

March 29, 199

Docket No. 50-482

Mr. Bart D. Withers  
President and Chief Executive Officer  
Wolf Creek Nuclear Operating Corporation  
Post Office Box 411  
Burlington, Kansas 66839

Dear Mr. Withers:

SUBJECT: WOLF CREEK GENERATING STATION - AMENDMENT NO. 43 TO FACILITY  
OPERATING LICENSE NO. NPF-42 (TAC NO. 79867)

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The Commission has issued the enclosed Amendment No. 43 to Facility Operating License No. NPF-42 for the Wolf Creek Generating Station. The amendment consists of changes to the Technical Specifications in response to your application dated March 1, 1991 (ET 91-0047), and as supplemented on March 8, 1991 (ET 91-0053), and March 21, 1991 (NO 91-0100).

The amendment revises Technical Specification Tables 3.3-1, 4.3-1, 3.3-3, and 4.3-2 and associated Bases to increase the surveillance test intervals and allowed outage times for the analog channels of the Reactor Trip System and the Engineered Safety Features Actuation Systems. The technical specification changes are based on WCAP-10271, Supplement 2 and WCAP-10271, Supplement 2, Revision 1, "Evaluation of Surveillance Frequencies and Out of Service Times for the Engineered Safety Features Actuation System." The NRC staff has previously reviewed and approved these documents in safety evaluations dated February 22, 1989, and April 30, 1990. The NRC has encouraged licensees to incorporate the changes approved in these safety evaluations. In addition, changes inadvertently omitted in the processing of Amendment No. 12 to the Wolf Creek Operating License dated November 2, 1987, have also been included.

As requested in your original submittal, this license amendment has been handled on an exigent basis in accordance with 10 CFR 50.91(a)(6). A copy of our related Safety Evaluation is enclosed. The notice of issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,

Original Signed By George F. Dick, Jr.  
for  
Douglas V. Pickett, Project Manager  
Project Directorate IV-2  
Division of Reactor Projects - III/IV/V  
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 43 to NPF-42
2. Safety Evaluation

cc w/enclosures:  
See next page

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CP-1

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DATE	: 3/21/91	: 3/21/91	: 3/21/91	: 3/22/91	: 3/28/91

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

WOLF CREEK NUCLEAR OPERATING CORPORATION

WOLF CREEK GENERATING STATION

DOCKET NO. 50-482

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 43  
License No. NPF-42

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment to the Wolf Creek Generating Station (the facility) Facility Operating License No. NPF-42 filed by the Wolf Creek Nuclear Operating Corporation (the Corporation), dated March 1, 1991 and as supplemented on March 8, 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, as amended, 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 license 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.

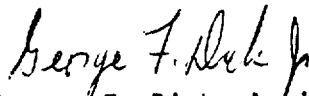
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 2.C.(2) of Facility Operating License No. NPF-42 is hereby amended to read as follows:

2. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 43, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated in the license. The Corporation shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

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

FOR THE NUCLEAR REGULATORY COMMISSION



George F. Dick, Acting Director  
Project Directorate IV-2  
Division of Reactor Projects - III/IV/V  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: March 29, 1991

ATTACHMENT TO LICENSE AMENDMENT NO. 43

FACILITY OPERATING LICENSE NO. NPF-42

DOCKET NO. 50-482

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by amendment number and contain marginal lines indicating the area of change. The corresponding overleaf pages are also provided to maintain document completeness.

<u>REMOVE</u>	<u>INSERT</u>
3/4 3-3	3/4 3-3
3/4 3-4	3/4 3-4
3/4 3-5	3/4 3-5
3/4 3-6	3/4 3-6
----	3/4 3-6a
3/4 3-9	3/4 3-9
3/4 3-10	3/4 3-10
3/4 3-12a	3/4 3-12a
3/4 3-14	3/4 3-14
3/4 3-16	3/4 3-16
3/4 3-17	3/4 3-17
3/4 3-18	3/4 3-18
3/4 3-20	3/4 3-20
3/4 3-21	3/4 3-21
----	3/4 3-21a
3/4 3-22	3/4 3-22
3/4 3-34	3/4 3-34
3/4 3-35	3/4 3-35
3/4 3-36	3/4 3-36
3/4 3-37	3/4 3-37
3/4 3-38	3/4 3-38
B 3/4 3-1	B 3/4 3-1
B 3/4 3-2	B 3/4 3-2
B 3/4 3-3	B 3/4 3-3

TABLE 3.3-1 (Continued)  
REACTOR TRIP SYSTEM INSTRUMENTATION

<u>FUNCTIONAL UNIT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>CHANNELS TO TRIP</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABLE MODES</u>	<u>ACTION</u>
11. Pressurizer Water Level-High	3	2	2	1	6#
12. Reactor Coolant Flow - Low					
a. Single Loop (Above P-8)	3/loop	2/loop in any oper- ating loop	2/loop in each oper- ating loop	1	6#
b. Two Loops (Above P-7 and below P-8)	3/loop	2/loop in two oper- ating loops	2/loop in each oper- ating loop	1	6#
13. Steam Generator Water Level-Low-Low	4/stm. gen.	2/stm. gen. in any oper- ating stm. gen.	3/stm. gen. in each oper- ating stm. gen.	1, 2	6#(1)
14. Undervoltage-Reactor Coolant Pumps	4-2/bus	2-1/bus	3	1	6#
15. Underfrequency-Reactor Coolant Pumps	4-2/bus	2-1/bus	3	1	6#
16. Turbine Trip					
a. Low Fluid Oil Pressure	3	2	2	1	6#
b. Turbine Stop Valve Closure	4	4	1	1	11#
17. Safety Injection Input from ESF	2	1	2	1, 2	7

TABLE 3.3-1 (Continued)

REACTOR TRIP SYSTEM INSTRUMENTATION

<u>FUNCTIONAL UNIT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>CHANNELS TO TRIP</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABLE MODES</u>	<u>ACTION</u>
18. Reactor Trip System Interlocks					
a. Intermediate Range Neutron Flux, P-6	2	1	2	2##	8
b. Low Power Reactor Trips Block, P-7					
P-10 Input	4	2	3	1	8
or					
P-13 Input	2	1	2	1	8
c. Power Range Neutron Flux, P-8	4	2	3	1	8
d. Power Range Neutron Flux, P-9	4	2	3	1	8
e. Power Range Neutron Flux, P-10	4	2	3	1, 2	8
f. Turbine Impulse Chamber Pressure, P-13	2	1	2	1	8
19. Reactor Trip Breakers	2	1	2	1, 2	9, 12
	2	1	2	3*, 4*, 5*	10
20. Automatic Trip and Interlock Logic	2	1	2	1, 2	7
	2	1	2	3*, 4*, 5*	10

TABLE 3.3-1 (Continued)

TABLE NOTATIONS

\*Only if the Reactor Trip System breakers happen to be in the closed position and the Control Rod Drive System is capable of rod withdrawal.

\*\*The boron dilution flux doubling signal may be blocked during reactor startup in accordance with normal operating procedures.

#The provisions of Specification 3.0.4 are not applicable.

##Below the P-6 (Intermediate Range Neutron Flux Interlock) Setpoint.

###Below the P-10 (Low Setpoint Power Range Neutron Flux Interlock) Setpoint.

(1)The applicable MODES for these channels noted in Table 3.3-3 are more restrictive and therefore applicable.

ACTION STATEMENTS

ACTION 1 - 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 HOT STANDBY within the next 6 hours.

ACTION 2 - 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 6 hours;
- b. The Minimum Channels OPERABLE requirement is met; however, the inoperable channel may be bypassed for up to 4 hours for surveillance testing of other channels per Specification 4.3.1.1; and
- c. Either, THERMAL POWER is restricted to less than or equal to 75% of RATED THERMAL POWER and the Power Range Neutron Flux Trip Setpoint is reduced to less than or equal to 85% of RATED THERMAL POWER within 4 hours; or, the QUADRANT POWER TILT RATIO is monitored at least once per 12 hours per Specification 4.2.4.2.

