

ATTACHMENT I

The annual report required by 10 CFR 50.59(b)(2)

Note: For each item listed in the Attachment, the evaluation found that no unreviewed safety questions were created.

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1996 ANNUAL REPORT

NSE 80-3-045 HV, REV. 0

CCR VENTILATION SYSTEM OPERABILITY

Description and Purpose

This NSE was written to verify the CCR ventilation system flow rates and to ensure that the filters were performing their intended function. The system was tested to determine the air flow and pressure drop through the HEPA and charcoal filters. It was determined that the flow rates was in excess of the design criteria. The charcoal filters were replaced with a more efficient type of charcoal filter, the dampers were then repositioned to provide a higher incident air flow within the capabilities of the filters. The flow rate was retested and found to be within the design criteria of 1035 cfm.

Summary of Safety Evaluation

This modification restored the CCR system flow rates to be within the original design basis conditions.

1996 ANNUAL REPORT

NSE 84-3-108 MULT, REV. 1

MODIFICATION OF UNFINISHED ROOM BELOW
THE ELECTRICAL TUNNEL

Description and Purpose

This modification completed work on an unfinished room below the Electrical Tunnel. This room provides an area for the Steam Generator Blowdown Recovery System. The work included the installation of a floor slab, and repair of drains to eliminate the possibility of contamination or water from the PAB draining into the storm drain located in the transformer yard.

Summary of Safety Evaluation

This modification does not affect the operation of any plant systems or components.

1996 ANNUAL REPORT

NSE 94-3-311 480V, REV. 0

REPLACEMENT OF DAMAGED QA CATEGORY I CABLES
IN SERVICE WATER PUMP FEEDER DUCTBANK

Description and Purpose

This temporary modification replaced damaged sections of 480 volt buried cable that feed service water system pumps and strainers. This work was associated with the repair of the service water pump feeder ductbank which was done under DC 94-3-269.

Summary of Safety Evaluation

This modification restored the service water system cables to the equivalent of the original design basis conditions. No additional loads or changes in loads were added and all cable was installed in the existing conduit maintaining electrical separation.

1996 ANNUAL REPORT

CLS 94-3-372 IA, REV. 1

NEW INSTRUMENT AIR SUPPLY LINE FROM IA-834 TO IA
COMPRESSOR UNLOADER SOV'S (SOV-1198 AND SOV-1199)

Description and Purpose

This classification categorized the components that were added to the Instrument Air System per MMP 94-3-372 IA, Rev. 0 (reported on in the 1995 Annual Report). That modification provided separate instrument air lines to the pressure switches and SOVs for the 31 and 32 Instrument Air Compressors. The only change made by this revision was to correct typographical errors on the cover page.

Summary of Safety Evaluation

The changes made in this revision are administrative in nature.

1996 ANNUAL REPORT

NSE 95-3-148 SI, REV. 0

EVALUATION OF REVISION 9 TO EOP ES-1.4

Description and Purpose

This evaluation justified the revision to Emergency Operating Procedure (EOP), ES-1.4, "Transfer To Hot Leg Recirculation", to add a step to open valve SI-898 prior to initiating the transfer to hot leg recirculation. This change resolves an accessibility concern noted in Deviation Event Report 95-825. This change will pre-position SI-898 while the SI pump room is still accessible, so that the design function of this alternate flowpath is preserved.

Summary of Safety Evaluation

This evaluation addressed the safety aspects of this change, and justified that this change is consistent with the SI system design basis.

1996 ANNUAL REPORT

NSE 95-3-316 WCCPP, REV. 1

PENETRATION TEST FOR WATER LEAKAGE

Description and Purpose

This NSE was written in support of revision 1 of Operations Procedure 3PT-W16, "Penetration Test for Water Leakage", to verify containment penetration SS was free of water leakage. Revision 0 of this NSE was included in the previous Annual Report (1995). This NSE revision added the statement that, "Section 6.6 of the FSAR was revised to describe the opening of the flow through test valves for use in sampling containment penetration and WCCPPS atmosphere".

Summary of Safety Evaluation

The change made to Revision 1 of this NSE is administrative.

1996 ANNUAL REPORT

NSE 95-3-354 PW, REV. O

FSAR UPDATE FOR PW PUMP OPERATION CHANGES

Description and Purpose

This NSE supported the upgrade of procedure SOP-PW-1. It evaluated the acceptability of operating with one of the Primary Water Pump control switches in the Pull-Out position (while the other pump is running) during all plant operating modes. The reason for this is to electrically isolate the pump control logic, and prevent the other PW pump from automatically starting.

