Attachment I to IPN-84-59

Proposed Technical Specification Changes

Regarding

Decay Heat Removal Capability

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
December 3, 1984

3. LIMITING CONDITIONS FOR OPERATION

For the cases where no exception time is specified for inoperable components, this time is assumed to be zero.

3.1 REACTOR COOLANT SYSTEM

Applicability

Applies to the operating status of the Reactor Coolant System; operational components; heatup; cooldown; criticality; activity; chemistry and leakage.

Objective

To specify those limiting conditions for operation of the Reactor Coolant System which must be met to ensure safe reactor operation.

Specification

A. OPERATIONAL COMPONENTS

1. Coolant Pumps

a. When a reduction is made in the boron concentration of the reactor coolant, at least one reactor coolant pump or one residual heat removal pump (connected to the Reactor Coolant System) shall be in operation.

b. When the reactor coolant system Tavg is greater than 350°F and electrical power is available to the reactor coolant pumps, and as permitted during special plant evolutions, at least one reactor coolant pump shall be in operation. All reactor coolant pumps may be de-energized for up to 1 hour provided no operations are permitted that would cause dilution of the reactor coolant system boron concentration, and core outlet temperature is maintained at least 10°F below saturation temperature.

c. When the reactor coolant system Tavg is greater than 200°F and less than 350°F, and as permitted during special plant evolutions, at least one reactor coolant pump or one residual heat removal pump (connected to the Reactor Coolant System) shall be in operation. All reactor coolant pumps may be de-energized with RHR not in service for up to 1 hour provided no operations are permitted that would cause dilution of the reactor coolant system boron concentration, and core outlet temperature is maintained at least 10°F below saturation temperature.

d. When the reactor coolant system Tavg is less than 200°F, but not in the refueling operation condition, and as permitted during special plant evolutions, at least one residual heat removal pump (connected to the Reactor Coolant System) shall be in operation.

e. When the reactor is critical and above 2% rated power, except for natural circulation tests, at least two reactor coolant pumps shall be in operation.

f. The reactor shall not be operated at power levels above 10% rated power with less than four (4) reactor coolant loops in operation.

g. If the requirements of 3.1.A.1.e and 3.1.A.1.f above cannot be satisfied, the reactor shall be brought to the hot shutdown condition within 1 hour.

Basis

When the boron concentration of the Reactor Coolant System is to be reduced the process must be uniform to prevent sudden reactivity changes in the reactor. Mixing of the reactor coolant will be sufficient to maintain a uniform boron concentration if at least one reactor coolant pump or one residual heat removal pump is running while the change is taking place. The residual heat removal pump will circulate the primary system volume in approximately one half hour. The pressurizer is of no concern because of the low pressurizer volume and because the pressurizer boron concentration will be higher than that of the rest of the reactor coolant.

Heat transfer analyses show that reactor heat equivalent to 10% of rated power (P-7) can be removed with natural circulation only (1); hence, the requirement for one operating RCP above 350°F and two operating RCP's above 2% rated power provides a substantial safety factor. In addition, a single RCP or RHR pump (connected to the RCS) provides sufficient heat removal capability for removing decay heat.

The reactor shall not be operated at power levels above 10% rated power with less than four (4) reactor coolant loops in operation until safety analyses for less than four loop operation have been submitted by the licensee and approval for less than four loop operation at power levels above 10% rated power has been granted by the Commission. (See license condition 2.C.(3))

Each of the pressurizer code safety valves is designed to relieve 420,000 lbs. per hr. of saturated steam at the valve set point.

If no residual heat were removed by the Residual Heat Removal System the amount of steam which could be generated at safety valve relief pressure would be less than half the capacity of a single valve. One valve therefore provides adequate protection for overpressurization.

The combined capacity of the three pressurizer safety valves is greater than the maximum surge rate resulting from complete loss of load (2) without a direct reactor trip or any other control.

