Water Level - Low, Level 1	2 ^(b)	1, 2, 3, 4*, 5*	30
b. Drywell Pressure - High	2 ^(b)	1, 2, 3	30
c. Reactor Vessel Pressure - Low (LPCI Injection Valve Permissive)	1	1, 2, 3 4, 5*	31 32
d. LPCI Pump B Start Time Delay Relay	1	1, 2, 3, 4*, 5*	31
e. LPCI Pump Discharge Flow - Low (Bypass)	1/pump	1, 2, 3, 4*, 5*	39
f. Manual Initiation	1	1, 2, 3, 4, 5	33
2. <u>AUTOMATIC DEPRESSURIZATION SYSTEM TRIP SYSTEM "B"</u>			
a. Reactor Vessel Water Level - Low, Level 1	2 ^(b)	1, 2, 3	30
b. Manual Inhibit	1	1, 2, 3	31
c. ADS Timer	1	1, 2, 3	31
d. Reactor Vessel Water Level - Low, Level 3 (Permissive)	1	1, 2, 3	31
e. LPCI Pump B and C Discharge Pressure - High (Permissive)	2	1, 2, 3	31
f. Manual Initiation	2	1, 2, 3	33

TABLE 3.3.3-1 (Continued)

EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION

<u>TRIP FUNCTION</u>	<u>MINIMUM OPERABLE CHANNELS PER TRIP FUNCTION (a)</u>	<u>APPLICABLE OPERATIONAL CONDITIONS</u>	<u>ACTION</u>		
C. <u>DIVISION 3 TRIP SYSTEM</u>					
1. <u>HPCS SYSTEM</u>					
a. Reactor Vessel Water Level - Low, Level 2	4(b)	1, 2, 3, 4*, 5*	34		
b. Drywell Pressure - High ^{##}	4(b)	1, 2, 3	34		
c. Reactor Vessel Water Level - High, Level 8	4(c)	1, 2, 3, 4*, 5*	34		
d. Condensate Storage Tank Level - Low	2(d)	1, 2, 3, 4*, 5*	35		
e. Suppression Pool Water Level - High	2(d)	1, 2, 3, 4*, 5*	35		
f. HPCS Pump Discharge Pressure - High (Bypass)	1	1, 2, 3, 4*, 5*	39		
g. HPCS System Flow Rate - Low (Bypass)	1	1, 2, 3, 4*, 5*	39		
h. Manual Initiation ^{##}	1	1, 2, 3, 4*, 5*	36		
D. <u>LOSS OF POWER</u>					
1. 4.16 kv Emergency Bus Undervoltage ^{###} (Loss of Voltage)	2/bus	2/bus	2/bus	1, 2, 3, 4**, 5**	37
2. 4.16 kv Emergency Bus Undervoltage ^{###} (Degraded Voltage)	2/bus	2/bus	2/bus	1, 2, 3, 4**, 5**	38

- (a) A channel may be placed in an inoperable status for up to 2 hours during periods of required surveillance without placing the trip system in the tripped condition provided at least one other OPERABLE channel in the same trip system is monitoring that parameter.
- (b) Also actuates the associated division diesel generator.
- (c) Provides signal to close HPCS pump injection valve only.
- (d) Provides signal to HPCS pump suction valves only.
- * When the system is required to be OPERABLE per Specification 3.5.2 or 3.5.3.
- ** Required when ESF equipment is required to be OPERABLE.
- # Not required to be OPERABLE when reactor steam dome pressure is less than or equal to 100 psig.
- ## The injection function of Drywell Pressure - High and Manual Initiation are not required to be OPERABLE with indicated reactor vessel water level on the wide range instrument greater than the Level 8 setpoint coincident with the reactor pressure less than 450 psig.
- ### The Loss of Voltage and Degraded Voltage functions are common to Divisions 1, 2 and 3.

PERRY - UNIT 1

3/4 3-30

Amendment No. 50
AUG 1 1 1993

TABLE 3.3.3-1 (Continued)
EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION
ACTION