Summary of Safety Evaluation

Changing the number of PW Pumps capable of automatically operating as described in SOP-PW-1 reduces the number of PW Pumps that can be started on a Reactor Makeup Control signal and minimizes the potential for a Boron Dilution Event. No new accident scenarios are created by changing the control switch position of the second pump.

1996 ANNUAL REPORT

NSE 96-3-020 FEW, REV. 0

EVALUATION OF REVISION TO FSAR FIGURE 9.6-9A

Description and Purpose

This NSE evaluated a discrepancy between the type of valves in the field compared to valves shown in FSAR Figure 9.6-9A. FSAR Figure 9.6-9A shows that FP-47 and FP-429 are globe valves while the field installed valves are gate valves.

Summary of Safety Evaluation

FSAR Figure 9.6-9A has been revised to reflect field configuration. The Fire Protection System continues to operate as intended.

1996 ANNUAL REPORT

NSE 96-3-023 MULT, REV. 0 AND REV. 1

CORPORATE ORGANIZATIONAL RESTRUCTURING -
SAFETY REVIEW COMMITTEE/SPEAKOUT REASSIGNMENT

Description and Purpose

This NSE evaluated the transfer of responsibility of the Speakout Program from the Quality Assurance Manager - WPO to the Director of Security, and the transfer of responsibility of the SRC Chairmanship from the Director of Independent Oversight to the Director of Regulatory Affairs and Special Projects.

Summary of Safety Evaluation

These organizational changes do not affect the function of either Speakout or the SRC programs, are administrative in nature, and do not involve plant equipment or operating conditions.

1996 ANNUAL REPORT

NSE 96-3-030 FP, REV. 0

IP3 SITE FIRE PROTECTION

Description and Purpose

This NSE evaluated changes to Administrative Procedure 27.3, IP3 Site Fire Protection. The changes included the elimination of the position of Manager - Safety and Fire Protection in the White Plains Office Appraisal and Compliance Services Department. The responsibilities for that position have been transferred to the Director - Safety Oversight/Appraisal and Quality Assurance Hydro/Fossil. This NSE also created the position, Manager - Fire Protection. This position reports to the Director Nuclear Engineering and was created to provide oversight for the Fire Protection, Appendix R activities, and to facilitate lessons learned between JAF and IP3. In addition, this NSE included the incorporation of the Fire Protection Program Plan into AP-27.3.

This NSE supplements NSE 96-3-003, IP3 Site organizational changes, which was included in the 1995 Annual Report.

Summary of Safety Evaluation

The changes described in this safety evaluation are administrative in nature and do not involve plant equipment, structures, systems or components. Organization functions and position responsibilities continue to be performed although not necessarily by the same department, position or title.

1996 ANNUAL REPORT

NSE 96-3-033 SWS, REV. 0, REV. 1, REV. 2 & REV. 3

POWER OPERATION WITH SERVICE WATER
TEMPERATURE <35°F

Description and Purpose

This NSE identified the concerns associated with operating the plant with Service Water temperature at 28°F. This issue resulted from the Haddam Neck plant that had lower ultimate heat sink temperatures than the minimum designated by the FSAR. Although IP3's FSAR does not identify a minimum temperature for the Service Water System (SWS), the Accident Analysis Basis Document listed temperature (35°F) is greater than what has been historically measured in the field (~30°F).

Summary of Safety Evaluation

There are two mitigating factors that individually and in combination, eliminate any concerns that there could be a lower minimum containment pressure associated with power operation with low SWS temperature:

1. Containment cooling is based on a very conservative Fan Cooler Unit (FCU) heat removal capacity, which is not based on any specific SWS temperature; and
2. There is currently a margin of over 200°F between maximum design basis peak clad temperature of 1976°F and the licensing analytical limit of 2200°F.

The effect of lowered river water temperature on other components and fluids used by the SWS was evaluated and found acceptable.

Thus, power operation with a reduced SWS temperature does not increase the probability of occurrence or consequence of an accident previously evaluated in the safety analysis report.