ACTION 3 - With the number of channels OPERABLE one less than the Minimum Channels OPERABLE requirement and with the THERMAL POWER level:

- a. Below the P-6 (Intermediate Range Neutron Flux Interlock) Setpoint, restore the inoperable channel to OPERABLE status prior to increasing THERMAL POWER above the P-6 Setpoint; or
- b. Above the P-6 (Intermediate Range Neutron Flux Interlock) Setpoint but below 10% of RATED THERMAL POWER, restore the inoperable channel to OPERABLE status prior to increasing THERMAL POWER above 10% of RATED THERMAL POWER.

ACTION 4 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement suspend all operations involving positive reactivity changes.



TABLE 3.3-1 (Continued)

ACTION STATEMENTS (Continued)

- ACTION 5 - a. 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 open the Reactor Trip Breakers, suspend all operations involving positive reactivity changes and verify valves BG-V178 and BG-V601 are closed and secured in position within the next hour.
- b. With no channels OPERABLE, open the Reactor Trip Breakers, suspend all operations involving positive reactivity changes and verify compliance with the SHUTDOWN MARGIN requirements of Specification 3.1.1.1 or 3.1.1.2, as applicable, within 1 hour and every 12 hours thereafter, and verify valves BG-V178 and BG-V601 are closed and secured in position within 4 hours and verified to be closed and secured in position every 14 days.
- ACTION 6 - 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 6 hours; and
- b. The Minimum Channels OPERABLE requirement is met; however, the inoperable channel may be bypassed for up to 4 hours for surveillance testing of other channels per Specification 4.3.1.1.
- ACTION 7 - 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; however, one channel may be bypassed for up to 4 hours for surveillance testing per Specification 4.3.1.1, provided the other channel is operable.
- ACTION 8 - With less than the Minimum Number of Channels OPERABLE, within 1 hour determine by observation of the associated permissive annunciator window(s) that the interlock is in its required state for the existing plant condition, or apply Specification 3.0.3.
- ACTION 9 - With the number of OPERABLE Reactor Trip Breakers one less than the Minimum Channels OPERABLE requirement, be in at least HOT STANDBY within 6 hours; however, one breaker may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.1.1, provided the other breaker is OPERABLE.
- ACTION 10 - 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 open the Reactor trip breakers within the next hour.
- ACTION 11 - With the number of OPERABLE channels less than the Total Number of Channels, operation may continue provided the inoperable channels are placed in the tripped condition within 6 hours.

TABLE 3.3-1 (Continued)

ACTION STATEMENTS (Continued)

ACTION 12 - With one of the diverse trip features (undervoltage or shunt trip attachment) inoperable, restore it to OPERABLE status within 48 hours or declare the breaker inoperable and apply ACTION 9. The breaker shall not be bypassed while one of the diverse trip features is inoperable except for the time required for performing maintenance to restore the breaker to OPERABLE status.

TABLE 4.3-1

REACTOR TRIP SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

FUNCTIONAL UNIT	CHANNEL CHECK	CHANNEL CALIBRATION	ANALOG CHANNEL OPERATIONAL TEST	TRIP ACTUATING DEVICE OPERATIONAL TEST	ACTUATION LOGIC TEST	MODES FOR WHICH SURVEILLANCE IS REQUIRED
1. Manual Reactor Trip	N.A.	N.A.	N.A.	R(11)	N.A.	1, 2, 3*, 4*, 5*
2. Power Range, Neutron Flux						
a. High Setpoint	S	D(2, 4) M(3, 4) Q(4, 6) R(4, 5)	Q	N.A.	N.A.	1, 2
b. Low Setpoint	S	R(4)	S/U(1)	N.A.	N.A.	1###, 2
3. Power Range, Neutron Flux, High Positive Rate	N.A.	R(4)	Q	N.A.	N.A.	1, 2
4. Power Range, Neutron Flux, High Negative Rate	N.A.	R(4)	Q	N.A.	N.A.	1, 2
5. Intermediate Range, Neutron Flux	S	R(4, 5)	S/U(1)	N.A.	N.A.	1###, 2
6. Source Range, Neutron Flux	S	R(4, 5, 12)	S/U(1), Q(9)	N.A.	N.A.	2##, 3, 4, 5
7. Overtemperature $\Delta T$	S	R(13)	Q	N.A.	N.A.	1, 2
8. Overpower $\Delta T$	S	R	Q	N.A.	N.A.	1, 2
9. Pressurizer Pressure-Low	S	R	Q	N.A.	N.A.	1
10. Pressurizer Pressure-High	S	R	Q	N.A.	N.A.	1, 2
11. Pressurizer Water Level-High	S	R	Q	N.A.	N.A.	1
12. Reactor Coolant Flow-Low	S	R	Q	N.A.	N.A.	1

TABLE 4.3-1 (Continued)

REACTOR TRIP SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>ANALOG CHANNEL OPERATIONAL TEST</u>	<u>TRIP ACTUATING DEVICE OPERATIONAL TEST</u>	<u>ACTUATION LOGIC TEST</u>	<u>MODES FOR WHICH SURVEILLANCE IS REQUIRED</u>
13. Steam Generator Water Level- Low-Low	S	R	Q(15)	N.A.	N.A.	1, 2
14. Undervoltage - Reactor Coolant Pumps	N.A.	R	N.A.	Q	N.A.	1
15. Underfrequency - Reactor Coolant Pumps	N.A.	R	N.A.	Q	N.A.	1
16. Turbine Trip						
a. Low Fluid Oil Pressure	N.A.	R	N.A.	S/U(1, 10)	N.A.	1
b. Turbine Stop Valve Closure	N.A.	R	N.A.	S/U(1, 10)	N.A.	1
17. Safety Injection Input from ESF	N.A.	N.A.	N.A.	R	N.A.	1, 2
18. Reactor Trip System Interlocks						
a. Intermediate Range Neutron Flux, P-6	N.A.	R(4)	R	N.A.	N.A.	2##
b. Power Range Neutron Flux, P-8	N.A.	R(4)	R	N.A.	N.A.	1
c. Power Range Neutron Flux, P-9	N.A.	R(4)	R	N.A.	N.A.	1

TABLE 4.3-1 (Continued)

TABLE NOTATIONS

- (13) CHANNEL CALIBRATION shall include the RTD bypass loops flow rate.
- (14) DELETED.
- (15) The MODES specified for these channels in Table 4.3-2 are more restrictive and, therefore, applicable.
- (16) The TRIP ACTUATING DEVICE OPERATIONAL TEST shall independently verify the OPERABILITY of the undervoltage and shunt trip attachments of the Reactor Trip Breakers.
- (17) Local manual shunt trip prior to placing breaker in service.
- (18) Automatic undervoltage trip.

## INSTRUMENTATION

### 3/4.3.2 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

#### LIMITING CONDITION FOR OPERATION

3.3.2 The Engineered Safety Features Actuation System (ESFAS) instrumentation channels and interlocks shown in Table 3.3-3 shall be OPERABLE with their 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.

APPLICABILITY: As shown in Table 3.3-3.

#### ACTION:

- a. With an ESFAS Instrumentation or Interlock Trip Setpoint less conservative than the value shown in the Trip Setpoint column but more conservative than the value shown in the Allowable Value column of Table 3.3-4 adjust the Setpoint consistent with the Trip Setpoint value.
- b. With an ESFAS Instrumentation or Interlock Trip Setpoint less conservative than the value shown in the Allowable Values column of Table 3.3-4, either:
  1. Adjust the Setpoint consistent with the Trip Setpoint value of Table 3.3-4 and determine within 12 hours that Equation 2.2-1 was satisfied for the affected channel, or
  2. Declare the channel inoperable and apply the applicable ACTION statement requirements of Table 3.3-3 until the channel is restored to OPERABLE status with its Setpoint adjusted consistent with the Trip Setpoint value.

Equation 2.2-1

$$Z + R + S \leq TA$$

Where:

Z = The value from Column Z of Table 3.3-4 for the affected channel,

R = The "as measured" value (in percent span) of rack error for the affected channel,

S = Either the "as measured" value (in percent span) of the sensor error, or the value from Column S (Sensor Error) of Table 3.3-4 for the affected channel, and

TA = The value from Column TA (Total Allowance) of Table 3.3-4 for the affected channel.