The requirement that 150 kw of pressurizer heaters and their associated controls be capable of being supplied electrical power from an emergency bus provides assurance that these heaters can be energized during a loss of offsite power condition to maintain natural circulation at hot shutdown.

The power operated relief valves (PORVS) operate to relieve RCS pressure below the setting of the pressurizer code safety valves. These relief valves have remotely operated block valves to provide a positive shutoff capability should a relief valve become inoperable. The electrical power for both the relief valves and the block valves is capable of being supplied from an emergency power source to ensure the ability to seal off possible RCS leakage paths.

References

1) FSAR Section 14.1.6

2) FSAR Section 14.1.8

5. If the Safety Injection and Residual Heat Removal Systems are not restored to meet the requirements of 3.3.A.3 within the time periods specified in 3.3.A.4; then:

   a. If the reactor is critical, it shall be in the hot shutdown condition within four hours and the cold shutdown condition within the following 24 hours.

   b. If the reactor is subcritical, the reactor coolant system temperature and pressure shall not be increased more than 25°F and 100 psi, respectively, over existing values. If the requirements of 3.3.A.3 are not satisfied within an additional 48 hours, the reactor shall be brought to the cold shutdown condition using normal operating procedures. The shutdown shall start no later than the end of the 48 hour period.

6. When the reactor coolant system Tavg is greater than 200°F and less than 350°F, the following decay heat removal requirements shall be met:

   a. Two residual heat removal pumps together with their associated heat exchangers, piping, and valves shall be operable, OR

   b. A minimum of one residual heat removal pump and heat exchanger and a minimum of one reactor coolant pump and steam generator together with their associated piping and valves, shall be operable, OR

   c. A minimum of two reactor coolant pumps and two steam generators, together with their associated piping and valves, shall be operable, OR

   d. With less than the above operable, initiate corrective action to return the required equipment to an operable status as soon as possible and suspend any operations which would reduce the boron concentration of the reactor coolant system. Otherwise, if sufficient equipment is available, be in cold shutdown within 20 hours.

7. When the reactor coolant Tavg is less than 200°F, but not in the refueling operation condition, two residual heat removal pumps together with their associated heat exchangers, piping and valves shall be operable.

   a. With less than the above operable, initiate corrective action to return the required equipment to an operable status as soon as possible and suspend any operations which would reduce the boron concentration of the reactor coolant system.

   b. The above requirements may be suspended during maintenance, modifications, testing, inspection or repair provided that:

      1) an alternate means of decay heat removal is available and return of the system within sufficient time to prevent exceeding cold shutdown requirements is assured;

2) RCS temperature and the source range detectors are monitored hourly; and

3) no operations are permitted which would reduce the boron concentration of the reactor coolant system.

B. Containment Cooling and Iodine Removal Systems

1. The reactor shall not be brought above the cold shutdown condition unless the following requirements are met:

   a. The spray additive tank contains a minimum of 4000 gallons of solution with a sodium hydroxide concentration of not less than 30% by weight.

   b. The five fan cooler-charcoal filter units and the two spray pumps, with their associated valves and piping, are operable.

2. The requirements of 3.3.B.1 may be modified to allow any one of the following components to be inoperable at one time:

During operating modes in the temperature range between 200°F and 350°F, a sufficient decay heat removal capability is provided by a reactor coolant pump with a steam generator heat sink or a residual heat removal loop. This redundancy ensures that a single failure will not result in a complete loss of decay heat removal.

During operating modes when the reactor coolant Tavg is less than 200°F, but not in the refueling operation condition, a sufficient decay heat removal capability is provided by a residual heat removal loop.

7. The containment vent and purge system, including the radiation monitors which initiate isolation, shall be tested and verified to be operable within 100 hours prior to refueling operations.

