ATTACHMENT I TO IPN-92-053

PROPOSED TECHNICAL SPECIFICATION CHANGES

RELATED TO

SURVEILLANCE REQUIREMENTS FOR MAIN STEAM AND STEAM GENERATOR BLOWDOWN SYSTEMS

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

TABLE 4.1-3 (Sheet 1 of 2)

FREQUENCIES FOR EQUIPMENT TESTS		
	Check	Frequency
1. Control Rods	Rod drop times of all control rods	24M
2. Control Rods	Movement of at least 10 steps in any one direction of all control rods	Every 31 days during reactor critical operations
3. Pressurizer Safety Valves	Set Point	18M
4. Main Steam Safety Valves	Set Point	24M
5. Containment Isolation System	Automatic actuation	18M
6. Refueling System Interlocks	Functioning	Each refueling, prior to movement of core components
7. Primary System Leakage	Evaluate	5 days/week
8. Diesel Generators Nos. 31, 32 & 33 Fuel Supply	Fuel Inventory	Weekly
9. Turbine Steam Stop Control Valves	Closure	Yearly
10. L.P. Steam Dump System (6 lines)	Closure	Monthly
11. Service Water System	Each pump starts and operates for 15 minutes (unless already operating)	Monthly
12. City Water Connections to Charging Pumps and Boric Acid Piping	Temporary connections available and valves operable	18M

Amendment No. 10, 14, 43, 83, 93, 99, 123, 126,

4.7 MAIN STEAM STOP VALVES

Applicability

Applies to periodic testing of the main steam stop valves.

Objective

To verify the ability of the main steam stop valves to close upon signal.

Specification

The main steam stop valves shall be tested at least once per 24 months. Closure time of five seconds or less shall be verified.

Basis

The main steam stop valves serve to limit an excessive Reactor Coolant System cooldown rate and resultant reactivity insertion following a main steam break incident.[1] Their ability to close upon signal should be verified at least once per 24 months. A closure time of five seconds was selected as being consistent with expected response time for instrumentation as detailed in the steam line break incident analysis.[2]

References

(1) FSAR - Section 10.5

(2) FSAR - Section 14.2.5

Amendment No. 123,

TABLE 3.1-1

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS				
INSTRUMENT	CHANNEL CHECK	SOURCE CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST
1. GROSS RADIOACTIVITY MONITORS PROVIDING ALARM AND AUTOMATIC TERMINATION OF RELEASE				
a. Liquid Radwaste Effluent Line	D*	D*	18M(3)	Q(1)*
b. Steam Generator Blowdown Effluent Line	D*	M*	18M(3)	Q(1)*
2. GROSS BETA OR GAMMA RADIOACTIVITY MONITORS PROVIDING ALARM BUT NOT PROVIDING AUTOMATIC TERMINATION OF RELEASE				
a. Service Water System Effluent Line	D*	M*	18M(3)	Q(2)*
3. FLOW RATE MEASUREMENT DEVICES				
a. Liquid Radwaste Effluent Line	D(4)	N.A.	18M	Q
b. Steam Generator Blowdown Effluent Line	D(4)	N.A.	24M	N.A.
4. RADIOACTIVITY RECORDERS				
a. Liquid Radwaste Effluent Line	D*	N.A.	18M	Q****
b. Steam Generator Blowdown Effluent Line	D*	N.A.	18M	Q****
5. TANK LEVEL INDICATING DEVICES***				
a. Refueling Water Storage Tank	D**	N.A.	18M	18M
b. Primary Water Storage Tank	D**	N.A.	18M	18M
c. Monitor Tank #31	D**	N.A.	18M	18M
d. Monitor Tank #32	D**	N.A.	18M	18M

TABLE NOTATIONS

* When this pathway is utilized for releases, with frequency no more than indicated.

** During liquid additions to the tank.

TABLE 3.1-1 *(Continued)*

*** Tanks included in this specification are those outdoor tanks that are not surrounded by liners, dikes, or walls capable of holding the tank contents and do not have tank overflows and surrounding area drains connected to the liquid radwaste treatment system.