- c. With an ESFAS instrumentation channel or interlock inoperable, take the ACTION shown in Table 3.3-3.

#### SURVEILLANCE REQUIREMENTS

4.3.2.1 Each ESFAS instrumentation channel and interlock and the automatic actuation logic and relays shall be demonstrated OPERABLE by the performance of the ESFAS Instrumentation Surveillance Requirements specified in Table 4.3-2.

4.3.2.2 The ENGINEERED SAFETY FEATURES RESPONSE TIME of each ESFAS function shall be demonstrated to be within the limit at least once per 18 months. Each test shall include at least one train such that both trains are tested at least once per 36 months and one channel per function such that all channels are tested at least once per N times 18 months where N is the total number of redundant channels in a specific ESFAS function as shown in the "Total No. of Channels" Column of Table 3.3-3.

TABLE 3.3-3

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

<u>FUNCTIONAL UNIT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>CHANNELS TO TRIP</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABLE MODES</u>	<u>ACTION</u>
1. Safety Injection, (Reactor Trip, Phase "A" Isolation, Feedwater Isolation, Component Cooling Water, Turbine Trip, Auxiliary Feedwater-Motor-Driven Pump, Emergency Diesel Generator Operation, Containment Cooling, and Essential Service Water Operation)					
a. Manual Initiation	2	1	2	1, 2, 3, 4	18
b. Automatic Actuation Logic and Actuation Relays (SSPS)	2	1	2	1, 2, 3, 4	14
c. Containment Pressure-High-1	3	2	2	1, 2, 3	28*
d. Pressurizer Pressure-Low	4	2	3	1, 2, 3#	28*
e. Steam Line Pressure-Low	3/steam line	2/steam line any steam line	2/steam line	1, 2, 3#	28*
2. Containment Spray					
a. Manual Initiation	2 pair	1 pair operated simul- taneously	2 pair	1, 2, 3, 4	18
b. Automatic Actuation Logic and Actuation Relays (SSPS)	2	1	2	1, 2, 3, 4	14
c. Containment Pressure-High-3	4	2	3	1, 2, 3	16

WOLF CREEK - UNIT 1

3/4 3-14

Amendment No. 43

TABLE 3.3-3 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

<u>FUNCTIONAL UNIT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>CHANNELS TO TRIP</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABLE MODES</u>	<u>ACTION</u>
3. Containment Isolation					
a. Phase "A" Isolation					
1) Manual Initiation	2	1	2	1, 2, 3, 4	18
2) Automatic Actuation Logic and Actuation Relays (SSPS)	2	1	2	1, 2, 3, 4	14
3) Safety Injection	See Item 1. above for all Safety Injection initiating functions and requirements.				
b. Phase "B" Isolation					
1) Manual Initiation	2 pair	1 pair operated simul- taneously	2 pair	1, 2, 3, 4	18
2) Automatic Actuation Logic and Actuation Relays (SSPS)	2	1	2	1, 2, 3, 4	14
3) Containment Pressure-High-3	4	2	3	1, 2, 3	16
c. Containment Purge Isolation					
1) Manual Initiation	2	1	2	1, 2, 3, 4	17
2) Automatic Actuation Logic and Actuation Relays (SSPS)	2	1	2	1, 2, 3, 4	17
3) Automatic Actuation Logic and Actuation Relays (BOP ESFAS)	2	1	2	1, 2, 3, 4	17
4) Phase "A" Isolation	See Item 3.a. for all Phase "A" Isolation initiating functions and requirements.				



TABLE 3.3-3 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

<u>FUNCTIONAL UNIT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>CHANNELS TO TRIP</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABLE MODES</u>	<u>ACTION</u>
4. Steam Line Isolation					
a. Manual Initiation					
1) Individual	1/steam line	1/steam line	1/operating steam line	1, 2, 3	23
2) System	2	1	2	1, 2, 3	22
b. Automatic Actuation Logic and Actuation Relays (SSPS)	2	1	2	1, 2, 3	29
c. Containment Pressure-High-2	3	2	2	1, 2, 3	28*
d. Steam Line Pressure-Low	3/steam line	2/steam line any steam line	2/steam line	1, 2, 3#	28*
e. Steam Line Pressure- Negative Rate-High	3/steam line	2/steam line any steam line	2/steam line	3##	28*
5. Turbine Trip & Feedwater Isolation					
a. Automatic Actuation Logic and Actuation Relay (SSPS)	2	1	2	1, 2	27
b. Steam Generator Water Level-High-High	4/stm. gen.	2/stm. gen. in any oper- ating stm. gen.	3/stm. gen. in each oper- ating stm. gen.	1, 2	28*
c. Safety Injection	See Item 1. above for all Safety Injection initiating functions and requirements.				

TABLE 3.3-3 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

<u>FUNCTIONAL UNIT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>CHANNELS TO TRIP</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABLE MODES</u>	<u>ACTION</u>
6. Auxiliary Feedwater					
a. Manual Initiation	3(1/pump)	1/pump	1/pump	1, 2, 3	24
b. Automatic Actuation Logic and Actuation Relays (SSPS)	2	1	2	1, 2, 3	29
c. Automatic Actuation Logic and Actuation Relays (BOP ESFAS)	2	1	2	1, 2, 3	21
d. Stm. Gen. Water Level- Low-Low					
1) Start Motor-Driven Pumps	4/stm. gen.	2/stm. gen. in any opera- ting stm. gen.	3/stm. gen. in each operating stm. gen.	1, 2, 3	28*
2) Start Turbine-Driven Pump	4/stm. gen.	2/stm. gen. in any 2 operating stm. gen.	3/stm. gen. in each operating stm. gen.	1, 2, 3	28*
e. Safety Injection - Start Motor-Driven Pumps	See Item 1. above for all Safety Injection initiating functions and requirements.				
f. Loss-of-Offsite Power - Start Turbine-Driven Pump	2	1	2	1,2,3	22

TABLE 3.3-3 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

<u>FUNCTIONAL UNIT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>CHANNELS TO TRIP</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABLE MODES</u>	<u>ACTION</u>
6. Auxiliary Feedwater (Continued)					
g. Trip of All Main Feedwater Pumps - Start Motor-Driven Pumps	4-(2/pump)**	2-(1/pump in same separation)	3	1	19***
h. Auxiliary Feedwater Pump Suction Pressure-Low (Transfer to ESW)	3	2	2	1, 2, 3	15*
7. Automatic Switchover to Containment Sump					
a. Automatic Actuation Logic and Actuation Relays (SSPS)	2	1	2	1, 2, 3, 4	14
b. RWST Level - Low-Low Coincident With Safety Injection	4	2	3	1, 2, 3, 4	16
	See Item 1. above for Safety Injection initiating functions and requirements.				
8. Loss of Power					
a. 4 kV Bus Undervoltage -Loss of Voltage	4/Bus	2/Bus	3/Bus	1, 2, 3, 4	19*
b. 4 kV Bus Undervoltage -Grid Degraded Voltage	4/Bus	2/Bus	3/Bus	1, 2, 3, 4	19*

TABLE 3.3-3 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

<u>FUNCTIONAL UNIT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>CHANNELS TO TRIP</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABLE MODES</u>	<u>ACTION</u>
9. Control Room Isolation					
a. Manual Initiation	2	1	2	A11	26
b. Automatic Actuation Logic and Actuation Relays (SSPS)	2	1	2	1, 2, 3, 4	26
c. Automatic Actuation Logic and Actuation Relays (BOP ESFAS)	2	1	2	A11	26
d. Phase "A" Isolation	See Item 3.a. above for all Phase "A" Isolation initiating functions and requirements.				
10. Solid-State Load Sequencer	2-1/train	1/train	2-1/train	1, 2, 3, 4	25
11. Engineered Safety Features Actuation System Interlocks					
a. Pressurizer Pressure, P-11	3	2	2	1, 2, 3	20
b. Reactor Trip, P-4	4-2/Train	2/Train	2/Train	1, 2, 3	22

TABLE 3.3-3 (Continued)

TABLE NOTATIONS

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

##Trip function automatically blocked above P-11 and may be blocked below P-11 when Safety Injection on low steam line pressure is not blocked.

\*The provisions of Specification 3.0.4 are not applicable.

