

September 30, 2005

MEMORANDUM TO: Cynthia A. Carpenter, Director
Program Management, Policy Development and Planning Staff
Office of Nuclear Reactor Regulation

FROM: Thomas H. Boyce, Section Chief */RA/*
Technical Specifications Section
Reactor Operations Branch
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

SUBJECT: FISCAL YEAR 2005 AUDIT/SELF ASSESSMENT AND
EVALUATION OF QUALITY OF PLANT CONVERSIONS
TO THE STANDARD TECHNICAL SPECIFICATIONS

In response to your request in January 2005 in the memorandum entitled "Fiscal Year 2005 Audit/Self Assessment," we are providing the enclosed self assessment for the Accelerated Review Process for plant conversions to the Standard Technical Specifications (STS), (Attachment 1, 2 and 3) in accordance with OVRST-300, "NRR Audit/self Assessment Program". The DC Cook Standard Technical Specifications Conversion was chosen as the pilot for the first use of the Accelerated Review Process.

We are also providing our review of the quality of STS Conversion in accordance with ADM-405, "Nuclear Reactor Regulation Quality Initiative Program". This is contained in Attachment 4.

Attachments: As stated

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SUBJECT: FISCAL YEAR 2005 AUDIT/SELF ASSESSMENT ACTIVITIES AND
ADM-405, THE OFFICE OF NUCLEAR REACTOR REGULATION
QUALITY INITIATIVE PROGRAM

In response to your request in January 2005 in the memorandum entitled "Fiscal Year 2005 Audit/Self Assessment," we are providing the enclosed self assessment for the Accelerated Review Process for plant conversions to the Standard Technical Specifications (STS), (Attachment 1, 2 and 3) in accordance with OVRST-300, "NRR Audit/self Assessment Program". The DC Cook Standard Technical Specifications Conversion was chosen as the pilot for the first use of the Accelerated Review Process.

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ACCELERATED REVIEW PROCESS SELF ASSESSMENT ACTIVITIES

1. Description of the Accelerated Review Process

Sixty-nine of 104 plants have converted from custom Technical Specifications (TS) to Standard Technical Specification (STS). The last plant to convert, Indian Point required twenty-three months for review due to the complexities of the conversion and increased uncertainties due to complicated beyond scope issues. The remaining plants with custom TS probably involve complex, time consuming TS conversions. Because of these complexities and uncertainties, the remaining plants with custom TS lost interest in converting their custom TS to STS by 2002. The Accelerated Review Process (ARP) was developed as a means of reducing the TS Conversion review time and encouraging the plants with custom TS to reconsider converting the STS. The ARP was tested successfully in a truncated form during the development of Revision 3 to the STS (2003/2004).

The TS Conversion review of the DC Cook Nuclear Power Plant was the first conversion review conducted using the ARP. The ARP reduces the review time for the TS Conversion by using the internet WEB page, face to face meetings and telephone conversations to expedite communications between the Nuclear Regulatory Commission (NRC) staff and the Licensee. By the NRC staff issuing its request for information through the TS Conversion Web page and the licensee counterparts responding to the request for additional information (RAI) on this Web page, time and paper work involved in a normal TS Conversion review are reduced. Furthermore, through face to face meetings and telephone conference calls between the NRC staff and their licensee counterparts review time and communications are also improved.

2. Scope/Objective Statement

The purpose of this assessment is to evaluate both the benefits of the ARP and the lessons learned for further improving the ARP over the traditional review process used for the last three Single Review TS Conversions (Attachment 3). A Single Review of a TS Conversion is one that the licensee submits one Plant Site TS Conversion for review. A Multiple Review of a TS Conversion is one that the licensee submits for multiple Plant Sites TS Conversions for review. Multiple site reviews require less time per site because of the similarity between the multiple plants which results in repetitive review processes. The Cook TS Conversion was a single review TS Conversion.

3. Method of Assessment and Standards used to Assess Program

The Method of Assessment is the comparison of the ARP to the traditional review process used for the last three Single Review TS Conversions (Palisades, Farley and Indian Point) in terms of timeliness, resources expended and quality. We also compared the Cook FTE expenditures to the budgeted expenditure items in Attachment 2. In Attachment 3, NEI Improved Technical Specifications (ITS) conversion guidelines established in NEI 96-06 were used as standards for the BSI definition and content.