**** Required only if alarm/trip setpoint is based on recorder-controller.

(1) The CHANNEL FUNCTIONAL TEST shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occur if the following condition exists:

1. Instrument indicates measured levels above the alarm/trip setpoint.

(2) The CHANNEL FUNCTIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:

1. Instrument indicates measured levels above the alarm setpoint.

2. Instrument controls not set in operate mode.

(3) Radioactive calibration standards used for channel calibrations shall be traceable to the National Bureau of Standards or an aliquot of calibration solution shall be analyzed with instrumentation which is calibrated with NBS traceable standards. (Standards from suppliers who participate in measurement assurance activities with NBS are acceptable).

(4) CHANNEL CHECK shall consist of verifying indication of flow during periods of release. CHANNEL CHECK shall be made at least once per 24 hours on days on which continuous, periodic, or batch releases are made.

D	Daily
M	Monthly
N.A.	Not Applicable
Q	Quarterly
18M	At least once per 18 months.
24M	At least once per 24 months.

TABLE 3.2-1

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS					
INSTRUMENT	CHANNEL CHECK	SOURCE CHECK	CHANNEL CALIBRATION	FUNC-TIONAL TEST	MODES IN WHICH SURVEIL-LANCE REQUIRED
1. WASTE GAS HOLDUP SYSTEM					
a. Noble Gas Activity Monitor-Providing Alarm	D	M	18M(2)	Q(1)***	*
2. WASTE GAS HOLDUP SYSTEM EXPLOSIVE GAS MONITORING SYSTEM					
a. Hydrogen Monitor	D	N.A.	M(3)	N.A.	**
b. Oxygen Monitor	D	N.A.	M(4)	N.A.	**
3. CONDENSER AIR EJECTOR					
a. Noble Gas Activity Monitor	D	M	18M(2)	Q(1)***	*
4. ENVIRONMENTAL RELEASE POINTS (PLANT VENT, ADMIN. BUILDING CONTROLLED AREA. VENT, RAD. MACHINE SHOP VENT)					
a. Noble Gas Activity Monitor	D	M	18M(2)	Q(1)***	*
b. Iodine Sampler	W	N.A.	N.A.	N.A.	*
c. Particulate Sampler	W	N.A.	N.A.	N.A.	*
d. Flow Rate Monitor	D	N.A.	18M	Q	*
e. Sampler Flow Rate Monitor	D	N.A.	18M	N.A.	*
5. CONTAINMENT PURGE SYSTEM					
a. Containment Noble Gas Activity Monitor - Providing Alarm and Automatic Termination of Release	D	M	18M(2)	Q(1)***	*

TABLE NOTATIONS

* Surveillance is required at all times except when monitor has been removed from service in accordance with Table 2.2-1.

TABLE 3.2-1 *(Continued)*

** During waste gas holdup system operation (treatment for primary system off gases).

*** Will not include operation of automatic control functions.

(1) The CHANNEL FUNCTIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:

1. Instrument indicates measured levels above the alarm setpoint.

2. Instrument controls not set in operate mode.

(2) Radioactive Calibration Standards used for channel calibrations shall be traceable to the National Bureau of Standards or an aliquot of calibration gas shall be analyzed with instrumentation which is calibrated with NBS traceable standards (standards from suppliers which participate in measurement assurance activities with NBS are acceptable).

(3) The CHANNEL CALIBRATION shall include the use of standard gas samples containing:

1. Less than or equal to two volume percent hydrogen,

and

2. Greater than or equal to four volume percent hydrogen,

(4) The CHANNEL CALIBRATION shall include the use of standard gas samples containing:

1. Less than or equal to one volume percent oxygen,

and

2. Greater than or equal to four volume percent oxygen.

D Daily
M Monthly
N.A. Not Applicable
Q Quarterly
18M At least once per 18 months

ATTACHMENT II TO IPN-92-053

SAFETY EVALUATION FOR

TECHNICAL SPECIFICATION CHANGES RELATED TO

SURVEILLANCE REQUIREMENTS FOR MAIN STEAM AND STEAM GENERATOR BLOWDOWN SYSTEMS

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

Section I - Description of Changes

This application for amendment to the Indian Point 3 (IP3) Technical Specifications proposes to change surveillance requirements for the Main Steam (MS) and Steam Generator Blowdown (SGBD) Systems to accommodate operation with a 24 month operating cycle.