\*\*One in Separation Group 1 and one in Separation Group 4.

\*\*\*The de-energization of one train of BOP ESFAS actuation logic and actuation relays renders two of the four channels inoperable. Action Statement 21 applies to both Functional Units 6.c and 6.g in this case.

ACTION STATEMENTS

ACTION 14 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, be in at least HOT STANDBY within 12 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 - With the number of OPERABLE channels one less than the Total Number of Channels, operation may proceed until performance of the next required ANALOG CHANNEL OPERATIONAL TEST provided the inoperable channel is placed in the tripped condition within 1 hour.

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, and

TABLE 3.3-3 (Continued)

ACTION STATEMENTS (Continued)

- b. The Minimum Channels OPERABLE requirement 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.

- ACTION 20 - With less than the Minimum Channels OPERABLE, within 1 hour determine by observation of the associated permissive annunciator window(s) that the interlock is in its required state for the existing plant condition, or apply Specification 3.0.3.
- ACTION 21 - With the number of OPERABLE Channels one less than the Minimum Channels OPERABLE requirement, 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 2 hours for surveillance testing per Specification 4.3.2.1 provided the other channel is OPERABLE.
- ACTION 22 - 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 6 hours and in at least HOT SHUTDOWN within the following 6 hours.
- ACTION 23 - 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 declare the associated valve inoperable and take the action required by Specification 3.7.1.5.
- ACTION 24 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, declare the affected auxiliary feedwater pump inoperable and take the ACTION required by Specification 3.7.1.2.
- ACTION 25 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, declare the affected diesel generator and off-site power source inoperable and take the ACTION required by Specification 3.8.1.1.
- ACTION 26 - 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 initiate and maintain operation of the Control Room Emergency Ventilation System. During operation in MODE 5 and 6, the provisions of Specification 3.0.4 are not applicable.

TABLE 3.3-3 (Continued)

ACTION STATEMENTS (Continued)

- ACTION 27 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, be in at least HOT STANDBY within 12 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 28 - 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 6 hours.
  - b. The minimum channels OPERABLE requirement is met; however, the inoperable channel may be bypassed for up to 4 hours for surveillance testing of other channels per Specification 4.3.2.1.
- ACTION 29 - 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 at least HOT SHUTDOWN within the following 6 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.

TABLE 3.3-4

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION TRIP SETPOINTS

<u>FUNCTIONAL UNIT</u>	<u>TOTAL ALLOWANCE (TA)</u>	<u>Z</u>	<u>SENSOR ERROR (S)</u>	<u>TRIP SETPOINT</u>	<u>ALLOWABLE VALUE</u>
1. Safety Injection (Reactor Trip, Phase "A" Isolation, Feedwater Isolation, Component Cooling Water, Turbine Trip, Auxiliary Feedwater-Motor-Driven Pump, Emergency Diesel Generator Operation, Containment Cooling, and Essential Service Water Operation)					
a. Manual Initiation	N.A.	N.A.	N.A.	N.A.	N.A.
b. Automatic Actuation Logic and Actuation Relays (SSPS)	N.A.	N.A.	N.A.	N.A.	N.A.
c. Containment Pressure High-1	3.6	0.71	1.98	≤ 3.5 psig	≤ 4.5 psig
d. Pressurizer Pressure - Low	16.2	10.71	2.49	≥ 1830 psig	≥ 1815 psig
e. Steam Line Pressure - Low	19.6	14.81	1.93	≥ 615 psig	≥ 571 psig*



TABLE 4.3-2

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION  
SURVEILLANCE REQUIREMENTS

<u>FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>ANALOG CHANNEL OPERATIONAL TEST</u>	<u>TRIP ACTUATING DEVICE OPERATIONAL TEST</u>	<u>ACTUATION LOGIC TEST</u>	<u>MASTER RELAY TEST</u>	<u>SLAVE RELAY TEST</u>	<u>MODES FOR WHICH SURVEILLANCE IS REQUIRED</u>
1. Safety Injection (Reactor Trip, Phase "A" Isolation, Feedwater Isolation, Turbine Trip, Component Cooling Water, Auxiliary Feedwater-Motor-Driven Pump, Emergency Diesel Generator Operation, Containment Cooling, and Essential Service Water Operation)								
a. Manual Initiation	N.A.	N.A.	N.A.	R	N.A.	N.A.	N.A.	1, 2, 3, 4
b. Automatic Actuation Logic and Actuation Relays (SSPS)	N.A.	N.A.	N.A.	N.A.	M(1)	M(1)	Q(3)	1, 2, 3, 4
c. Containment Pressure-High-1	S	R	Q	N.A.	N.A.	N.A.	N.A.	1, 2, 3
d. Pressurizer Pressure-Low	S	R	Q	N.A.	N.A.	N.A.	N.A.	1, 2, 3
e. Steam Line Pressure-Low	S	R	Q	N.A.	N.A.	N.A.	N.A.	1, 2, 3
2. Containment Spray								
a. Manual Initiation	N.A.	N.A.	N.A.	R	N.A.	N.A.	N.A.	1, 2, 3, 4
b. Automatic Actuation Logic and Actuation Relays (SSPS)	N.A.	N.A.	N.A.	N.A.	M(1)	M(1)	Q(3)	1, 2, 3, 4
c. Containment Pressure-High-3	S	R	Q	N.A.	N.A.	N.A.	N.A.	1, 2, 3

TABLE 4.3-2 (Continued)

## ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

FUNCTIONAL UNIT	CHANNEL CHECK	CHANNEL CALIBRATION	ANALOG CHANNEL OPERATIONAL TEST	TRIP ACTUATING DEVICE OPERATIONAL TEST	ACTUATION LOGIC TEST	MASTER RELAY TEST	SLAVE RELAY TEST	MODES FOR WHICH SURVEILLANCE IS REQUIRED
3. Containment Isolation								
a. Phase "A" Isolation								
1) Manual Initiation	N.A.	N.A.	N.A.	R	N.A.	N.A.	N.A.	1, 2, 3, 4
2) Automatic Actuation Logic and Actuation Relays (SSPS)	N.A.	N.A.	N.A.	N.A.	M(1)	M(1)	Q(3)	1, 2, 3, 4
3) Safety Injection	See Item 1. above for all Safety Injection Surveillance Requirements.							
b. Phase "B" Isolation								
1) Manual Initiation	N.A.	N.A.	N.A.	R	N.A.	N.A.	N.A.	1, 2, 3, 4
2) Automatic Actuation Logic and Actuation Relays (SSPS)	N.A.	N.A.	N.A.	N.A.	M(1)	M(1)	Q	1, 2, 3, 4
3) Containment Pressure-High-3	S	R	Q	N.A.	N.A.	N.A.	N.A.	1, 2, 3
c. Containment Purge Isolation								
1) Manual Initiation	N.A.	N.A.	N.A.	R	N.A.	N.A.	N.A.	1, 2, 3, 4
2) Automatic Actuation Logic and Actuation Relays (SSPS)	N.A.	N.A.	N.A.	N.A.	M(1)	M(1)	Q(3)	1, 2, 3, 4
3) Automatic Actuation Logic and Actuation Relays (BOP ESFAS)	N.A.	N.A.	N.A.	N.A.	M(1)(2)	N.A.	N.A.	1, 2, 3, 4
4) Phase "A" Isolation	See Item 3.a. above for all Phase "A" Isolation Surveillance Requirements.							