- ACTION 30 - With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function requirement:
a. With one channel inoperable, place the inoperable channel in the tripped condition within one hour or declare the associated ADS trip system or ECCS inoperable. |
b. With more than one channel inoperable, declare the associated ADS trip system or ECCS inoperable. |
- ACTION 31 - With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function requirement, declare the associated ADS trip system or ECCS inoperable.
- ACTION 32 - With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function requirement, place the inoperable channel in the tripped condition within one hour. |
- ACTION 33 - With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function requirement, restore the inoperable channel to OPERABLE status within 8 hours or declare the associated ADS trip system or ECCS inoperable. |
- ACTION 34 - With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function requirement, place the inoperable channel(s) in the tripped condition within one hour or declare the HPCS system inoperable.
- ACTION 35 - With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function requirement, place at least one inoperable channel in the tripped condition within one hour, or align the HPCS system to take suction from the suppression pool, or declare the HPCS system inoperable.
- ACTION 36 - With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function requirement, place at least one inoperable channel in the tripped condition within one hour or declare the HPCS system inoperable.
- ACTION 37 - With the number of OPERABLE channels less than the Total Number of Channels, declare the associated emergency diesel generator inoperable and take the ACTION required by Specification 3.8.1.1 or 3.8.1.2 as appropriate.
- ACTION 38 - With the number of OPERABLE channels less than the Total Number of Channels, place the inoperable channel in the tripped condition within one hour; operation may then continue until performance of the next required CHANNEL FUNCTIONAL TEST.
- ACTION 39 - With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function requirement, place the inoperable channel in the tripped condition within one hour. Restore the inoperable channel to OPERABLE status within 7 days or declare the associated system inoperable.

TABLE 3.3.3-2

EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION SETPOINTS

<u>TRIP FUNCTION</u>	<u>TRIP SETPOINT</u>	<u>ALLOWABLE VALUE</u>
A. <u>DIVISION 1 TRIP SYSTEM</u>		
1. <u>RHR-A (LPCI MODE) AND LPCS SYSTEM</u>		
a. Reactor Vessel Water Level - Low, Level 1	≥ 16.5 inches*	≥ 14.3 inches
b. Drywell Pressure - High	≤ 1.68 psig	≤ 1.88 psig
c. LPCS Pump Discharge Flow - Low (Bypass)	≥ 1350 gpm	≥ 1200 gpm
d. Reactor Vessel Pressure - Low (LPCS Injection Valve Permissive)	577.7 ± 15 psig	577.7 + 30, -95 psig
e. Reactor Vessel Pressure - Low (LPCI Injection Valve Permissive)	502.5 + 5, -10 psig	502.5 + 10, -40 psig
f. LPCI Pump A Start Time Delay Relay	≤ 5 seconds	≤ 5.25 seconds
g. LPCI Pump A Discharge Flow - Low (Bypass)	≥ 1650 gpm	≥ 1450 gpm
h. Manual Initiation	NA	NA
2. <u>AUTOMATIC DEPRESSURIZATION SYSTEM TRIP SYSTEM "A"</u>		
a. Reactor Vessel Water Level - Low Level 1	≥ 16.5 inches*	≥ 14.3 inches
b. Manual Inhibit	NA	NA
c. ADS Timer	≤ 105 seconds	≤ 117 seconds
d. Reactor Vessel Water Level - Low, Level 3 (Permissive)	≥ 177.7 inches*	≥ 177.1 inches
e. LPCS Pump Discharge Pressure - High (Permissive)	≥ 145 psig, increasing	≥ 125 psig, increasing
f. LPCI Pump A Discharge Pressure - High (Permissive)	≥ 125 psig, increasing	≥ 115 psig, increasing
g. Manual Initiation	NA	NA

PERRY - UNIT 1

3/4 3-32



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 53 TO FACILITY OPERATING LICENSE NO. NPF-58
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY, ET AL.
PERRY NUCLEAR POWER PLANT, UNIT NO. 1
DOCKET NO. 50-440

1.0 INTRODUCTION

By letter dated March 19, 1991, the Cleveland Electric Illuminating Company, et al. (licensees), proposed changes to the Technical Specifications (TSs) for the Perry Nuclear Power Plant, Unit No. 1. The proposed changes would modify TS Table 3.3.3-1, "Emergency Core Cooling System Actuation Instrumentation." Specifically, the proposed amendment would correct inconsistencies between the Action statements associated with the table, and the as-built configuration of the automatic depressurization system (ADS).

Under certain accident conditions, it might be necessary to rapidly depressurize the reactor vessel. To accomplish this depressurization, ADS logic is installed for either automatic or manual actuation. When ADS is actuated, the eight associated main steam safety/relief valves are opened, relieving the reactor vessel pressure. The actuation logic for ADS is designed with two divisions of actuation logic (or trip systems). If either trip system is actuated, all eight ADS valves will open.