Starting with cycle nine (August, 1992), Indian Point 3 began operating on 24 month cycles instead of the previous 18 month cycles. The specific MS and SGBD technical specifications affected by the change to a 24 month operating cycle and that are being changed by this application are:

- lift setpoint testing frequency of the Main Steam Safety Valves (MSSVs) (Table 4.1-3, Appendix A),
- closure time testing frequency of the Main Steam Stop (Isolation) Valves (MSIVs) (Section 4.7, Appendix A), and
- calibration frequency of the Steam Generator Blowdown (SGBD) flow instrumentation (Table 3.1-1, Appendix B).

Also included are

- deletion of the words "with the reactor at cold shutdown" from Specification 4.7 of Appendix A regarding testing of the MSIVs, and
- administrative changes to Tables 3.1-1 and 3.2-1 of Appendix B.

Section II - Evaluation of Changes

Starting with cycle nine (August, 1992), Indian Point 3 began operating on 24 month cycles instead of the previous 18 month cycles. To avoid either an 18 month surveillance outage or an extended mid-cycle outage, extension of the surveillance test intervals for the Main Steam System and the calibration interval for the Steam Generator Blowdown flow instrumentation are required. Generally, in evaluating the extension of surveillance test and calibration intervals to be consistent with the length of the operating cycle, the following factors are considered where applicable: the importance of the refueling test (i.e., does on-line testing demonstrate operability or are failures only being detected during the refueling tests?), past equipment performance and the effect on system safety functions, and the burden of performing tests during power operation. Below is an evaluation for each technical specification this application proposes to change.

The administrative changes to the Tables of Appendix B are being made to define all of the notations used on the tables and to clearly distinguish those surveillances that are currently being performed once per 18 months and those that will be changed to at least once per 24 months upon approval from the NRC. The frequency notation "R" on these tables is being changed to "18M" to identify those surveillance requirements to be performed at least once per 18 months. Those surveillances being requested to be performed at least once per 24 months are noted as "24M."

Testing of Main Steam Safety Valves

Five main steam safety valves (MSSVs) are installed on each steam line upstream of the main steam isolation valves (MSIVs) and protect the steam generator and main steam piping from overpressure conditions. The safety valves are set to open at successively greater pressures the further downstream the valve is located from the steam generators.

Table 4.1-3 of Appendix A to the IP3 Technical Specifications requires verification of MSSV lift setpoints every refueling outage. The test determines and records the pressure at which the valves lift. Adjustments are then performed as necessary. The test pressure at which the valve actuates is known as the "as-found" lift setting. After adjustment, the pressure at which the valve actuates (if within the acceptance criteria) is known as the "as-left" lift setting. The test requires that the reactor be in a hot shutdown condition with the steam header pressure greater than or equal to 925 psig. The test cannot be performed at power without resulting in undesirable plant transients.

Factors considered in evaluating the extension of the setting test interval include ANSI/ASME code requirements and valve performance. ANSI/ASME OM-1-1981, "Requirements for Inservice Performance Testing of Nuclear Power Plant Pressure Relief Devices," (Reference 3) requires that safety valves be set pressure tested at least once prior to initial operation and every subsequent 5 year period. At IP3, setpoint pressure testing is performed on all main steam safety valves on a refueling basis (previously defined as every 18 months). Extension of the testing interval to 24 months is still well within ANSI/ASME frequency requirements.

Evaluation of the lift test data from the past three operating cycles shows that the main steam safety valves have been performing well. Six (6) test data points (as-left lift setting, August, 1987; as-found and as-left lift settings, June, 1989; as-found and as-left lift settings, December, 1990; and as-found lift setting, July, 1992) for each of the twenty (20) valves provides three (3) drift data points for each valve. MSSV drift is defined as the difference between the as-found and as-left lift settings. Out of a total of sixty (60) valve drift values, only one exceeded the $\pm$ 3% acceptance criteria specified by ANSI/ASME OM-1-1981.

A review of operational occurrence reports (which include documentation of test failures) for the time period from mid-1985 through mid-1992 confirms that MSSV operability has not been a concern. The valves have not failed to open when required to.

Further, analysis of the lift test data shows that drift is not a function of time. The span of the test intervals (number of days between as-left and as-found test readings) for the three sets of drift data were 664, 545, and 591 days. Analysis of the drift data for each valve, whether drift occurred in the same direction or in opposite directions over the three intervals, shows no correlation between drift magnitude and the length of time between tests.