TABLE 4.3-2 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION  
SURVEILLANCE REQUIREMENTS

<u>FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>ANALOG CHANNEL OPERATIONAL TEST</u>	<u>TRIP ACTUATING DEVICE OPERATIONAL TEST</u>	<u>ACTUATION LOGIC TEST</u>	<u>MASTER RELAY TEST</u>	<u>SLAVE RELAY TEST</u>	<u>MODES FOR WHICH SURVEILLANCE IS REQUIRED</u>
4. Steam Line Isolation								
a. Manual Initiation	N.A.	N.A.	N.A.	R	N.A.	N.A.	N.A.	1, 2, 3
b. Automatic Actuation Logic and Actuation Relays (SSPS)	N.A.	N.A.	N.A.	N.A.	M(1)	M(1)	Q	1, 2, 3
c. Containment Pressure-High-2	S	R	Q	N.A.	N.A.	N.A.	N.A.	1, 2, 3
d. Steam Line Pressure-Low	S	R	Q	N.A.	N.A.	N.A.	N.A.	1, 2, 3
e. Steam Line Pressure-Negative Rate-High	S	R	Q	N.A.	N.A.	N.A.	N.A.	3
5. Turbine Trip and Feedwater Isolation								
a. Automatic Actuation Logic and Actuation Relay (SSPS)	N.A.	N.A.	N.A.	N.A.	M(1)	M(1)	Q(3)	1, 2
b. Steam Generator Water Level-High-High	S	R	Q	N.A.	N.A.	N.A.	N.A.	1, 2
c. Safety Injection	See Item 1. above for all Safety Injection Surveillance Requirements.							
6. Auxiliary Feedwater								
a. Manual Initiation	N.A.	N.A.	N.A.	R	N.A.	N.A.	N.A.	1, 2, 3
b. Automatic Actuation Logic and Actuation Relays (SSPS)	N.A.	N.A.	N.A.	N.A.	M(1)	M(1)	Q	1, 2, 3

TABLE 4.3-2 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION  
SURVEILLANCE REQUIREMENTS

<u>FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>ANALOG CHANNEL OPERATIONAL TEST</u>	<u>TRIP ACTUATING DEVICE OPERATIONAL TEST</u>	<u>ACTUATION LOGIC TEST</u>	<u>MASTER RELAY TEST</u>	<u>SLAVE RELAY TEST</u>	<u>MODES FOR WHICH SURVEILLANCE IS REQUIRED</u>
6. Auxiliary Feedwater (Continued)								
c. Automatic Actuation Logic and Actuation Relays (BOP ESFAS)	N.A.	N.A.	N.A.	N.A.	M(1)(2)	N.A.	N.A.	1, 2, 3(
d. Steam Generator Water Level-Low-Low	S	R	Q	N.A.	N.A.	N.A.	N.A.	1, 2, 3
e. Safety Injection	See Item 1 above for all Safety Injection Surveillance Requirements							
f. Loss-Offsite Power	N.A.	R	N.A.	M	N.A.	N.A.	N.A.	1, 2, 3
g. Trip of All Main Feedwater Pumps	N.A.	N.A.	N.A.	R	N.A.	N.A.	N.A.	1
h. Auxiliary Feedwater Pump Suction Pressure-Low	S	R	M	N.A.	N.A.	N.A.	N.A.	1, 2, 3
7. Automatic Switchover to Containment Sump								
a. Automatic Actuation Logic and Actuation Relays (SSPS)	N.A.	N.A.	N.A.	N.A.	M(1)	M(1)	Q(3)	1, 2, 3, 4
b. RWST Level - Low-Low Coincident With Safety Injection	S	R	Q	N.A.	N.A.	N.A.	N.A.	1, 2, 3, 4
	See Item 1. above for all Safety Injection Surveillance Requirements.							
8. Loss of Power								
a. 4 kV Undervoltage - Loss of Voltage	N.A.	R	N.A.	M	N.A.	N.A.	N.A.	1, 2, 3, 4
b. 4 kV Undervoltage - Grid Degraded Voltage	N.A.	R	N.A.	M	N.A.	N.A.	N.A.	1, 2, 3, 4

TABLE 4.3-2 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION  
SURVEILLANCE REQUIREMENTS

<u>FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>ANALOG CHANNEL OPERATIONAL TEST</u>	<u>TRIP ACTUATING DEVICE OPERATIONAL TEST</u>	<u>ACTUATION LOGIC TEST</u>	<u>MASTER RELAY TEST</u>	<u>SLAVE RELAY TEST</u>	<u>MODES FOR WHICH SURVEILLANCE IS REQUIRED</u>
9. Control Room Isolation								
a. Manual Initiation	N.A.	N.A.	N.A.	R	N.A.	N.A.	N.A.	All
b. Automatic Actuation Logic and Actuation Relays (SSPS)	N.A.	N.A.	N.A.	N.A.	M(1)	M(1)	Q(3)	1, 2, 3
c. Automatic Actuation Logic and Actuation Relays (BOP ESFAS)	N.A.	N.A.	N.A.	N.A.	M(1)(2)	N.A.	N.A.	All
d. Phase "A" Isolation	See Item 3.a. above for all Phase "A" Isolation Surveillance Requirements.							
10. Solid-State Load Sequencer	N.A.	N.A.	N.A.	N.A.	M(1)(2)	N.A.	N.A.	1, 2, 3, 4
11. Engineered Safety Features Actuation System Interlocks								
a. Pressurizer Pressure, P-11	N.A.	R	Q	N.A.	N.A.	N.A.	N.A.	1, 2, 3
b. Reactor Trip, P-4	N.A.	N.A.	N.A.	R	N.A.	N.A.	N.A.	1, 2, 3

TABLE NOTATIONS

- (1) Each train shall be tested at least every 62 days on a STAGGERED TEST BASIS.
- (2) Continuity check may be excluded from the ACTUATION LOGIC TEST.
- (3) Except Relays K602, K620, K622, K624, K630, K740, and K741, which shall be tested at least once per 18 months during refueling and during each COLD SHUTDOWN exceeding 24 hours unless they have been tested within the previous 90 days.

### 3/4.3 INSTRUMENTATION

#### BASES

#### 3/4.3.1 and 3/4.3.2 REACTOR TRIP SYSTEM AND ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

The OPERABILITY of the Reactor Trip System and the Engineered Safety Features Actuation System instrumentation and interlocks ensure that: (1) the associated ACTION and/or Reactor trip will be initiated when the parameter monitored by each channel or combination thereof reaches its Setpoint, (2) the specified coincidence logic is maintained, (3) sufficient redundancy is maintained to permit a channel to be out-of-service for testing or maintenance, and (4) sufficient system functional capability is available from diverse parameters.

The OPERABILITY of these systems is required to provide the overall reliability, redundancy, and diversity assumed available in the facility design for the protection and mitigation of accident and transient conditions. The integrated operation of each of these systems is consistent with the assumptions used in the safety analyses. The Surveillance Requirements specified for these systems ensure that the overall system functional capability is maintained comparable to the original design standards. The periodic surveillance tests performed at the minimum frequencies are sufficient to demonstrate this capability.

The Engineered Safety Features Actuation System Instrumentation Trip Setpoints specified in Table 3.3-4 are the nominal values at which the bistables are set for each functional unit. A Setpoint is considered to be adjusted consistent with the nominal value when the "as measured" Setpoint is within the band allowed for calibration accuracy. Specified surveillance intervals and surveillance and maintenance outage times have been determined in accordance with WCAP-10271, and Supplement 1, "Evaluation of Surveillance Frequencies and Out of Service times for the Reactor Protection Instrumentation System," supplements to that report, and the NRC's Safety Evaluation dated February 21, 1985, WCAP-10271 Supplement 2 and WCAP-10271-P-A Supplement 2, Revision 1, "Evaluation of Surveillance Frequencies and Out of Service Times for the Engineered Safety Features Actuation System," the NRC's Safety Evaluation dated February 22, 1989, and the NRC's Supplemental Safety Evaluation dated April 30, 1990. Surveillance intervals and out of service times were determined based on maintaining and an appropriate level of reliability of the Reactor Protection System and Engineered Safety Features instrumentation.

ESF response times specified in Table 3.3-5 which include sequential operation of the RWST and VCT valves (Notes 3 and 4) are based on values assumed in the non-LOCA safety analyses. These analyses take credit for injection of borated water from the RWST. Injection of borated water is assumed not to occur until the VCT charging pump suction valves are closed following opening of the RWST charging pump suction valves. When the sequential operation of the RWST and VCT valves is not included in the response times (Note 7), the values specified are based on the LOCA analyses. The LOCA analyses take credit for injection flow regardless of the source. Verification of the response times specified in Table 3.3-5 will assure that the assumptions used for the LOCA and non-LOCA analyses with respect to operation of the VCT and RWST valves are valid.