8. No movement of irradiated fuel in the reactor shall be made until the reactor has been subcritical for a least 120 hours. In addition, movement of fuel in the reactor before the reactor has been subcritical for equal to or greater than 365 hours will necessitate operation of the Containment Building Vent and Purge System through the HEPA filters and charcoal adsorbers. For this case operability of the Containment Building Vent and Purge System shall be established in accordance with Section 4.13 of the Technical Specifications. In the event that more than one region of fuel (72 assemblies) is to be discharged from the reactor, those assemblies in excess of one region shall not be discharged before the interval of 400 hours has elapsed after shutdown.

9. Whenever movement of irradiated fuel is being made, the minimum water level in the area of movement shall be maintained 23 feet over the top of the reactor pressure vessel flange.

10. Hoists or cranes utilized in handling irradiated fuel shall be dead-load tested before movement begins. The load assumed by the hoists or cranes for this test must be equal to or greater than maximum load to be assumed by the hoists or cranes during the refueling operation. A thorough visual inspection of the hoists or cranes shall be made after the dead-load test and prior to fuel handling. A test of interlocks shall also be performed.

11. The fuel storage building emergency ventilation system shall be operable whenever irradiated fuel is being handled within the fuel storage building. The emergency ventilation system may be inoperable when irradiated fuel is in the fuel storage building, provided irradiated fuel is not being handled and neither the spent fuel cask nor the cask crane are moved over the spent fuel pit during the period of inoperability.

12. To ensure redundant decay heat removal capability, at least two of the following requirements shall be met:

    a. No. 31 residual heat removal pump and heat exchanger, together with their associated piping and valves is operable.

    b. No. 32 residual heat removal pump and heat exchanger, together with their associated piping and valves is operable.

    c. The water level in the refueling cavity above the top of the reactor vessel flange is equal to or greater than 23 feet.

The requirement for the fuel storage building emergency ventilation system to be operable is established in accordance with standard testing requirements to assure that the system will function to reduce the offsite dose to within acceptable limits in the event of a fuel-handling accident. The system is actuated upon receipt of a signal from the area high activity alarm or by a manually-operated switch. The system is tested prior to fuel handling and is in a standby basis.

When fuel in the reactor is moved before the reactor has been subcritical for at least 365 hours, the limitations on the containment vent and purge system ensure that all radioactive material released from an irradiated fuel assembly will be filtered through the HEPA filters and charcoal adsorbers prior to discharge to the atmosphere.

The limit to have at least two means of decay heat removal operable ensures that a single failure of the operating RHR System will not result in a total loss of decay heat removal capability. With the reactor head removed and 23 feet of water above the vessel flange, a large heat sink is available for core cooling. Thus, in the event of a single component failure, adequate time is provided to initiate diverse methods to cool the core.

The minimum spent fuel pit boron concentration and the 90-day restriction of the movement of the spent fuel cask to allow the irradiated fuel to decay were specified in order to minimize the consequences of an unlikely sideways cask drop.

When the spent fuel cask is being placed in or removed from its position in the spent fuel pit, mechanical stops incorporated in the bridge rails make it impossible for the bridge of the crane to travel further north than a point directly over the spot reserved for the cask in the pit. Thus, it will be possible to handle the spent fuel cask with the 40-ton hook and to move new fuel to the new fuel elevator with a 5-ton hook, but it will be impossible to carry any object over the spent fuel storage area with either the 40 or 5-ton hook of the fuel storage building crane.

Attachment II to IPN-84-59

Safety Evaluation of

Proposed Technical Specification Changes Regarding

Decay Heat Removal Capability

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
December 3, 1984

Section I - Description of the Change

This application seeks to supplement the changes previously proposed for Section 3.1 of Appendix A to the Operating License in the Authority's July 6, 1983 submittal regarding decay heat removal capability in response to the Commission's October 15, 1984 letter. The changes associated with Sections 3.3 and 3.8 of Appendix A to the Operating License are as previously proposed in the Authority's July 6, 1983 letter. The "Evaluation of the Change" encompasses the changes proposed for Section 3.1 as well as the changes previously proposed for Sections 3.3 and 3.8 of Appendix A to the Operating License.