4. Areas of Improvement

A benefit of ARP to the NRC stakeholders is the potential for improving the interface between the licensee, the staff and the public. The face to face meetings are public meetings and the TS Conversion WEB page is available to the public. By using the WEB page and having access to the face to face meetings, members of the public can follow the TS Conversion review from the Acceptance review through the Request for Information to the Safety Evaluation Report.

The ARP is extremely flexible. The ARP can be performed for rapid review or can be custom fitted to a Licensees schedule, resources and budget. The Monticello and Beaver Valley TS Conversion reviews are presently being arranged for completion in 12 to 15 months in place of the normal ARP time of 8 to 10 months in order to fit the licensee's resources and budget restraints. With the ARP the NRC has the option of sending the RAIs to the Licensee faster than the Licensee can respond; thereby, avoiding responsibility for causing the missed milestones during the TS Conversion review. This flexibility permits both the NRC and the licensee to better use their resources.

In addition to the Improvements described above the following improvements were also perceived:

- a. Reduction in Review Time
 1. Reduction in NRC/Licensee administrative workload: The exchange of information through the WEB page and face to face public meetings replaces formal RAIs,
 2. Reduction/Elimination in NRC Licensee Staff's retraining time between RAIs and the licensee's responses,
 3. Elimination of delays caused by Licensee's safety panel review of RAI and open item responses,
 4. Elimination of the project management of RAIs,
 5. Reduction in Licensee response time for RAIs and Open items,
 6. Elimination of multiple meetings between primary and secondary review branches.
- b. Peer pressure to maintain schedules
- c. Increase in public involvement through public meetings and the WEB Page.

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- d. NRC management can be the final arbitrator of disputes during NRC/Licensee Meeting which could result in no open items surviving the public meetings.
- e. NRC management can use the ARP as a training program to train junior personnel to replace the aging senior staff.

5. Lessons Learned

In order to further improve the ARP for future TS Conversions we compiled the ARP Lessons Learned from the Cook TS Conversion in Attachment 3. For the purpose of this discussion the lessons learned in Attachment 3 are consolidated into three categories: those involving Project Management responsibilities, (PM); those involving Technical Specification Section responsibility, (TSS) and those involving the Technical Branch responsibility, (TB). The ARP Lessons Learned are addressed below using the three before mentioned categories.

a. Project Management (PM)

- 1. A reasonable Schedule for posting questions and resolving issues resulting from the questions should be agreed upon by the staff and the licensee. For responses or closure of the issues that are taking too long, an issue resolution panel should be engaged. The panel, consisting of NRR management, Licensing and TS conversion PMs, Reviewers and Licensee Personnel, should identify individual positions and provide solutions/success paths for RAI response delays.
- 2. BSIs incorporated into the TS Conversion should be based on previous precedents and approved TSTFs.
- 3. The licensing PM should work closely with the licensee and staff to ensure that the review focuses on the issues identified in the BSI.
- 4. Management calls should be conducted at a frequency necessary to support the review.
- 5. Communications for the list of unresolved review items should be continued throughout the entire review.
- 6. NRC billing numbers should be provided monthly by the PM to the licensee.
- 7. The licensee should maintain two paths of communications; one with the licensing PM and the other with the TSS.

b. Technical Specifications Section (TSS)

- 1. BSIs should be identified by the TSS.
- 2. Technical Assistance to the TSS should not be misidentified as BSIs. Technical assistance to TSS should be charged against the TS Conversion.

c. Technical Branch (TB)

1. For less experienced TB reviewers, senior TB reviewers should screen their questions before the questions are placed on the WEB.
2. Consistent application of requirements to adopt more restrictive changes should be adopted.
3. Consistent application of requirements to remove bracketed items in the TS should be adopted.
4. BSI reviewers should be assigned to the NRC review team before the initial public meeting.

6. Resources Expended

The resources expended for the conversion portion of the DC Cook TS Conversion, the "pilot plant," as stated in Attachment 2 were less than the resources expended during a traditional TS Conversion review for the last three TS Conversions (1.24 FTE for Cook vs. 1.25, 1.40, 2.1 FTE for the three standard plants).

The lesson learned from the DC Cook Conversion dealing with focusing the subject of the RAIs and having senior reviewers screen the RAIs dealing with the Instrumentation review should lead to substantial resource savings on the Instrumentation BSIs on future ARP Beyond Scope Issues reviews. Review of the Instrumentation BSIs accounted for 976.0 hours of the 2409.9 hours of the BSI review. Reducing the number of BSIs by using the NEI guidelines for incorporating BSIs in TS Conversions (NEI 96-06) should further reduce the total hours expended on BSI reviews.