## INSTRUMENTATION

### BASES

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#### REACTOR TRIP SYSTEM AND ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION (Continued)

To accommodate the instrument drift assumed to occur between operational tests and the accuracy to which Setpoints can be measured and calibrated, Allowable Values for the Setpoints have been specified in Table 3.3-4. Operation with Setpoints less conservative than the Trip Setpoint but within the Allowable Value is acceptable since an allowance has been made in the safety analysis to accommodate this error. An optional provision has been included for determining the OPERABILITY of a channel when its Trip Setpoint is found to exceed the Allowable Value. The methodology of this option utilizes the "as measured" deviation from the specified calibration point for rack and sensor components in conjunction with a statistical combination of the other uncertainties of the instrumentation to measure the process variable and the uncertainties in calibrating the instrumentation. In Equation 3.3-1,  $Z + R + S \leq TA$ , the interactive effects of the errors in the rack and the sensor, and the "as measured" values of the errors are considered. Z, as specified in Table 3.3-4, in percent span, is the statistical summation of errors assumed in the analysis excluding those associated with the sensor and rack drift and the accuracy of their measurement. TA or Total Allowance is the difference, in percent span, between the Trip Setpoint and the value used in the analysis for the actuation. R or Rack Error is the "as measured" deviation, in percent span, for the affected channel from the specified Trip Setpoint. S or Sensor Error is either the "as measured" deviation of the sensor from its calibration point or the value specified in Table 3.3-4, in percent span, from the analysis assumptions.

The methodology to derive the Trip Setpoints is based upon combining all of the uncertainties in the channels. Inherent to the determination of the Trip Setpoints are the magnitudes of these channel uncertainties. Sensor and rack instrumentation utilized in these channels are expected to be capable of operating within the allowances of these uncertainty magnitudes. Rack drift in excess of the Allowable Value exhibits the behavior that the rack has not met its allowance. Being that there is a small statistical chance that this will happen, an infrequent excessive drift is expected. Rack or sensor drift, in excess of the allowance that is more than occasional, may be indicative of more serious problems and should warrant further investigation.

The measurement of response time at the specified frequencies provides assurance that the Reactor trip and the Engineered Safety Features actuation associated with each channel is completed within the time limit assumed in the safety analyses. No credit was taken in the analyses for those channels with response times indicated as not applicable. Response time may be demonstrated by any series of sequential, overlapping or total channel test measurements provided that such tests demonstrate the total channel response time as defined. Sensor response time verification may be demonstrated by either: (1) in place, onsite, or offsite test measurements, or (2) utilizing replacement sensors with certified response times.

The Engineered Safety Features Actuation System senses selected plant parameters and determines whether or not predetermined limits are being exceeded.

## INSTRUMENTATION

### BASES

#### REACTOR TRIP SYSTEM AND ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION (Continued)

If they are, the signals are combined into logic matrices sensitive to combinations indicative of various accidents, events, and transients. Once the required logic combination is completed, the system sends actuation signals to those Engineered Safety Features components whose aggregate function best serves the requirements of the condition. As an example, the following actions may be initiated by the Engineered Safety Features Actuation System to mitigate the consequences of a steam line break or loss-of-coolant accident: (1) Safety Injection pumps start and automatic valves position, (2) Reactor trip, (3) Feedwater System isolates, (4) the emergency diesel generators start, (5) containment spray pumps start and automatic valves position, (6) containment isolates, (7) steam line isolation, (8) Turbine trip, (9) auxiliary feedwater pumps start and automatic valves position, (10) containment cooling fans start and automatic valves position, (11) essential service water pumps start and automatic valves position, and (12) isolate normal control room ventilation and start Emergency Ventilation System.

#### Engineered Safety Features Actuation System Interlocks

The Engineered Safety Features Actuation System interlocks perform the following functions:

- P-4      Reactor tripped - Actuates Turbine trip, closes main feedwater valves on  $T_{avg}$  below Setpoint, prevents the opening of the main feedwater valves which were closed by a Safety Injection or High Steam Generator Water Level signal, allows Safety Injection block so that components can be reset or tripped.
- Reactor not tripped - prevents manual block of Safety Injection.
- P-11      On increasing pressure P-11 automatically reinstates safety injection actuation on low pressurizer pressure and low steamline pressure and automatically blocks steamline isolation on negative steamline pressure rate. On decreasing pressure; P-11 allows the manual block of Safety Injection on low pressurizer pressure and low steamline pressure and allows steamline isolation on negative steamline pressure rate to become active upon manual block of low steamline pressure SI.



## INSTRUMENTATION

### BASES

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#### 3/4 3.3 MONITORING INSTRUMENTATION

##### 3/4 3.3.1 RADIATION MONITORING FOR PLANT OPERATIONS

The OPERABILITY of the radiation monitoring instrumentation for plant operations ensures that: (1) the associated ACTION will be initiated when the radiation level monitored by each channel or combination thereof reaches its Setpoint, (2) the specified coincidence logic is maintained, and (3) sufficient redundancy is maintained to permit a channel to be out-of-service for testing or maintenance. The radiation monitors for plant operations senses radiation levels in selected plant systems and locations and determines whether or not predetermined limits are being exceeded. If they are, the signals are combined into logic matrices sensitive to combinations indicative of various accidents and abnormal conditions. Once the required logic combination is completed, the system sends actuation signals to initiate alarms or automatic isolation action and actuation of Emergency Exhaust or Control Room Emergency Ventilation Systems.

##### 3/4.3.3.2 MOVABLE INCORE DETECTORS

The OPERABILITY of the movable incore detectors with the specified minimum complement of equipment ensures that the measurements obtained from use of this system accurately represent the spatial neutron flux distribution of the core. The OPERABILITY of this system is demonstrated by irradiating each detector used and determining the acceptability of its voltage curve.

For the purpose of measuring  $F_Q(Z)$  or  $F_{\Delta H}^N$  a full incore flux map is used. Quarter-core flux maps, as defined in WCAP-8648, June 1976, may be used in recalibration of the Excore Neutron Flux Detection System, and full incore flux maps or symmetric incore thimbles may be used for monitoring the QUADRANT POWER TILT RATIO when one Power Range Neutron Flux channel is inoperable.

##### 3/4.3.3.3 SEISMIC INSTRUMENTATION

The OPERABILITY of the seismic instrumentation ensures that sufficient capability is available to promptly determine the magnitude of a seismic event and evaluate the response of those features important to safety. This capability is required to permit comparison of the measured response to that used in the design basis for the facility to determine if plant shutdown is required pursuant to Appendix A of 10 CFR Part 100. The instrumentation is consistent with the recommendations of Regulatory Guide 1.12, "Instrumentation for Earthquakes," April 1974.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 43 TO FACILITY OPERATING LICENSE NO. NPF-42  
WOLF CREEK NUCLEAR OPERATING CORPORATION  
WOLF CREEK GENERATING STATION  
DOCKET NO. 50-482

1.0 INTRODUCTION

By letter dated March 1, and supplemented by letters dated March 8, 1991, and March 21, 1991, Wolf Creek Nuclear Operating Corporation (WCNOC) (the licensee) requested changes to the Technical Specifications (Appendix A to Facility Operating License No. NPF-42) for the Wolf Creek Generating Station (WCGS). The proposed changes would be in accordance with the staff's safety evaluation (SE) and supplemental safety evaluation (SSE) described below to modify the engineered safety features actuation systems (ESFAS) and reactor trip system (RTS) instrumentation surveillance and testing.

2.0 BACKGROUND

In response to growing concerns over the impact of current testing and maintenance requirements on plant operation, particularly as related to instrumentation systems, the Westinghouse Owners Group (WOG) initiated a program to develop a justification to be used to revise generic and plant-specific instrumentation technical specifications. Operating plants have experienced inadvertent reactor trips and safeguards actuations during performance of instrumentation surveillances, causing unnecessary transients and challenges of safety systems. Significant time and effort on the part of operating staffs have been devoted to performing, reviewing, documenting, and tracking the various surveillance activities.

