1. Operation of IP-2 in accordance with these changes would not involve a significant increase in the probability or consequences of an accident previously evaluated.

   The proposed technical specification test requirement is currently required by the February 11, 1980 Confirmatory Order Item A.5. This proposed amendment merely transfers the test requirement from the Confirmatory Order to the IP-2 Technical Specifications. Moreover, the consequences of doing or not doing this testing have been previously reviewed by NRC in various submittals; namely our March 14, 1980 response to NRC's February 25, 1980 Generic Letter "LWR Primary Coolant System Pressure Isolation Valves," and NRC's Confirmatory Order dated February 11, 1980 and subsequent Commission rescission of that Order dated July 5, 1985. By committing to test the SIS low head injection line check valves 897A-D and the RHR check valves 838A-D whenever RCS pressure has decreased to within 100 psig of the RHR system design pressure, the probability of coincident disc rupture of the two series check valves, as analyzed in the Indian Point Probabilistic Safety Study (IPPSS), is reduced to approximately 2.9×10^{-7} /reactor year from 4.4×10^{-6}/reactor year. The latter value is based on IPPSS methodology using five year average failure rates to represent the "no testing" case, which is consistent with WASH-1400. Since IP-2 has a normally closed motor-operated valve in the injection flow path in addition to the two series check valves, the probability of an intersystem loss-of-coolant accident (Event V) via this path, as analyzed in the IPPSS, is further reduced to approximately 2.6×10^{-9}/reactor year. All failure rates quoted above are mean valves.

2. Operation of IP-2 in accordance with these changes would not create the possibility of a new or different kind of accident from any accident previously evaluated.

   The proposed Technical Specification test requirement is currently required by NRC's February 11, 1980 Confirmatory Order, Item A.5, and is required to address the intersystem loss-of-coolant accident (Event V) identified in the WASH-1400. By transferring the requirement to perform the particular test from the Order Item A.5 to the Technical Specifications, a new or different kind of accident from that previously evaluated cannot be created.

3. Operation of IP-2 in accordance with these changes would not involve a significant reduction in a margin of safety.

   The proposed Technical Specification test requirement, which is currently required by the February 11, 1980 Confirmatory Order Item A.5, does not reduce nor change the margin of safety from that existing now. The proposed amendment only transfers the requirement to perform the particular test from the Order Item A.5 to the Technical Specifications. It has previously been demonstrated that by performing the test the margin of safety increases.

The Commission has provided guidance concerning the application of the standards for determining whether "significant hazards considerations" exist by providing certain examples at 48 FR 14870 (April 6, 1983; Interim Final Rule) and at 51 FR 7744 (March 6, 1986; Final Rule).