Section II - Evaluation of the Change

The purpose of this change is to provide for sufficient decay heat removal capability by assuring that: 1) at least two decay heat removal paths are available when the reactor coolant system Tavg is below 350°F, 2) at least one reactor coolant pump or RHR pump (connected to the reactor coolant system) is operating when the reactor coolant system Tavg is below 350°F but not in the refueling operation condition, and 3) at least one reactor coolant pump is operating when the reactor coolant system Tavg is greater than 350°F.

When the reactor coolant system Tavg is less than 200°F, but not in the refueling operation condition, exception has been taken to providing two decay heat removal paths in the unlikely event that both RHR pumps are out of service due to maintenance, modifications, testing, inspection, or repair. This exception is acceptable due to the unlikely nature of this situation and since the proposed T/S would require an alternate means of decay heat removal to be available and that the system be returned to operable status within sufficient time to prevent cold shutdown requirements from being exceeded.

The Authority considers that this proposed change can be classified as not likely to involve significant hazards considerations since the proposed change "constitutes an additional limitation, restriction, or control not presently included in the technical specifications." (Example (ii), Federal Register, Vol. 48, No. 67 dated April 6, 1983, page 14870).

Section III - Impact of the Change

This change will <u>not</u> impact the following:

- ALARA Program
- Fire Protection Program
- Emergency Plan
- FSAR or SER Conclusions
- Overall Plant Operations

SECTION IV - Conclusion

The incorporation of these changes: a) will not increase the probability nor the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report; b) will not increase the possibility for an accident or malfunction of a different type than any evaluated previously in the Safety Analysis Report; c) will not reduce the margin of safety as defined in the basis for any Technical Specification; d) do not constitute an unreviewed safety question; and e) involves no significant hazards considerations as defined in 10CFR50.92.

SECTION V- References

(a) IP3 FSAR

(b) IP3 SER

Attachment I to IPN-84-59

Proposed Technical Specification Changes

Regarding

Decay Heat Removal Capability

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
December 3, 1984

3. LIMITING CONDITIONS FOR OPERATION

For the cases where no exception time is specified for inoperable components, this time is assumed to be zero.

3.1 REACTOR COOLANT SYSTEM

Applicability

Applies to the operating status of the Reactor Coolant System; operational components; heatup; cooldown; criticality; activity; chemistry and leakage.

Objective

To specify those limiting conditions for operation of the Reactor Coolant System which must be met to ensure safe reactor operation.

Specification

A. OPERATIONAL COMPONENTS

1. Coolant Pumps

a. When a reduction is made in the boron concentration of the reactor coolant, at least one reactor coolant pump or one residual heat removal pump (connected to the Reactor Coolant System) shall be in operation.

b. When the reactor coolant system Tavg is greater than 350°F and electrical power is available to the reactor coolant pumps, and as permitted during special plant evolutions, at least one reactor coolant pump shall be in operation. All reactor coolant pumps may be de-energized for up to 1 hour provided no operations are permitted that would cause dilution of the reactor coolant system boron concentration, and core outlet temperature is maintained at least 10°F below saturation temperature.

c. When the reactor coolant system Tavg is greater than 200°F and less than 350°F, and as permitted during special plant evolutions, at least one reactor coolant pump or one residual heat removal pump (connected to the Reactor Coolant System) shall be in operation. All reactor coolant pumps may be de-energized with RHR not in service for up to 1 hour provided no operations are permitted that would cause dilution of the reactor coolant system boron concentration, and core outlet temperature is maintained at least 10°F below saturation temperature.

d. When the reactor coolant system Tavg is less than 200°F, but not in the refueling operation condition, and as permitted during special plant evolutions, at least one residual heat removal pump (connected to the Reactor Coolant System) shall be in operation.

e. When the reactor is critical and above 2% rated power, except for natural circulation tests, at least two reactor coolant pumps shall be in operation.

f. The reactor shall not be operated at power levels above 10% rated power with less than four (4) reactor coolant loops in operation.

g. If the requirements of 3.1.A.1.e and 3.1.A.1.f above cannot be satisfied, the reactor shall be brought to the hot shutdown condition within 1 hour.