In response to this concern, the WOG submitted WCAP-10271, "Evaluation of Surveillance Frequencies and Out of Service Times for the Reactor Protection Instrumentation System," to the NRC on February 3, 1983. This resulted in the NRC publishing a SE, in February 1985, that allowed for an increase in surveillance test intervals (STI) from monthly to quarterly, an increase in the time allowed for an inoperable channel to be placed in the tripped condition from 1 to 6 hours, and increased time for surveillance and maintenance testing in bypass for analog channels of the RTS. The SE also required quarterly testing to be conducted on a staggered basis. Subsequently, the WCNOC submitted technical specification changes in accordance with the above. These were approved in License Amendment No. 12 issued on November 2, 1987.

On March 20, 1986, the WOG submitted WCAP-10271, Supplement 2, "Evaluation of Surveillance Frequencies and Out of Service Times for the Engineered Safety Systems Actuation Systems." In addition, on May 12, 1987, the WOG submitted WCAP-10271, Supplement 2, Revision 1. After reviewing these WCAPs, the NRC issued an SE on February 22, 1989 (letter from C.E. Rossi to R.A. Newton). This SE approved quarterly STIs, an increase in the time allowed for an inoperable channel to be placed in the tripped condition from 1 to 6 hours, increased time for surveillance and maintenance testing, and testing in bypass for analog channels of the ESFAS. Staggered testing was not required for ESFAS analog channels and the requirement was removed from the RTS analog channels. The SE also concluded that 4-hour test and 12-hour maintenance allowed outage times (AOTs) are acceptable for ESFAS automatic actuation logic and actuation relays.

On April 30, 1990, the NRC also issued a SSE on WCAP-10271, Supplement 2, Revision 1 (letter from C.E. Rossi to G.T. Goering). This SSE approved AOT and STI extensions for the non-Standard Technical Specifications ESFAS functions along with 4-hour test and 12-hour maintenance AOTs for the RTS actuation logic.

The reduction in testing associated with these changes is expected to result in fewer inadvertent reactor trips and less frequent spurious actuations of ESFAS components. As stated in the staff's SE and SSE described above, the increase of AOTs and STIs for the ESFAS analog channels and AOTs for the actuation logic and relays will result in a slight increase in the probability of core damage accidents. The staff concluded that an overall upper bound for the core damage frequency (CDF) increase due to the proposed STI/AOT changes is less than 6 percent for Westinghouse PWR plants. The staff also concluded that actual CDF increases for individual plants are expected to be substantially less than 6 percent.

The staff considered this CDF increase to be small compared to the range of uncertainty in the CDF analyses and therefore acceptable. Based on the WOG analyses and subsequent staff review, the staff concluded that the proposed STI and AOT changes for the ESFAS and RTS would have only a small, and therefore acceptable, impact on plant risk.

In both the February 22, 1989, SE and April 30, 1990, SSE, the NRC encouraged licensees to propose changes to their technical specifications that are consistent with the guidance provided by the staff. An acceptable format for proposing technical specification changes based on the WCAPs was provided to the WOG in the February 22, 1989, SE. In order for the staff to find the licensee's submittals acceptable, the licensees were told that they must:

1. Confirm the applicability of the generic analyses of WCAP-10271 Supplement 2 and WCAP-10271 Supplement 2, Revision 1, and
2. Confirm that any increase in instrument drift due to the extended STIs is properly accounted for in the setpoint calculation methodology. (Licensees were advised to use the letter from C. E. Rossi to R. F. Janeczek, dated April 27, 1988, for guidance on this issue.)

### 3.0 EXIGENT CIRCUMSTANCES

The Commission's regulations, 10 CFR 50.91, contain provisions for issuance of amendments when the usual 30-day public notice period cannot be met. One type of special exception is an exigency. An exigency is a case where the staff and licensee need to act promptly, but failure to act promptly does not involve a plant shutdown, derating, or delay in startup. The exigency case usually represents an amendment involving a safety enhancement to the plant.

Under such circumstances, the Commission notifies the public in one of two ways: by issuing a Federal Register notice providing the opportunity for hearing and allowing at least two weeks for prior public comments, or by issuing a press release discussing the proposed changes, using the local media. In this case, the Commission used the first approach.

The licensee submitted the request for amendment on March 1, 1991, as supplemented by letter dated March 8, 1991. It was noticed in the Federal Register on March 13, 1991 (56 FR 10584), at which time the staff proposed a no significant hazards consideration determination.

Part of the Wolf Creek ESFAS instrumentation is the Containment Pressure-High 1 signal that can initiate Safety Injection (SI). There are a total of three channels monitoring containment pressure and a two-out-of-three logic is necessary to initiate an SI signal. Current surveillance requirements call for monthly analog channel operational tests (ACOTs). In order to perform these tests, each channel is individually placed in the "test" or trip position thus providing half of the necessary logic to initiate an SI and trip the plant. After a channel is tested, it is taken out of the "test" position and the remaining channels are tested.

During December of 1990, the licensee began to observe spurious spiking on one of the three channels monitoring containment pressure. If a spurious spike occurred while one of the remaining channels was in the tripped condition for the monthly ACOT, an SI would be generated which would trip the plant and subject the facility to an unnecessary transient.

When the licensee identified spurious spiking of the containment pressure channel, immediate troubleshooting and repair efforts were initiated. Initial efforts included the installation of instrumentation to monitor the channel followed by the replacement of the component's power supply. However, the spiking continued and on January 23, 1991, the licensee requested, and was subsequently granted, a temporary waiver of compliance to remove the spiking channel from service while performing the monthly ACOTs on the remaining channels. The licensee then determined that the next repair effort required the replacement of a custom built circuit card for the pressure transmitter. Due to the necessary lead time in obtaining such a card, on February 22, 1991, the licensee requested, and was again granted, the same temporary waiver of compliance for conducting the monthly ACOTs. By changing the test frequency from monthly to quarterly, and revising the Action Statements to provide additional flexibility, technical specification changes in this amendment are intended to preclude the need for additional requests for temporary waivers of

compliance relative to this issue. Considering that the next scheduled ACOT does not allow sufficient time for normal staff review and notifications, the staff is issuing this amendment under an exigent basis as permitted in 10 CFR 50.91(a)(6).

#### 4.0 EVALUATION

As described above, in order to be considered for the generic technical specification changes, licensees must first make two specific findings, the first being that the licensee must confirm the applicability of the generic analyses of WCAP-10271 Supplement 2 and WCAP-10271 Supplement 2, Revision 1 to its facility. In the WCNO letter of March 1, 1991, the licensee stated that the methodology of WCAP-10271 and its supplements were applied to specific RTS and ESFAS functions implemented via the Westinghouse Solid State Protection System (SSPS). A review was performed to assure that the functions used in the generic analysis and the employment of the SSPS to perform ESFAS functions, as described in the generic analysis, are applicable to the WCGS design. Based on their review, the licensee concluded that the WCAP was applicable to the WCGS design.

The second finding that needed to be addressed was the concern over instrument drift over the extended STIs. In their submittals, the licensee stated that instrument drift data from previous analog channel operational tests had been examined and concluded that a review of the data confirmed that the setpoint drift which could be expected under the extended STIs remains within the existing allowance in the instrument setpoint calculation. In addition, the licensee committed to review "as found" and "as left" data for those channels with increased STIs for a one year period to verify that setpoint drift remains within the existing allowance in the instrument setpoint calculation.

Specific changes proposed to be made to the WCGS technical specifications include the following:

1. Table 3.3-1, Functional Unit 13

The licensee proposed to add Action Statement 6# to Functional Unit 13 (Steam Generator Water Level-Low-Low) to Table 3.3-1. This change was approved generically in the staff's SE of February 1985. The licensee previously requested this change, but the staff inadvertently omitted it in implementing License Amendment No. 12.

2. Table 3.3-1, Functional Units 17 and 20

The licensee proposed to add new Action Statement 7 to Functional Unit 17 (Safety Injection Input from ESF) and Functional Unit 20 (Automatic Trip and Interlock Logic) to Table 3.3-1. This increases the surveillance testing AOT from 2 to 4 hours and the maintenance AOT from 6 to 12 hours. The staff found these changes acceptable in the SSE of April 30, 1990.

3. Tables 3.3-1 and 4.3-1, Notes 1 and 15

The licensee proposed to modify Note 1 of Table 3.3-1 and Note 15 of Table 4.3-1. These changes reflect the staff's finding that the AOT and STI for both the RTS and ESFAS analog channels are now the same. Therefore, the changes are acceptable.