In summary, there is reasonable assurance that the MSSV setting test can safely be extended to accommodate the longer operating cycle because:

- the extended surveillance interval will remain well within ANSI/ASME OM-1-1981 test frequency requirements,

- test results have shown the safety valves to be reliable (only one of sixty test results failed to meet ANSI/ASME acceptance criteria),
- the valves have not failed to open when required to, and
- test results are not time dependent.

Finally, testing at power would result in undesirable plant transients.

Testing of Main Steam Stop Valves

An air-operated stop check valve (often referred to as a Main Steam Isolation Valve (MSIV)) is located in each of the four main steam headers outside of containment and downstream of the main steam safety valves and the atmospheric relief valve. These full-flow, swing check valves serve to isolate steam flow. In the normally open position, the valve disc is held open into the steam flow by air from the plant instrument air system. A four solenoid valve arrangement admits/vents air into/out of the valve's operating cylinder to open/close the valve. Air from the supply line acts on the bottom of the piston to raise the piston and open the valve. The air pressure must overcome the weight of the disc, the spring tension, and the steam flow to open the valve. Redundant vent valves bleed the air from the operating cylinder to allow valve closure. The valve is normally closed manually from a control room panel, but also shuts automatically on a steam line isolation signal.

Technical Specification 4.7 requires testing of the main steam stop valves at refueling intervals with the reactor at cold shutdown to verify that the valves close within five (5) seconds. The test procedure consists of stroking the MSIVs and recording their closure times. Testing of the MSIVs cannot be performed under normal steam flow conditions since stroking the valves above 10% power would cause a turbine trip and a subsequent reactor trip. Additionally, the valve's design will not allow the disc to reopen once it has been closed and differential pressure exists across the valve. Testing at normal steam flow conditions would necessitate bringing the plant to shutdown conditions after each valve test to equalize pressure across the valve.

Past performance of the valves was considered in evaluating the importance of the refueling (closure time) test, and the effect extension of the test would have on system safety functions. Valve performance is documented by operational occurrence reports, closure test data, and work requests.

A review of operational occurrence reports for the time period from mid-1985 through mid-1992 found four (4) entries relating to MSIVs. The occurrences involved 1) an inoperable vent valve, requiring an operator to manually close the SOV isolation valve to prevent the MSIV from closing; 2) failure of a MSIV to close upon a signal from the control room panel (control circuit failure), requiring an operator to locally isolate the air supply in order to close the valve; 3) mechanical binding of a MSIV in an open position, requiring an operator to manually close the valve; and 4) an air leak from a MSIV air operator, requiring plant shutdown to fix the leak.

Two of the four occurrences (numbers 1 and 4) were discovered during power operation, and were, thus, not dependent on testing frequency. The other two occurrences were detected during shutdown. Since establishing plant shutdown requires closure of the MSIVs, MSIV operability (i.e. ability to close) is effectively verified each shutdown whether or not the surveillance test is performed. The mechanically bound open MSIV (occurrence number 3 above) was detected

during a scheduled surveillance test, but would have been detected while establishing plant shutdown whether or not surveillance testing was to be performed.

Additionally, for all of the occurrences, with the exception of the air leak from the air operator, manual closure of valves accomplished the desired result. None of the occurrences, with the exception of the mechanically bound open MSIV, involved potential failure of a MSIV to perform its intended safety function. The root cause for mechanical binding of the MSIV was determined to be related to incorrect packing of the valve. As a result of this event (reported by Reference 4), all four MSIV valve actuators were replaced with stock components, and all four packing assemblies were repacked per manufacturer recommendations. Subsequent testing of the MSIVs demonstrated acceptable closure times.

A review of the MSIV closure test data from May, 1986 through July, 1992 shows that only one valve failed testing criteria. The failure involved the mechanically bound open MSIV already mentioned above. Additionally, the test data does not show any correlation between valve closure time and the number of days between tests.

A review of MSIV work requests found most entries, other than those associated with the occurrences already discussed above, relating to preventive maintenance or modifications. Thus, the occurrence reports, closure test data and work requests all show reliable MSIV operation.

In summary, there is reasonable assurance that the MSIV closure test can safely be extended to accommodate the longer operating cycle because:

- test results have shown the isolation valves to be reliable (only one valve failed testing criteria),
- valve operability is effectively verified during each shutdown, and
- test results are not time dependent.