1996 ANNUAL REPORT

NSE 96-3-035 RWD, REV. 0

FSAR UPDATE FOR WASTE GAS SYSTEM

Description and Purpose

This NSE addressed the acceptability of venting the Reactor Coolant Drain Tank (RCDT) to the waste gas vent header in all modes of operation, in lieu of venting via the eductor vent system for the PRT. This change was part of an upgrade to procedure SOP-WDS-1.

This NSE also addressed raising the maximum pressure in the waste gas vent header from 2 psig to 4 psig (to allow operational flexibility of the waste gas system), in addition to clarifying the allowable operating modes for the waste gas compressor. These issues resulted from the upgrade to procedure SOP-WDS-2.

Summary of Safety Evaluation

Allowing venting to the waste gas vent header is consistent with the original system design and with the FSAR, therefore, this change is not safety significant.

The normal design pressure of the system and its associated connected components are designed to a much higher pressure as compared to the maximum allowable for the vent header, therefore raising the vent header pressure from 2 to 4 psig has no adverse impact.

1996 ANNUAL REPORT

NSE 96-3-041 COND, REV. 0

EVALUATION OF THE USE OF MECHANICAL SEALS ON
CONDENSATE PUMPS

Description and Purpose

This NSE justified substituting a mechanical seal in the Condensate Pumps in lieu of a conventional packed stuffing box. This substitution was necessary based on the pumps history, air inleakage and shaft leakage.

Summary of Safety Evaluation

The installation of the mechanical seals in the Condensate Pumps is an improvement that will reduce the maintenance and operational concerns encountered with the packed box. The new seals perform the same function as the standard packed box.

1996 ANNUAL REPORT

NSE 96-3-064 MULT, REV. 3, REV. 2, REV. 1, REV. 0

REORGANIZATION OF MANAGEMENT STRUCTURE
WITHIN NUCLEAR GENERATION

Description and Purpose

This evaluation ensured that no unreviewed safety question exists in re-organizing the New York Power Authority Management structure within the Nuclear Generation Department. These changes involve title changes, the creation and deletion of positions, and the reassignment of position responsibilities and reporting relationships.

Summary of Safety Evaluation

These changes are administrative in nature and do not involve plant equipment or operating conditions. Organizational criteria for responsibilities are maintained.

1996 ANNUAL REPORT

NSE 96-3-072 WCCPP, REV. 1

INSTALLATION OF INLINE FILTERS FOR
PS-PCV-1194, 1196, 1198 AND 1200

Description and Purpose

This NSE documented the addition of in-line filters for each of the four individual Weld Channel and Containment Penetration Pressurization (WCCPP) zones upstream of pressure regulating valves PS-PCV-1194, 1196, 1198 and 1200.

Summary of Safety Evaluation

The installation of the in-line filters improves the operation of the system by preventing particulate obstruction of the pressure regulating valves, and does not change the overall function or intent of the WCCPP system.

1996 ANNUAL REPORT

NSE 96-3-083 PZR, REV. 1

EVALUATION OF USE OF
BACKUP PRESSURIZER HEATERS

Description and Purpose

This safety evaluation analyzed the impact of operating the Pressurizer Pressure Control System with as many as three backup heater banks manually turned on, and the pressurizer sprays operating in an automatic mode to maintain pressure constant. This mode of operation has become necessary due to heat loss and small continuous pressurizer spray from the Pressurizer requiring additional heater capacity for compensation.

Summary of Safety Evaluation

The operation of up to three sets of pressurizer backup heaters does not result in any original design specifications, such as seismic requirements, electrical separation requirements or environmental qualification being altered. All LOCA and non-LOCA safety analysis acceptance criteria continue to be met with the operation of up to three pressurizer backup heaters.

1996 ANNUAL REPORT

NSE 96-3-100 MULT, REV. 0

FSAR REVISION TO CLARIFY ACCIDENT ANALYSIS
DESIGN ASSUMPTIONS

Description and Purpose

This NSE corrected statements in the FSAR that were inconsistent with the design basis accident analysis. FSAR section 14.3 previously stated:

In the Small Break LOCA analysis, flow from a single motor driven auxiliary feedwater pump is assumed to begin 90 seconds after accident initiation.

The last part of the sentence was changed to read:

...is assumed to begin no later than 90 seconds after the safety injection signal is initiated.

FSAR section 14.3.4 changed the minimum RWST temperature from 40°F to 35°F and added a footnote to Table 14.3.3.2 giving a 10°F margin on RWST temperature to bring the FSAR up to date with the most current Westinghouse accident analysis.