4. Table 3.3-1, Action Statement 11

The licensee proposed changing Action Statement 11 of Table 3.3-1 to increase the time to place an inoperable channel in the tripped position from 1 to 6 hours. This change was generically approved in the staff's SE of February 1985, and is, therefore, acceptable.

5. Table 4.3-1, Note 14

The licensee proposed to eliminate Note 14 to Table 4.3-1. This note required staggered testing of the RTS analog channels. Since the staff's SE deleted the requirement to perform staggered testing, this change is acceptable.

6. Table 3.3-3, Action Statements 16 and 28

The licensee proposed to add new Action Statement 28 to a number of functional units of Table 3.3-3. This action increases the time to place an inoperable channel in the tripped position from 1 to 6 hours and it also increases the time that an inoperable channel may be bypassed to allow surveillance testing of other channels from 2 to 4 hours. This change, which was found acceptable in the staff's SE, is applicable to Functional Units 1.c (Containment Pressure - High 1), 1.d (Pressurizer Pressure Low), 1.e (Steam Line Pressure - Low), 4.c (Containment Pressure - High 2), 4.d (Steam Line Pressure - Low), 4.e (Steam Line Pressure - Negative Rate - High), 5.b (Steam Generator Water Level - High-High), and 6.d.1 and 6.d.2 (Steam Generator Water Level - Low-Low Start Auxiliary Feedwater Pumps).

The licensee also proposed to change Action Statement 16 to Table 3.3-3 to increase the AOT for surveillance testing from 2 to 4 hours. This change, which was found acceptable in the staff's SE, is applicable to Functional Units 2.c (Containment Pressure - High 3 - Containment Spray), 3.b.3 (Containment Pressure - High 3 - Containment Isolation), and 7.b (Refueling Water Storage Tank Level-Low-Low Coincident with Safety Injection).

7. Table 3.3-3, Functional Units 1.b, 2.b, 3.a.2, 3.b.2, and 5.a

The licensee proposed to modify Action Statements 14 and 27 of Table 3.3-3. These changes would increase the maintenance AOT of an inoperable channel from 6 to 12 hours and increase the allowed bypass time for surveillance testing from 2 to 4 hours. These changes, which were found acceptable in the staff's SE, are applicable to Functional Units 1.b, 2.b, 3.a.2, 3.b.2, 5.a, and 7.a (Automatic Actuation Logic and Relays).

8. Table 3.3-3, Functional Units 4.b and 6.b

The licensee proposed to add new Action Statement 29 to Table 3.3-3. This change would increase the maintenance AOT of an inoperable channel from 6 to 12 hours and increase the allowed bypass time for surveillance testing from 2 to 4 hours. This change, which was found acceptable in the staff's SE, is applicable to Functional Units 4.b (Automatic Actuation Logic and Actuation Relays (SSPS)-Steam Line Isolation) and 6.b (Automatic Actuation Logic and Actuation Relays (SSPS)-Auxiliary Feedwater).

9. Table 3.3-3, Functional Unit 6.g

The licensee proposed to add a new footnote to Action Statement 19 for Functional Unit 6.g (Trip of All Main Feedwater Pumps - Start Motor Driven Pumps) in Table 3.3-3. The licensee has identified a situation when loss of a train of ESFAS actuation logic will result in less than the minimum number of operable channels. Action Statement 19 currently does not address such a condition and, under the above situation, the facility would enter a forced shutdown via technical specification 3.0.3. This is inconsistent with Functional Unit 6.c (Auxiliary Feedwater - Automatic Actuation Logic and Actuation Relays (BOP ESFAS)) that has Action Statement 21 which addresses plant operation with less than the minimum number of operable channels. In order to address this situation, the licensee has proposed to add a footnote to Action Statement 19 that makes Action Statement 21 applicable whenever a train of ESFAS actuation logic is inoperable. Since the proposed change would provide similar compensatory measures, the staff finds this proposed change acceptable.

10. Table 4.3-2

The licensee has proposed to increase the STI from monthly to quarterly for a number of Functional Units of Table 4.3-2. These changes have been found to be acceptable in the staff's SE. The applicable Functional Units include 1.c (Containment Pressure - High 1), 1.d (Pressurizer Pressure - Low), 1.e (Steam Line Pressure - Low), 2.c (Containment Pressure - High 3 - Containment Spray), 3.b.3 (Containment Pressure - High 3 - Containment Isolation), 4.c (Containment Pressure - High 2), 4.d (Steam Line Pressure - Low), 4.e (Steam Line Pressure - Negative Rate - High), 5.b (Steam Generator Water Level - High-High), 6.d (Steam Generator Water Level - Low-Low), and 11.a (Pressurizer Pressure, P-11).

11. Tables 3.3-3 and 4.3-2, Functional Unit 7.b

The licensee has proposed to increase the AOT for surveillance testing and the STI for the analog channel operational test for Functional Unit 7.b (RWST Level - Low-Low Coincident with Safety Injection) of Tables 3.3-3 and 4.3-2. This Functional Unit was not addressed in WCAP-10271 and, therefore, was not addressed in the staff's SE.

Consistent with the staff-approved AOT for surveillance testing of analog channels, the licensee proposed an increase from 2 to 4 hours for the Functional Unit. The licensee proposed an extended STI from monthly to quarterly which is also similar to the staff position for analog channels.

Using a qualitative argument, the licensee demonstrated that the unavailability and risks associated with increased AOT and STI for this functional unit is equivalent to, or less than, those of other functional units included in the WCAP. Based on this finding, the staff concludes that the proposed modifications to Functional Unit 7.b are acceptable.

#### 12. BASES 3/4.3.1 and 3/4.3.2

The licensee has proposed modifying technical specification Bases 3/4.3.1 and 3/4.3.2, REACTOR TRIP SYSTEM AND ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION, to incorporate references to the staff's SE and SSE described above. The staff finds these changes appropriate and acceptable.

Since the licensee's submittal has been based on the recommendations of the staff's SE and SSE, and the licensee has adequately addressed the required findings regarding: (1) applicability of the analyses to the Wolf Creek site, and (2) concerns about setpoint drift, the staff finds the above changes to the WCGS technical specifications acceptable.

#### 5.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION

The Commission's regulations in 10 CFR 50.92 state that the Commission may make a final determination that a license amendment involves no significant hazards consideration if the operation of the facility in accordance with the amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

The proposed changes will reduce the amount of testing currently required of instrumentation and will minimize inadvertent ESFAS actuations and reactor trips during surveillance testing. Less frequent surveillance testing has been estimated by Westinghouse to result in 0.5 fewer inadvertent reactor trips, per unit, per year. As discussed in the staff's SE and SSE, the proposed changes will result in a slight increase in core damage frequency. However, the staff concluded that the increase in risk is small compared to the range of uncertainty in the core damage frequency analyses and therefore acceptable. In this regard, the staff finds that the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes to the technical specifications do not involve any design changes or hardware modifications. The proposed changes increase the surveillance test intervals of the RTS and ESFAS analog channels from monthly to quarterly. They also increase the allowed outage time to perform surveillance testing and maintenance on the analog channels. Since the



function of the RTS or ESFAS has not been altered, the staff finds that the proposed changes do not create the possibility of a new or different kind of accident from any previously analyzed.

The proposed changes do not alter the manner in which safety limits, limiting safety system settings, or limiting conditions for operation are determined. The increase in core damage frequency as discussed above has been determined to be acceptably small. Therefore, the staff finds that the proposed changes do not involve a significant reduction in a margin of safety.

Based on the above considerations, the NRC staff concludes that the amendment meets the three criteria of 10 CFR 50.92. Therefore, the NRC staff has made a final determination that the proposed amendment does not involve a significant hazards consideration.

#### 6.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Kansas State Official was notified of the proposed issuance of the amendment. The State Official has no comments.

#### 7.0 ENVIRONMENTAL CONSIDERATION

The 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 or changes a surveillance requirement. 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 the amendment involves no significant hazards consideration and there has been no public comment on such finding (56 FR 10584). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR Section 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 the amendment.

#### 8.0 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.

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