Also, testing of the main steam stop (isolation) valves at power would result in undesirable plant transients.

In addition to the interval change for this specification, it is proposed that the words "with the reactor at cold shutdown" be deleted. The resulting specification is consistent with the Westinghouse Standard Technical Specifications (W STS) which does not specify plant conditions for MSIV testing. The proposed change will allow testing at hot shutdown to satisfy the technical specification requirement.

Calibration of Steam Generator Blowdown (SGBD) Flow Instrumentation

The steam generator blowdown (SGBD) system provides a continuous blowdown of the steam generators to maintain chemistry within specifications which limit the accumulation of solid contaminants and corrosion products. Blowdown flow is also used to calculate radiological releases and the secondary side heat balance. The blowdown flow instrumentation provides flow measurement and indication of steam generator blowdown from each steam generator.

Table 3.1-1 of Appendix B to the IP3 Technical Specifications requires calibration of the SGBD flow instrumentation every refueling outage. During the past refueling outage, new flow

instrumentation was installed to provide for better steam generator chemistry control.

The new flow instrumentation consists of a venturi, high and low range differential pressure (dP) flow transmitters, RTDs (temperature elements), flow indicating controllers and flow computing totalizer units. Each blowdown line contains a venturi with one tap for the high range and one tap for the low range dP flow transmitter, and one RTD downstream of the venturi. For each blowdown line, the two transmitters interface with one flow controller. Flow totalizer inputs from the flow controller and RTD for each blowdown line are used to calculate and display a true flow, in gallons per minute (gpm) for the line. The totalizers interface with existing flow indication recorders and the high flow alarm on the SGBD panel.

Since new blowdown flow instrumentation has been installed, analysis of past calibration data is irrelevant in evaluating the extension of the calibration interval. The predicted calibration drifts for the new flow instruments were calculated for a maximum 30 month calibration interval. The variables included in the calculations were vendor drift allowance and instrument accuracy. The resulting calculations show predicted calibration drifts for the new instrumentation to be within the calibration tolerances required.

Additionally, the IP3 Environmental Technical Specifications (Item 3 of Table 2.1-1, Appendix B) allows blowdown flowrate to be estimated when the instruments are inoperable. Operation of the blowdown flow instrumentation is not required by emergency operating procedures or to mitigate the consequences of an accident.

In summary, there is a reasonable assurance that the calibration frequency of the steam generator blowdown flow instrumentation can safely be extended to accommodate the longer operating cycle because:

- the blowdown flow instruments are new;
- predicted drifts, based on vendor data, over a maximum 30 month calibration interval for the new instrumentation are well within the calibration tolerances required, and within the uncertainty tolerances required to assess radioactive releases;
- operation of the SGBD flow instrumentation is not required by technical specifications provided that blowdown flow can be estimated by other means at least every four (4) hours during actual releases (Table 2.1-1, Appendix B); and
- operation of the blowdown flow instrumentation is not required by emergency operating procedures or to mitigate the consequences of an accident.

Section III - No Significant Hazards Evaluation

Consistent with the requirements of 10 CFR 50.92, the enclosed application is judged to involve no significant hazards based on the following information:

(1) Does the proposed license amendment involve a significant increase in the probability or consequences of any accident previously evaluated?

Response:

The administrative changes to Tables 3.1-1 and 3.2-1 of Appendix B to the

Technical Specifications will avoid confusion between existing surveillance intervals and those surveillance intervals that receive approval to be extended to at least once per 24 months, and clarify the meaning of all of the notations used on the tables. These changes do not involve a significant increase in the probability or consequences of any accident previously evaluated.

The other changes propose deleting the words "with the reactor at cold shutdown" from the main steam isolation valve (MSIV) testing requirements, extending the surveillance test intervals for the MSIVs and the main steam safety valves (MSSVs), and extending the calibration interval for the steam generator blowdown (SGBD) flow instrumentation to be consistent with the length of the operating cycle (24 months).

Deleting the cold shutdown requirement for the MSIV surveillance test is consistent with the Westinghouse Standard Technical Specifications (W STS) which does not specify plant conditions for MSIV testing. The proposed change will allow testing at hot shutdown to satisfy the technical specification requirement. Since this proposed change does not involve changes in equipment/system functions and does not adversely affect system operability, the proposed change does not involve a significant increase in the probability or consequences of any accident previously evaluated.