Basis

When the boron concentration of the Reactor Coolant System is to be reduced the process must be uniform to prevent sudden reactivity changes in the reactor. Mixing of the reactor coolant will be sufficient to maintain a uniform boron concentration if at least one reactor coolant pump or one residual heat removal pump is running while the change is taking place. The residual heat removal pump will circulate the primary system volume in approximately one half hour. The pressurizer is of no concern because of the low pressurizer volume and because the pressurizer boron concentration will be higher than that of the rest of the reactor coolant.

Heat transfer analyses show that reactor heat equivalent to 10% of rated power (P-7) can be removed with natural circulation only (1); hence, the requirement for one operating RCP above 350°F and two operating RCP's above 2% rated power provides a substantial safety factor. In addition, a single RCP or RHR pump (connected to the RCS) provides sufficient heat removal capability for removing decay heat.

The reactor shall not be operated at power levels above 10% rated power with less than four (4) reactor coolant loops in operation until safety analyses for less than four loop operation have been submitted by the licensee and approval for less than four loop operation at power levels above 10% rated power has been granted by the Commission. (See license condition 2.C.(3))

Each of the pressurizer code safety valves is designed to relieve 420,000 lbs. per hr. of saturated steam at the valve set point.

If no residual heat were removed by the Residual Heat Removal System the amount of steam which could be generated at safety valve relief pressure would be less than half the capacity of a single valve. One valve therefore provides adequate protection for overpressurization.

The combined capacity of the three pressurizer safety valves is greater than the maximum surge rate resulting from complete loss of load (2) without a direct reactor trip or any other control.

The requirement that 150 kw of pressurizer heaters and their associated controls be capable of being supplied electrical power from an emergency bus provides assurance that these heaters can be energized during a loss of offsite power condition to maintain natural circulation at hot shutdown.

The power operated relief valves (PORVS) operate to relieve RCS pressure below the setting of the pressurizer code safety valves. These relief valves have remotely operated block valves to provide a positive shutoff capability should a relief valve become inoperable. The electrical power for both the relief valves and the block valves is capable of being supplied from an emergency power source to ensure the ability to seal off possible RCS leakage paths.

References

1) FSAR Section 14.1.6

2) FSAR Section 14.1.8

5. If the Safety Injection and Residual Heat Removal Systems are not restored to meet the requirements of 3.3.A.3 within the time periods specified in 3.3.A.4; then:

   a. If the reactor is critical, it shall be in the hot shutdown condition within four hours and the cold shutdown condition within the following 24 hours.

   b. If the reactor is subcritical, the reactor coolant system temperature and pressure shall not be increased more than 25°F and 100 psi, respectively, over existing values. If the requirements of 3.3.A.3 are not satisfied within an additional 48 hours, the reactor shall be brought to the cold shutdown condition using normal operating procedures. The shutdown shall start no later than the end of the 48 hour period.

6. When the reactor coolant system Tavg is greater than 200°F and less than 350°F, the following decay heat removal requirements shall be met:

   a. Two residual heat removal pumps together with their associated heat exchangers, piping, and valves shall be operable, OR

   b. A minimum of one residual heat removal pump and heat exchanger and a minimum of one reactor coolant pump and steam generator together with their associated piping and valves, shall be operable, OR

   c. A minimum of two reactor coolant pumps and two steam generators, together with their associated piping and valves, shall be operable, OR

   d. With less than the above operable, initiate corrective action to return the required equipment to an operable status as soon as possible and suspend any operations which would reduce the boron concentration of the reactor coolant system. Otherwise, if sufficient equipment is available, be in cold shutdown within 20 hours.

