

Preliminary Acceptability Review (PAR) Request

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|---|--------------------------------|-------------------------|---|
| PAR Request Number PAR-11-001 | Station Name Plant Y | Unit Number 3 | PAR Request Date April 11, 2011 |
| 1. NRC PAR Notification Requested Date (see Block 8 for basis) April 13, 2011 | | | |
| 2. License Amendment Request References (as applicable) | | | |
| <input type="checkbox"/> LAR submittal date and letter number _____ | | | |
| <input checked="" type="checkbox"/> Expected LAR submittal date April 18, 2011 | | | |
| 3. Brief Description of Proposed Change | | | |
| <p>An as-built inspection of an elevation section of an above-grade exterior concrete wall of a power source building (PS/B) revealed that the wall is approximately 0.25 inch thicker in some localized areas than the maximum dimension specified in the acceptance criteria of ITAAC No. 1 in Tier 1 Table 2.2-4.</p> <p>An initial engineering evaluation of the as-built wall concluded that the out-of-tolerance condition would not adversely affect the form or design function of the PS/B or any other SSC. [Licensee] proposes to accept the as-built wall without modification.</p> | | | |
| 4. Reason for License Amendment Request | | | |
| <p>The acceptance criteria for ITAAC No. 1 in Tier 1 Table 2.2-4 requires the as-built concrete walls of the PS/B to conform to the dimensions identified in Table 2.2-2, and within the specified construction tolerances. Table 2.2-2 specifies a thickness of 2 feet–8 inches, with a tolerance of +1/-1 inch (identified in the ITAAC acceptance criteria).</p> <p>The thickness of the as-built wall is approximately 2 feet–9.25 inches in some localized areas and therefore, does not meet the acceptance criteria of ITAAC No. 1 in Tier 1 Table 2.2-4. Because this out-of-tolerance condition does not adversely affect the form or design function of the PS/B or any other SSC, [Licensee] proposes to accept the as-built wall section without modification.</p> <p>A license amendment request will be submitted to allow a one-time departure from the requirements of Tier 1 Table 2.2-4, ITAAC No. 1 for the subject PS/B wall section.</p> | | | |
| 5. Is Exemption Request Required? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | | |
| If Yes, Briefly Describe Reason for Exemption | | | |
| The proposed one-time departure from the acceptance criteria of Tier 1 Table 2.2-4, ITAAC No. 1 requires a plant-specific exemption from the design certification rule for the [Design]. | | | |
| 6. Preliminary Assessment of Significant Hazards Consideration [10 CFR 50.92(c)] | | | |
| [Licensee] has performed an initial assessment of whether a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, Issuance of Amendment, as discussed below: | | | |
| 1) <u>Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?</u> | | | |
| Response: No. | | | |
| The proposed amendment is a one-time departure from the acceptance criteria of Tier 1 Table 2.2-4, ITAAC No. 1. The departure would allow a minor (0.25 inch) deviation in the thickness of a single elevation section of an above-grade exterior concrete wall of a PS/B. An initial engineering evaluation concluded that the deviating condition would not adversely affect the form or design function of the PS/B, or any other SSC. Therefore, the proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. | | | |