Summary of Safety Evaluation

The changes made in this NSE are minor adjustments that make the FSAR consistent with the accident analysis and do not change its intent.

1996 ANNUAL REPORT

NSE 96-3-083 PZR, REV. 1

EVALUATION OF USE OF
BACKUP PRESSURIZER HEATERS

Description and Purpose

This safety evaluation analyzed the impact of operating the Pressurizer Pressure Control System with as many as three backup heater banks manually turned on, and the pressurizer sprays operating in an automatic mode to maintain pressure constant. This mode of operation has become necessary due to heat loss and small continuous pressurizer spray from the Pressurizer requiring additional heater capacity for compensation.

Summary of Safety Evaluation

The operation of up to three sets of pressurizer backup heaters does not result in any original design specifications, such as seismic requirements, electrical separation requirements or environmental qualification being altered. All LOCA and non-LOCA safety analysis acceptance criteria continue to be met with the operation of up to three pressurizer backup heaters. Effects of this change on normal operational transients were evaluated and determined to be acceptable for this mode of operation.

1996 ANNUAL REPORT

NSE 96-3-133 SFP, REV. 0

EVALUATION OF REVISION TO FSAR SECTION 9.3 SPENT
FUEL POOL DEMINERALIZER RESIN VOLUME

Description and Purpose

This NSE justified changing the resin volume in the Spent Fuel Pit Demineralizer from 30ft³ to a range of 15 to 25ft³ to lessen the tendency of the resin to compact.

Summary of Safety Evaluation

Reducing resin volume lessens the tendency of the resin to compact and facilitates its removal. There are no accident mitigating functions associated with the SFP Demineralizer. Therefore, changing resin volume has no safety significance.

1996 ANNUAL REPORT

NSE 96-3-157 CPRTR, REV. 0

CONDENSATE POLISHER VESSEL PURGE
RINSE CONDENSER ISOLATION VALVE POSITION

Description and Purpose

This NSE added step 4.6 to procedure SOP-WTCP-1 which provides the option of directing condensate polisher rinse water to the Main Condensers or to the Total Dissolved Solids sump depending on the conductivity of the water. Step 4.6 assures that the draining and isolation for the purge rinse line is performed once the rinsing process is complete. This step also calls for returning the valves to the normally closed position on completion of the rinsing process in accordance with COL-C-1.

Summary of Safety Evaluation

Changing valve positions during purge rinse cycles does not impact safety. These valves are not credited in any accident analyses as described in the FSAR nor do they interface with any equipment considered important to safety.

1996 ANNUAL REPORT

NSE 96-3-163 RWD, REV. 0

SPENT RESIN TRANSFER TO THE CONTAINMENT
ACCESS FACILITY ANNEX BUILDING TRUCK BAY

Description and Purpose

This NSE justified allowing spent resin transfer to be performed in the Containment Access Facility (CAF) annex building truck bay instead of the Fuel Storage Building (FSB). This was addressed in RE-RWM-12-35, Rev. 6 (Spent Resin Transfer). Prior to this revision, spent resin was transferred from the Spent Resin Storage Tank in the PAB to a waste disposal liner then to a shipping container located in the truck bay of the FSB. The old method required the use of temporary outdoor transfer lines, and extra precautions were necessary to prevent releases to the environment.

Summary of Safety Evaluation

This revision does not change the function of the Waste Disposal system or create any scenarios different than those previously evaluated in the Final Safety Analysis Report. Utilization of the annex building eliminates the need for routing spent resin outside the buildings, eliminates a lengthy resin transfer line and limits the potential for a radiological release to the environment.

1996 ANNUAL REPORT

NSE 96-3-175 FP, REV. 0

IP3 FIRE PROTECTION PROGRAM

Description and Purpose

This NSE evaluated changes made to AP-27.3, ("IP3 Site Fire Protection") to identify it as the document that describes the method of compliance and provides an explanation of the organization, responsibilities, and administrative controls which comprise the Fire Protection Program for IP3. This change to AP-27.3 also identifies the fundamental documents which support the Fire Protection Program, and require that changes to these documents are processed under the 10CFR50.59 process.

Summary of Safety Evaluation

These changes eliminated duplicate information from being in both the Fire Protection Reference Manual and in the source documents of the FPRM.