7. When the reactor coolant Tavg is less than 200°F, but not in the refueling operation condition, two residual heat removal pumps together with their associated heat exchangers, piping and valves shall be operable.

   a. With less than the above operable, initiate corrective action to return the required equipment to an operable status as soon as possible and suspend any operations which would reduce the boron concentration of the reactor coolant system.

   b. The above requirements may be suspended during maintenance, modifications, testing, inspection or repair provided that:

      1) an alternate means of decay heat removal is available and return of the system within sufficient time to prevent exceeding cold shutdown requirements is assured;

2) RCS temperature and the source range detectors are monitored hourly; and

3) no operations are permitted which would reduce the boron concentration of the reactor coolant system.

B. Containment Cooling and Iodine Removal Systems

1. The reactor shall not be brought above the cold shutdown condition unless the following requirements are met:

   a. The spray additive tank contains a minimum of 4000 gallons of solution with a sodium hydroxide concentration of not less than 30% by weight.

   b. The five fan cooler-charcoal filter units and the two spray pumps, with their associated valves and piping, are operable.

2. The requirements of 3.3.B.1 may be modified to allow any one of the following components to be inoperable at one time:

During operating modes in the temperature range between 200°F and 350°F, a sufficient decay heat removal capability is provided by a reactor coolant pump with a steam generator heat sink or a residual heat removal loop. This redundancy ensures that a single failure will not result in a complete loss of decay heat removal.

During operating modes when the reactor coolant Tavg is less than 200°F, but not in the refueling operation condition, a sufficient decay heat removal capability is provided by a residual heat removal loop.

7. The containment vent and purge system, including the radiation monitors which initiate isolation, shall be tested and verified to be operable within 100 hours prior to refueling operations.

8. No movement of irradiated fuel in the reactor shall be made until the reactor has been subcritical for a least 120 hours. In addition, movement of fuel in the reactor before the reactor has been subcritical for equal to or greater than 365 hours will necessitate operation of the Containment Building Vent and Purge System through the HEPA filters and charcoal adsorbers. For this case operability of the Containment Building Vent and Purge System shall be established in accordance with Section 4.13 of the Technical Specifications. In the event that more than one region of fuel (72 assemblies) is to be discharged from the reactor, those assemblies in excess of one region shall not be discharged before the interval of 400 hours has elapsed after shutdown.

9. Whenever movement of irradiated fuel is being made, the minimum water level in the area of movement shall be maintained 23 feet over the top of the reactor pressure vessel flange.

10. Hoists or cranes utilized in handling irradiated fuel shall be dead-load tested before movement begins. The load assumed by the hoists or cranes for this test must be equal to or greater than maximum load to be assumed by the hoists or cranes during the refueling operation. A thorough visual inspection of the hoists or cranes shall be made after the dead-load test and prior to fuel handling. A test of interlocks shall also be performed.

11. The fuel storage building emergency ventilation system shall be operable whenever irradiated fuel is being handled within the fuel storage building. The emergency ventilation system may be inoperable when irradiated fuel is in the fuel storage building, provided irradiated fuel is not being handled and neither the spent fuel cask nor the cask crane are moved over the spent fuel pit during the period of inoperability.

12. To ensure redundant decay heat removal capability, at least two of the following requirements shall be met:

    a. No. 31 residual heat removal pump and heat exchanger, together with their associated piping and valves is operable.

    b. No. 32 residual heat removal pump and heat exchanger, together with their associated piping and valves is operable.

    c. The water level in the refueling cavity above the top of the reactor vessel flange is equal to or greater than 23 feet.

The requirement for the fuel storage building emergency ventilation system to be operable is established in accordance with standard testing requirements to assure that the system will function to reduce the offsite dose to within acceptable limits in the event of a fuel-handling accident. The system is actuated upon receipt of a signal from the area high activity alarm or by a manually-operated switch. The system is tested prior to fuel handling and is in a standby basis.