The Main Steam System is required to operate to mitigate the consequences of the following accidents:

- Steam Line Break,
- Steam Generator Tube Rupture,
- Loss of Normal Feedwater, and
- Loss of External Electrical Load.

Since extending the surveillance test intervals for the MSSVs and the MSIVs does not involve changes in equipment/system functions and does not adversely affect main steam system operability, the changes do not alter the assumptions nor conclusions presented in the accident analyses which form the current licensing basis documented in the plant's FSAR, and, therefore, do not involve a significant increase in the consequences of any accident previously evaluated.

Additionally, since test results are not time dependent, the proposed longer testing intervals do not involve a significant increase in the probability of any accident previously evaluated.

Since the SGBD flow instrumentation is not required by emergency operating procedures and does not mitigate the consequences of any accidents, extension of the calibration interval for the SGBD flow instrumentation does not involve a significant increase in the probability or consequences of any accident previously evaluated.

(2) Does the proposed license amendment create the possibility of a new or different kind of accident from any previously evaluated?

Response:

The administrative changes to Tables 3.1-1 and 3.2-1 of Appendix B to the Technical Specifications will avoid confusion between existing surveillance intervals and those surveillance intervals that receive approval to be extended to at least once per 24 months, and clarify the meaning of all of the notations used on the tables. These changes will not create the possibility of a new or different kind of accident from any previously evaluated.

The other changes propose deleting the words "with the reactor at cold shutdown" from the main steam isolation valve (MSIV) testing requirements, extending the surveillance test intervals for the MSIVs and the main steam safety valves (MSSVs), and extending the calibration interval for the steam generator blowdown (SGBD) flow instrumentation to be consistent with the length of the operating cycle (24 months). Since these proposed changes do not involve changes in equipment/system functions and do not adversely affect system operability, the proposed changes do not create the possibility of a new or different kind of accident from any previously analyzed.

(3) Does the proposed amendment involve a significant reduction in a margin of safety?

Response:

The administrative changes to Tables 3.1-1 and 3.2-1 of Appendix B to the Technical Specifications will avoid confusion between existing surveillance intervals and those surveillance intervals that receive approval to be extended to at least once per 24 months, and clarify the meaning of all of the notations used on the tables. These changes do not involve a significant reduction in a margin of safety.

The other changes propose deleting the words "with the reactor at cold shutdown" from the main steam isolation valve (MSIV) testing requirements, extending the surveillance test intervals for the MSIVs and the main steam safety valves (MSSVs), and extending the calibration interval for the steam generator blowdown (SGBD) flow instrumentation to be consistent with the length of the operating cycle (24 months).

The change to delete the words "with the reactor at cold shutdown" results in a specification consistent with the Westinghouse Standard Technical Specifications. No reduction in a margin of safety is involved.

The proposed changes to extend the surveillance test intervals for the MSSVs and the MSIVs do not involve changes to established setpoints. The extended main steam safety valve lift setpoint testing interval remains well within ANSI/ASME OM-1-1981 code requirements. Performance data has shown the MSSVs and MSIVs

to be reliable, and test results are not time dependent. MSIV operability is effectively verified during each shutdown.

The steam generator blowdown system is not required by emergency operating procedures or to mitigate the consequences of an accident. Also, predicted calibration drifts for the new instrumentation are well within the calibration tolerances required, and the uncertainty tolerances required to assess radioactive releases. Thus, extension of the SGBD flow instrumentation calibration frequency does not reduce margins of safety.

Section IV - Impact of Changes

These changes will not adversely impact the following:

ALARA Program
Security and Fire Protection Programs
Emergency Plan
FSAR and SER Conclusions
Overall Plant Operations and the Environment

Section V - Conclusions

The incorporation of this change: 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 bases for any technical specification; d) does not constitute an unreviewed safety question; and e) involves no significant hazards considerations as defined in 10 CFR 50.92.

Section VI - References

1) IP3 SER
2) IP3 FSAR
3) ANSI/ASME OM-1-1981, "Requirements for Inservice Performance Testing of Nuclear Power Plant Pressure Relief Devices."
4) Licensee Event Reports LER 89-002-00 and 89-002-01, "Main Steam Isolation Valve Fails to Close, Event date of February 2, 1989.
5) Westinghouse Standard Technical Specifications.