COOK TS CONVERSION REVIEW EXPENDITURES (People Hours)

DIPM	Unit 1 - 934.6	Unit 2 - 882.2	Total - 1816.8	Budget Target 3000PWR
DLPM	Unit 1 - 417.2	Unit 2 - 415.5	Total - 832.7	Budget Target 500
TR	Unit 1 - 1498.8	Unit 2 - 911.1	Total - 2409.9	Budget Target 1000
GRAND TOTAL	- 5059.4		Budget Target 4500	

The expenditures for the TS Conversion review are substantially below the budgeted target (1816.6/3000). The expenditures for the beyond scope issues reviews by NRR Technical Branches are substantially above the target (2409.9/1000); since the Cook beyond scope issues expanded the TS Conversion Review to a review that included not only the TS Conversion with typical BSIs but also a number of complex precedent setting BSIs. This expanded review is also reflected in DLPM review exceeding the target (832.7/500).

The original goal for the ARP review of the Cook TS Conversion was to conduct a sixteen-month review in eight months. The expanded BSI review resulted in the completion schedule increasing from eight to twelve months. The licensee could have maintained the eight-month schedule if they moved the complex BSI to a review path outside of the TS Conversion, which would have resulted in the complex BSIs being completed after the TS Conversion. However, the licensee's decision was to complete the BSI reviews, which must have better satisfied their requirements.

The lessons learned from the Cook TS Conversion contain recommendations for moderating the scope of the BSI in order to accelerate the review or accommodate the licensee's request to perform the review in a longer set time frame. Licensees seem to prefer a schedule that extends the ARP to fit their resource needs which are strained by performing TS Conversions concurrently with power upgrades, plant life extensions, etc. Extending the ARP schedule also enables the licensee to incorporate LARs, TSTFs and Topical reports into their TS that are approved during the longer TS Conversion Review. The over expenditure for the ARP (5059.4/4500) could be considered well spent since it enables the licensee to efficiently incorporate the latest upgrades into their TS and enables the staff to more efficiently review these changes during the TS Conversion.

COOK EXPENDITURES COMPARED TO THE LAST THREE PWR SINGLE APPLICATION REVIEWS

The last three PWR single unit reviews were Palisades (11/99), Farley (11/99) and Indian Point (3/01). Their DIPM expenditures were 1.25 FTE, 1.40 FTE and 2.10 FTE respectively. There was a steady trend upward which was reversed by the Cook Conversion, which required 1.24 FTE. When the average of the three reviews was compared to Cook, a substantial savings is noted (1.58 FTE for the average to 1.24 FTE for Cook).

The DLPM expenditures for the last three single unit reviews were .40 FTE, .70 FTE and .85 FTE respectively. This compares to the Cook DPLM expenditures of .57 FTE, which is below the average of the last three single unit reviews (.65 FTE) and also shows a trend reversal.

The Tech Branch (TB) Review expenditures for the last three single unit reviews were .55 FTE, .40 FTE, and .05 FTE. This compares to the Cook review TR expenditures of 1.65 FTE. This increase in the TB expenditures for Cook can be attributed to the large number of Cook BSIs and the precedent setting and complex nature of several of the BSIs.

ACCELERATED REVIEW PROCESS ITS LESSONS LEARNED

The following lessons learned from the Accelerated Review Process (ARP) address the internal operation of the ARP that involve the interactions between the Licensee's review staff and the NRC review staff. For this purpose the ARP lessons learned are grouped as Ground Rules for conducting a TS Conversion Review. ITS Conversion Ground Rules need to be established to provide a baseline for efficient exchange of information between the NRC and Licensee and also to capture the lessons learned from previous efforts.

The following list of expectations/lessons learned should be considered when creating a working environment for the NRC and the Licensee:

ITS Conversion Ground Rules

1. Review Times for RAI's - A reasonable time expectation for posting/answering/closing questions in the database should be agreed upon. This should include details associated with:
 - a. An acceptable response time by the licensee,
 - b. An acceptable response review time by the NRC,
 - c. The expectation on timely closure for those questions that are responded to satisfactorily,
 - d. For those questions that require additional information from the licensee, the expectation on review and response should also be considered,
 - d. Precedence/ Past precedence/repeatability should be considered when establishing expectations on review times and effort.