2.0 EVALUATION

The licensee has proposed to make several changes to TS Table 3.3.3-1 in order to correct differences between the Action statements associated with the table and the as-built configuration of ADS. The licensee proposed changes to the wording of Action statements 30 and 33 to clarify the actions to be taken for ADS and to make the words in these Action statements consistent with Action statement 31. The licensee also proposed to change the action to be taken for an inoperable ADS inhibit switch from Action statement 33 to Action statement 31.

The proposed revision to Action statement 30 would read:

- ACTION 30 - With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function requirement:
- With one channel inoperable, place the inoperable channel in the tripped condition within one hour or declare the associated ADS trip system or ECCS inoperable.
 - With more than one channel inoperable, declare the associated ADS trip system or ECCS inoperable.

The proposed revision to Action statement 33 would read:

ACTION 33 - With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function requirement, restore the inoperable channel to OPERABLE status within 8 hours or declare the associated ADS trip system or ECCS inoperable.

Action statements 30 and 33 are referred to for action for both the ECCS systems and ADS in TS Table 3.3.3-1, "Emergency Core Cooling System Actuation Instrumentation." For ECCS, if one division of actuation instrumentation (referred to in TS as a trip system) is inoperable, as evidenced by "the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function," the automatic initiation of the associated ECCS will not occur. The Action statement therefore requires the licensee to declare the associated ECCS inoperable. However, the actuation logic for ADS is designed differently than the actuation logic for ECCS. If one trip system for ADS is inoperable, the other trip system is still capable of initiating ADS and opening all of the ADS valves. Therefore, if one trip system for ADS is inoperable it is not appropriate to declare the entire ADS inoperable. Rather, the affected trip system should be declared inoperable. The licensee would then refer to Action c. of Limiting Condition for Operation 3.3.3 for further actions. Because of the differences in the design of the logic for the ADS and ECCS actuation logic, it is appropriate for the Action statements for an inoperable trip system to differ for ADS and ECCS.

The present Action statement 30 would require the licensee to declare the ADS inoperable even though it was capable of performing its design function through the OPERABLE trip system. The TS would then require the licensee to place the plant "in at least HOT SHUTDOWN within the next 12 hours and reduce reactor steam dome pressure to less than or equal to 100 psig within the following 24 hours." Such a shutdown would be unnecessary and could be contrary to plant safety since ADS would still be capable of performing its design function. Therefore the proposed change to Action Statement 30 is acceptable.

With respect to ADS, the present Action statement 33 tells the licensee to declare the associated ADS valve inoperable. Since all eight ADS valves are associated with both trip systems, this Action statement in effect, tells the licensee to declare all of the ADS valves inoperable. This is inappropriate when only one ADS trip system is inoperable as discussed above. Therefore, the proposed change to Action statement 33 is acceptable.

The licensee also proposed to change the action to be taken for an inoperable ADS inhibit switch from Action statement 33 to Action statement 31. An inhibit switch is installed in each trip system to allow the licensee to block the actuation of ADS under certain conditions as described in the emergency procedures. The present TS refers the licensee to Action statement 33 for an inoperable inhibit switch. The Action statement would allow the licensee eight hours to repair an inoperable inhibit switch before taking any further action. This is the same action taken for inoperable manual initiation logic

in one trip system. If the manual initiation logic in one trip system is inoperable, the automatic initiation logic for that trip system is still available. In addition, the licensee can open the ADS valves using each valve's individual control switches. It is appropriate to allow the licensee time to restore the manual initiation logic to an operable status under these circumstances. However, depending on the failure mechanism, an inoperable inhibit switch may prevent the operation of both the manual and automatic initiation logic for the associated ADS trip system. Therefore, it is not appropriate to wait eight hours before declaring that trip system inoperable. The proposed change would require the licensee to declare the associated ADS trip system inoperable as soon as an inoperable inhibit switch for that trip system was identified. This action is conservative and consistent with the action required for other failures that render a trip system inoperable. Therefore, the proposed change in the action required for an inoperable inhibit switch is acceptable.

During the review for this amendment request, an editorial discrepancy was noted in Action statement 32. With the agreement of the licensee during a discussion on November 5, 1993, this amendment is being issued with the words "required by" inserted in Action statement 32 to make it consistent with the wording of Action Statements 30 and 33. This is a minor editorial change that did not change the initial proposed no significant hazards consideration determination.

3.0 STATE CONSULTATION

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

4.0 ENVIRONMENTAL CONSIDERATION

This amendment changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or changes a surveillance requirement. The 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 (56 FR 22480). 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.

5.0 CONCLUSION

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

Principal Contributor: Andrew J. Kugler

Date: December 17, 1993