1996 ANNUAL REPORT

NSE 96-3-186 CCW, REV. 0

EVALUATION OF CHANGING THE CHLORIDE LIMIT
IN THE COMPONENT COOLING WATER SYSTEM

Description and Purpose

This evaluation justified changing the chloride specification listed in the Final Safety Analysis Report from 0.15ppm to 150 ppm. This change is acceptable based on the use of a Molybdenum nitrate triazole compound, which has the capability of minimizing corrosion in systems with chloride and sulfate levels as high as 250 ppm. This evaluation also amended the description of the corrosion inhibitor used in the Component cooling water system (CCW) to eliminate information that is subject to change such as vendor name and product number.

Summary of Safety Evaluation

A limit of 150ppm chlorides provides sufficient margin to initiate corrective actions prior to possible detrimental effects of chloride induced stress corrosion cracking. The Molybdenum compound used can minimize corrosion in systems with chloride levels as high as 250ppm. The description change provides the necessary requirements and eliminates possible conflicts caused by product name and number changes.

1996 ANNUAL REPORT

NSE 96-3-187 CP, REV. 0

EVALUATION OF REVISION TO FSAR SECTION 10.2.6
CONDENSATE POLISHING SYSTEM (CPS)

Description and Purpose

This NSE revised sections of the FSAR pertaining to the Condensate Polishing System to correct and clarify sections that are inconsistent with current operating and monitoring practices. These revisions included:

Clarification where Radiation Monitoring is performed in the system, identified the current practice of bypassing some of the condensate around the polisher service vessels, condensate post filters, and operating some of the service vessels without ion exchange resin, providing justification for removing instrumentation from the FSAR description and drawings that are no longer used or needed, and updated the influent and effluent quality parameters to reflect current chemistry operation.

Summary of Safety Evaluation

The corrections and clarifications make the FSAR consistent with the current operating and monitoring of the Condensate Polishing System and since this system serves no safety function these changes are not safety significant.

1996 ANNUAL REPORT

NSE 96-3-219 SWS, REV. 0

ELIMINATION OF TRANSFER OF CCR AC TO THE
NON-ESSENTIAL SERVICE WATER HEADER DURING
POST-LOCA RECIRCULATION

Description and Purpose

This NSE changed the requirement of transferring one CCR AC unit from the essential to the non-essential service water header during Post-LoCa recirculation phase allowing both CCR AC units to remain aligned to the essential service water header.

Summary of Safety Evaluation

Maintaining this alignment of both CCR AC units does not affect the operation of the service water system and does not cause any new accident scenarios.

1996 ANNUAL REPORT

NSE 96-3-223 FP, REV. 0

CHANGE IN FIRE BRIGADE LEADER

Description and Purpose

This safety evaluation justified changing the responsibility of Fire Brigade Leader from the Balance of Plant Operator to the Field Support Supervisor. This change is a result of an INPO finding that states "Assignment of Control Room Reactor Operators to perform duties of Fire Brigade Leader has the potential to adversely affect the crew's response to operating events concurrent with a fire."

Summary of Safety Evaluation

This NSE resolves the INPO finding by reassigning the duties of Fire Brigade Leader from a Control Room Reactor Operator to the Field Support Supervisor, who is not assigned to the Control Room. This change does not reduce the effectiveness of the position of Fire Brigade Leader.

1996 ANNUAL REPORT

NSE 96-3-224 AFW, REV. 0

AUXILIARY FEEDWATER SYSTEM
PURGE VOLUME EFFECTS

Description and Purpose

This NSE demonstrates that the discrepancy between the analyzed value of the Auxiliary Feedwater System Purge volume and the purge volume, as calculated from piping drawings, has no impact on plant operations for the remainder of Cycle 9 provided that Condensate Storage Tank temperature (CST) does not exceed 100°F. There is no numerical value for purge volume in the FSAR or in the Technical Specifications. However, the analyses justifying the higher purge volume required changing assumptions for maximum allowable tube plugging levels and maximum allowable CST temperature. FSAR section 14.1.9 has been revised to refer to a uniform 5% steam generator tube plugging level rather than 30% with a notation that this is valid only for cycle 9. In addition, all references in the FSAR to CST temperature have been revised to be limited to 100°F for the remainder of Cycle 9.

Summary of Safety Evaluation

The changes made to the FSAR provide more detailed information on the effects of a Loss of Normal Feedwater and do not create any new scenarios as a result.