For those responses or closure resolutions that are taking too long, based on the previously agreed upon guidelines, an issue resolution panel should be engaged. The panel, consisting of NRR management, Licensing and TS Conversion PMs, Reviewers (only on specific technical items) and Licensee personnel, should identify individual positions and provide solutions/success paths for RAI response delays.

2. BSI Definition - Changes which are in addition to the direct conversion of CTS to ITS have been labeled "Beyond Scope Issues." The current guidance on defining a "BSI" can be found in NEI 96-06. It describes potential "beyond scope" or licensing basis changes as those that are both different from than the CTS and the STS.

NEI 96-06 also provides guidance on the acceptability of including beyond scope issues in the conversion. It supports those changes which are in addition to the direct conversion of the CTS to the ITS but which may be included within the scope of an ITS conversion application incorporation of Generic Letter line item improvements (including

extending surveillance frequencies to 24 months in accordance with Generic Letter 91-04), incorporation of generically approved topical reports, (AOT-STI), and generically approved risk based changes.

Changes which are considered beyond the scope of an ITS conversion application, and therefore may result in delays in the review and approval of the application, include plant-specific risk based changes, and power uprate.

It is appropriate for NRC TS Section reviewers to obtain, when required, technical assistance, which is not a BSI, including concurrences from other NRR Sections and Branches; however, the responsibility for issue identification as non BSI technical assistance and their closure should remain with the NRC assigned reviewer for the associated TS Section.

DLPM's method to correct this is for the Technical Branch reviewer to charge his work for technical assistance to the TS Conversion TACs and use the TRIM system to track the reviewer's completion. The TS Conversion reviewer would monitor this technical assistance work.

TSS's method to correct the mischarging is to use a TAC for each unit which is issued and monitored by TSS. With this method the charges would be separated from the TS Conversion TACs. The TS Conversion reviewer would also monitor this technical assistance work.

Closure of BSIs is the responsibility of the Licensing PM. A mutual understanding, of the beyond scope concept, is required by both the Licensee and NRC to ensure the correct identification of beyond scope issues. The ultimate transfer of review responsibility for the issue in question is to the NRC licensing PM for the facility conversion with appropriate NRC technical support staff.

3. BSI Schedule Impact - When a licensee submits an ITS conversion that includes precedent setting BSIs or unapproved TSTFs, the licensee assumes they will be approved; consequently, the review of those BSIs and TSTFs may potentially control the schedule. Previously established conversion guidance permits only those BSIs that are not precedent setting and approved TSTFs to be incorporated into the conversion. Therefore, during the acceptance review and/or initial public meeting, an effort should be made to identify any precedent setting changes incorporated in the proposed license amendment. Precedent-setting BSIs, unapproved TSTFs and outstanding LARs subsequently identified during the staff's review should be removed from the conversion and reviewed in a parallel path outside of the ITS Conversion review. Each BSI element should receive individual schedule milestones that support the ITS conversion schedule milestones for completion.
4. BSI Reviewers - A BSI review can be very complicated and time consuming. An NRC BSI Project Manager and BSI technical reviewers should be assigned and made part of the NRC review team during the initial public meeting. They should be trained with the team during the initial review and be informed of the

precedent/non-precedent discussions. The BSI review and the conversion review need to track parallel paths for a timely completion for the entire license amendment review.

5. BSI Communication/Expectations - During the informal RAI process supporting BSI issues, the issue resolution process may stall due to poor communication/information exchange. As a result, the original issue is sometimes lost or misunderstood. It is important that the Q&A process maintains a keen focus on identified issues through out the issue resolution process. The licensing PM should work closely with the licensee and the staff to ensure that the review focuses on the issues identified by the BSI.
6. BSI Reviewer Questions - Reviewer's questions should fully describe the potential issues/concerns and stay within the scope of the conversion. Reviewer's questions have sometimes tended to be very narrow in scope and have led to additional rounds of questions to fully address the potential issue/concern. In turn, this can cause a gradual loss of focus on the original issues/concerns, excessive redundant review, and an inefficient use of staff and licensee resources and time.

A recommendation, especially for the less experienced reviewers, is that questions be screened by a more senior reviewer prior to being placed on the web page. Alternatively the appropriate the NRC STS Section reviewer, the TS Section conversion lead or the licensing Project Manager could review each BSI-reviewer question before it is added to the question data base via the web page. This approach will help the NRC Project Manager and the TS Section conversion lead maintain the expected quality standards and awareness of issues as they develop.