When fuel in the reactor is moved before the reactor has been subcritical for at least 365 hours, the limitations on the containment vent and purge system ensure that all radioactive material released from an irradiated fuel assembly will be filtered through the HEPA filters and charcoal adsorbers prior to discharge to the atmosphere.

The limit to have at least two means of decay heat removal operable ensures that a single failure of the operating RHR System will not result in a total loss of decay heat removal capability. With the reactor head removed and 23 feet of water above the vessel flange, a large heat sink is available for core cooling. Thus, in the event of a single component failure, adequate time is provided to initiate diverse methods to cool the core.

The minimum spent fuel pit boron concentration and the 90-day restriction of the movement of the spent fuel cask to allow the irradiated fuel to decay were specified in order to minimize the consequences of an unlikely sideways cask drop.

When the spent fuel cask is being placed in or removed from its position in the spent fuel pit, mechanical stops incorporated in the bridge rails make it impossible for the bridge of the crane to travel further north than a point directly over the spot reserved for the cask in the pit. Thus, it will be possible to handle the spent fuel cask with the 40-ton hook and to move new fuel to the new fuel elevator with a 5-ton hook, but it will be impossible to carry any object over the spent fuel storage area with either the 40 or 5-ton hook of the fuel storage building crane.

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NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
December 3, 1984

Section I - Description of the Change

This application seeks to supplement the changes previously proposed for Section 3.1 of Appendix A to the Operating License in the Authority's July 6, 1983 submittal regarding decay heat removal capability in response to the Commission's October 15, 1984 letter. The changes associated with Sections 3.3 and 3.8 of Appendix A to the Operating License are as previously proposed in the Authority's July 6, 1983 letter. The "Evaluation of the Change" encompasses the changes proposed for Section 3.1 as well as the changes previously proposed for Sections 3.3 and 3.8 of Appendix A to the Operating License.

Section II - Evaluation of the Change

The purpose of this change is to provide for sufficient decay heat removal capability by assuring that: 1) at least two decay heat removal paths are available when the reactor coolant system Tavg is below 350°F, 2) at least one reactor coolant pump or RHR pump (connected to the reactor coolant system) is operating when the reactor coolant system Tavg is below 350°F but not in the refueling operation condition, and 3) at least one reactor coolant pump is operating when the reactor coolant system Tavg is greater than 350°F.

When the reactor coolant system Tavg is less than 200°F, but not in the refueling operation condition, exception has been taken to providing two decay heat removal paths in the unlikely event that both RHR pumps are out of service due to maintenance, modifications, testing, inspection, or repair. This exception is acceptable due to the unlikely nature of this situation and since the proposed T/S would require an alternate means of decay heat removal to be available and that the system be returned to operable status within sufficient time to prevent cold shutdown requirements from being exceeded.

The Authority considers that this proposed change can be classified as not likely to involve significant hazards considerations since the proposed change "constitutes an additional limitation, restriction, or control not presently included in the technical specifications." (Example (ii), Federal Register, Vol. 48, No. 67 dated April 6, 1983, page 14870).

Section III - Impact of the Change

This change will <u>not</u> impact the following:

- ALARA Program
- Fire Protection Program
- Emergency Plan
- FSAR or SER Conclusions
- Overall Plant Operations

SECTION IV - Conclusion

The incorporation of these changes: a) will not increase the probability nor the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report; b) will not increase the possibility for an accident or malfunction of a different type than any evaluated previously in the Safety Analysis Report; c) will not reduce the margin of safety as defined in the basis for any Technical Specification; d) do not constitute an unreviewed safety question; and e) involves no significant hazards considerations as defined in 10CFR50.92.

SECTION V- References

(a) IP3 FSAR

(b) IP3 SER