1996 ANNUAL REPORT

NSE 96-3-274 RM, REV. 0, REV. 1 AND REV. 2

OVER-RIDING SPURIOUS
TURBINE RUNBACK ACTUATIONS

Description and Purpose

This NSE evaluated over-riding the rod stop and turbine runback signals from one of four channels of the Overtemperature and Overpower ΔT Instrument Loops, and the Power Range Nuclear Instrument Dropped Rod Circuits during activities that have the potential to adversely impact an instrument bus (such as opening or closing an instrument bus circuit breaker, or changing fuses, on an energized instrument bus circuit).

Summary of Safety Evaluation

Over-riding the rod stop and turbine runback signals from one channel is presently permitted by the safety analysis for surveillance testing, and is equivalent to over-riding the signals during activities that have the potential to adversely impact an instrument bus.

1996 ANNUAL REPORT

NSE 96-3-284 ADMIN, REV. 0

CORPORATE RESTRUCTURING

Description and Purpose

The position Director of Special Projects and Industry Affairs, which had the responsibility for Corporate Emergency Planning and industry group coordination and radioactive waste management, has been eliminated. The responsibility for Emergency Planning has been re-assigned to the Director of Licensing and the responsibility of industry group coordination and radioactive waste management to the Director of Regulatory Affairs and Special Projects.

Summary of Safety Evaluation

These organizational changes are administrative in nature and are of no safety significance.

1996 ANNUAL REPORT

NSE 96-3-297 RCS, REV. 0

SAFETY EVALUATION FOR DISABLING THE
REACTOR COOLANT SYSTEM SUBCOOLING ALARMS

Description and Purpose

This NSE justifies disabling the annunciator alarms for "RCS Approaching Saturation" and "RCS Saturated" on panel SKF in the Central Control Room. An analog system was installed (under NSE 86-3-002) as a result of an NRC commitment to provide backup to the Qualified Safety Parameter Display System.

Summary of Safety Evaluation

The QSPDS is the primary system used for indication of RCS subcooling and is not affected by disabling the above mentioned alarms. In addition, the alarms were not part of the NRC commitment, are not required for the recovery strategies outlined in the EOPS, and do not affect the licensing basis safety analysis.

1996 ANNUAL REPORT

NSE 96-3-355 SS, REV. 0

REMOVAL OF DOCUMENTATION OF VALVE BFD-55-4 FROM
FIGURE 10.2-4 OF THE FSAR

Description and Purpose

There is a proposed modification to install a corrosion product sampler downstream of valve BFD-55-4 which would alter the feedwater system as depicted in Figure 10.2-4 of the FSAR. This NSE evaluated removing the feedwater sample line details from the FSAR drawing.

Summary of Safety Evaluation

Valve BFD-55-4 and its associated line do not have any accident mitigation functions therefore, removing the documentation from the FSAR drawing has no safety significance.

1996 ANNUAL REPORT

NSE 96-3-440 CVCS, REV. 0

DIVERTING LETDOWN FLOW TO VCT
TO SUPPORT RCS LEAK DETECTION

Description and Purpose

This safety evaluation justified the acceptability of diverting letdown to the VCT and individually isolating demineralizers for the purpose of detecting RCS leakage.

Summary of Safety Evaluation

These steps are procedurally controlled (SOP-RCS-5 & TPC-0815), limited in duration, and will not cause RCS chemistry to fall outside of Technical Specifications or operational limits.

The change impacts only the letdown flow path inside the PAB, and does not challenge the integrity of the CVCS or the demineralizers. In addition, the CVCS demineralizers do not perform an accident mitigating or safety function.

1996 ANNUAL REPORT

NSE 96-3-455 VCV, REV. 0, REV. 1

CONTAINMENT RECIRCULATION FAN COOLER UNIT (FCU)
OPERATION DURING NORMAL PLANT OPERATION

Description and Purpose

This NSE changed the requirement in SOP-CB-10 from having a minimum of four Containment Recirculation Fan Cooler Units operating during normal plant operation to a minimum of two, and also added the requirement of having either or both 32 or 35 Containment Recirculation Fan Cooler Units in operation to provide representative sampling to Containment Air Particulate Monitor R-11 and Containment Radioactive Gas Monitor R-12.

Summary of Safety Evaluation

Reducing the requirement to two FCUs does not preclude the System from performing its safety related function. As part of the engineered safety features, all five fan cooler units are automatically activated during a design basis accident.