7. More Restrictive Changes - Consistent application of requirements/justification to include more restrictive changes in an ITS Conversion is required. Inconsistent application of requirements to adopt more restrictive changes has been experienced in recent conversions. This inconsistency has resulted in an inefficient use of resources and tends to shift the focus from more important justifications to proposed changes that could very well be optional for the licensee. During the RAI oversight discussed in 6. inconsistencies in the application of requirements/justifications for more restrictive changes should be identified and addressed.
8. Removal of Brackets - NEI 01-03, Writers Guide for the Improved Technical Specifications, provides guidance for removal of bracketed items in the STS. There has been an inconsistent level of detail required to justify the removal of brackets and the replacement of information inside the brackets. Licensee and NRC Project Management need to agree on specific acceptable criteria for bracket removal and information replacement. During the RAI oversight discussed in 6 inconsistencies in the application of requirements/justifications for the removal of brackets should be identified and addressed.

9. Weekly Management Calls - The weekly management calls were very effective. The frequency of the calls need not be rigidly defined as weekly. The frequency of the calls should be varied to satisfy the requirements of the review.
10. Identification of Unresolved Review Items - Communications for the list of resolving the unresolved review items identified in the data base decreased when the number of unresolved items was about ten. Communications with TSS needs to be maintained during the period of less than 10 unresolved items.
11. Controlling and Tracking of Hours - The quarterly billing numbers provided to the licensee are received by the licensee four to six weeks after the quarter ends. The licensing PM should provide these numbers in advance each month to the licensee.
12. Communications - During the TS Conversion review the licensee should maintain two paths of communications with NRR; one path with the Licensing PM and the other with TSS

ACCEPTANCE REVIEW AND TECHNICAL SPECIFICATION ISSUANCE FOR THE
DC COOK TS CONVERSION

The DC Cook Technical Specification (TS) Conversion began with a staff evaluation of the licensee's submittal during the Acceptance Review. In order for the staff to implement the Accelerated Review Process (ARP), with its streamlined review process, the licensee's TS conversion submittal must be at a higher quality with a higher content level than a TS conversion submittal for a conventional review. With the higher quality licensee submittal the final approved TS for the DC Cook Plant should reflect an increase in quality.

Over the years the TS Conversions Safety Evaluation Reports have shown a steady rise in quality. For the Cook TS Conversion, the SER was based on the Palisades TS Conversion SER. The Palisades SER was chosen for the Cook SER basis because it was considered by DLPM to be the highest quality TS Conversion SER of the last five years.

The licensee seems to prefer a schedule that extended the ARP to fit their resource needs that are strained by performing the TS Conversion concurrently with power upgrade and the plant life extension. Extending the ARP schedule also enabled the licensee to incorporate LARs, TSTFs and Topical reports into their TS that were approved during the TS Conversion Review. The over expenditure for the ARP (5059.4/4500, Attachment 2) could be considered well spent since it enabled the licensee to efficiently incorporate the latest upgrades into their TS and enabled the staff to more efficiently review these beyond scope changes during the TS Conversion. This resulted in a quality enhancement for the NRR TS Conversion review process and the improved TS developed from the Cook review.

The final DC Cook TS have several improvements over the previous plant TS, incorporating both safety enhancements and operational efficiency enhancements (relief from unnecessary burdens). These improvements resulted from better communications between the staff, the licensee and the public and the improved exchange of information methodology developed for the ARP. Because of the extensive number of TS improvement changes several lists of these changes are provided in categories based on the systems affected by the change.

A listing of some of changes involving electrical and instrumentation systems are as follows:

- (1.) Extending the channel frequency test for Degraded Voltage Relays and Loss of Voltage Relays from 30 days to 184 days;
- (2.) Revising the Allowable Values for all the ESF Instrumentation Functions;
- (3.) Revising the Allowable Values for 4 kV Degraded Voltage;
- (4.) Adopting the for General Electric STS (NUREGs 1433 and 1434) format for Section 3.3.1, "Reactor Trip System (RTS) Instrumentation" and Section 3.3.2, "Engineered Safety Feature Actuation System (ESFAS)

Attachment 4

A listing of some of the changes involving reactor systems are as follows:

- (1.) Revising the Allowable Values in the CTS to the Allowable Values of the STS for Overtemperature (T), Overpower delta T (Unit 1 only), Pressurizer Pressure - Low (Unit 2 only), Pressurizer Pressure - High, Pressurizer Water Level - High, Steam Generator Water Level - Low Low (Unit 1 only), Steam Generator water level - Low, (Unit 1 only) and Underfrequency - Reactor Coolant Pumps;
- (2.) Extending the bypassing of the inoperable channel from 1 hour to 6 hours for (a.) Safety Injection Containment Pressure - High, (b.) Safety Injection Pressurizer Pressure - Low; (c.) Safety Injection Pressure Between Steam Lines - High, (d.) Safety Injection Steam Line Pressure Flow in Two Steam Lines - High Coincident with Tavg - Low Low; (e.) Steam Isolation Steam Line Pressure - Low; (f.) Turbine Trip and Feedwater Isolation Steam Generator Water Level - High High, (g.) Motor Driven Auxiliary Feedwater Pumps Steam Generator Water Level - Low Low and (h.) Turbine Driven Auxiliary Feedwater Pumps Steam Generator Water Level - Low Low., Containment Spray Pressure - High High;

A listing of some of the changes involving plant systems is as follows:

- (1.) Extending the Control Room Emergency Ventilation System surveillance test interval for each train from every 31 days on a staggered basis to every 62 days on a staggered basis;
- (2.) Extending the ESF Ventilation System surveillance test interval for each train from every 31 days to every 92 days;
- (3.) Decreasing the number of operable refueling canal drains from 3 to 2;
- (4.) Replacing the requirement to verify the operable refueling canals are unplugged with verifying that the upper containment and refueling canal are free of debris;
- (5.) Increasing the operable volume for the Condensate Storage Tank from 175,000 gallons to 182,000 gallons;
- (6.) Increasing the requirements for the control room air conditioning system cooling capability from maintaining the CR temperature less than or equal to 95 degrees F with both trains to less than or equal to 85 degrees F with one train;
- (7.) Adding to the Fuel Handling Area Exhaust Ventilation System (FHAEV) TS the surveillance requirements to verify the FHAEV is in operation and the actions to take if the required FHAEV train is not in operation;
- (8.) Revising the Allowable Values Turbine Trip - Low Fluid Oil Pressure and Turbine Trip - Turbine Stop Valve Closure Trip;

- (9.) Extending the Test Frequency from 31 days to 92 days for the Master Relay Test of the Turbine Trip and Feedwater Isolation Instrumentation and the Master Relay Test for the motor driven Auxiliary Feedwater Pumps;
- (10.) Extending the Test Frequency from 18 to 24 months for the (a.) Channel Calibration for Turbine Trip - Low Fluid Oil Pressure and Turbine Trip - Turbine Stop Valve Closure Trip and STI, (b.) Slave Relay Test for Turbine Trip and Feedwater Isolation Instrumentation and (c.) Slave Relay Test for motor driven Auxiliary Feedwater Pumps;

A listing of some of the changes involving containment systems is as follows:

- (1.) Decreasing the number of operable manual channels for the Containment Purge Supply and Exhaust Manual Initiation Function from 2 channels per train to one per train;
- (2.) Extending bypassing of the inoperable Containment Air Circulation Fan Automatic Actuation Logic channel from 2 hours to 4 hours;
- (3.) Extending the bypassing of the inoperable Containment Air Circulation Fan, Containment Pressure High from 1 hour to 6 hours;
- (4.) Extending the bypassing of the inoperable channel from 2 hours to 4 hours for (a.) Safety Injection Automatic Actuation Logic, (b.) Containment Spray Automatic Actuation Logic, (c.) Containment Isolation Phase "B" Isolation Automatic Actuation Logic, (d.) Steam Line Isolation Automatic Actuation Logic, (e.) Containment Isolation Phase "B" Isolation Containment Pressure - High High, (f.) Steam Line Isolation Containment Pressure - High High, and (g.) Turbine Driven Auxiliary Feedwater Pumps Reactor Coolant Pump Bus Undervoltage;
- (5.) Extending the Hydrogen Analyzer channel calibration surveillance from 46 days to 92 days;
- (6.) Extending the Hydrogen Igniters test interval from 92 days to 184 days;
- (7.) Extending the surveillance for Hydrogen Igniters temperature verification from 18 months to 24 months.