| PAR Request Number PAR-11-001 | Station Name Plant Y | Unit Number 3 | PAR Request Date April 11, 2011 |
|---|-------------------------|------------------|------------------------------------|
| <p>2) <u>Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?</u> Response: No.</p> <p>The proposed amendment is a one-time departure from the acceptance criteria of Tier 1 Table 2.2-4, ITAAC No. 1. The departure would allow a minor (0.25 inch) deviation in the thickness of a single elevation section of an above-grade exterior concrete wall of a PS/B. An initial engineering evaluation concluded that the deviating condition would not adversely affect the form or design function of the PS/B, or any other SSC. Therefore, the proposed license amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.</p> <p>3) <u>Does the proposed amendment involve a significant reduction in a margin of safety?</u> Response: No.</p> <p>The proposed amendment is a one-time departure from the acceptance criteria of Tier 1 Table 2.2-4, ITAAC No. 1. The departure would allow a minor (0.25 inch) deviation in the thickness of a single elevation section of an above-grade exterior concrete wall of a PS/B. An initial engineering evaluation concluded that the deviating condition would not adversely affect the form or design function of the PS/B, or any other SSC. Therefore, the proposed license amendment does not involve a significant reduction in a margin of safety.</p> <p>Based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change, (2) the proposed change will comply with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.</p> | | | |
| <p>7. Preliminary Assessment of Categorical Exclusion from Environmental Review [10 CFR 51.22]</p> <p>[Licensee] has performed an initial assessment of the proposed amendment for environmental considerations. The assessment concluded that the proposed amendment involves no significant hazards consideration and would not affect plant effluents or occupational radiation exposure. The assessment determined that the proposed amendment would grant an exemption from a requirement, with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or a significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.</p> | | | |
| <p>8. Impact of Change on Installation and Testing Schedules</p> <p>Test results indicate that the compressive strength of the as-built concrete wall section is acceptable. The assembly of reinforcing steel for the adjoining elevation section of the subject wall is in progress and is scheduled for completion on April 13, 2011. The concrete pour for the adjoining elevation section is scheduled to commence on April 14, 2011. Therefore, the construction schedule will be delayed if the PAR Notification is not received by April 13, 2011.</p> <p>Accessibility for NRC inspection of the as-built concrete wall section, or any other SSC, would not be impacted by the proposed amendment or the continued construction of the adjoining elevation section of the subject wall.</p> | | | |
| <p>9. Impact of Change on ITAAC</p> <p>The proposed amendment does not change any ITAAC; the amendment would only allow a one-time departure from the requirements of Tier 1 Table 2.2-4, ITAAC No. 1 for the subject PS/B wall section. The requirements of Tier 1 Table 2.2-4, ITAAC No. 1 would continue to apply to other SSCs within the scope of the ITAAC.</p> | | | |
| <p>10. Additional Information</p> <p>None.</p> | | | |

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|---|--------------------------------|-------------------------|---|
| PAR Request Number PAR-11-001 | Station Name Plant Y | Unit Number 3 | PAR Request Date April 11, 2011 |
| 11. Preparer Name (Print) | 12. Preparer Signature | | 13. Date |
| 14. Reviewer Name (Print) | 15. Reviewer Signature | | 16. Date |
| 17. Approver Name (Print) | 18. Approver Signature | | 19. Date |

SIMULATION ONLY

Preliminary Acceptability Review (PAR) Request

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|--|--------------------------------|-------------------------|---|
| PAR Request Number PAR-11-002 | Station Name Plant Y | Unit Number 3 | PAR Request Date April 11, 2011 |
| 1. NRC PAR Notification Requested Date (see Block 8 for basis) April 13, 2011 | | | |
| 2. License Amendment Request References (as applicable) | | | |
| <input type="checkbox"/> LAR submittal date and letter number _____ | | | |
| <input checked="" type="checkbox"/> Expected LAR submittal date April 18, 2011 | | | |
| 3. Brief Description of Proposed Change | | | |
| <p>A new operating experience (OE) report, submitted by Plant X, describes a problem with the emergency letdown line 2nd isolation (solenoid-operated) valves in that they don't consistently close under certain differential pressure conditions. Plant X (R-COLA), which recently began operation and is of the same design as plant Y, successfully resolved the problem by replacing the solenoid-operated valves (SOV) with motor-operated valves (MOV).</p> <p>An initial engineering evaluation of replacing the installed emergency letdown line 2nd isolation SOVs with MOVs concluded that the MOVs would enhance plant safety and the reliability of the subject valves. Based on these conclusions and the OE from plant X, [Licensee] proposes to replace the installed SOVs with MOVs before completing pre-op testing.</p> | | | |
| 4. Reason for License Amendment Request | | | |
| <p>Tier 1 Table 2.4.4-5, ITAAC No. 9 refers to Table 2.4.4-2, which specifies SOVs for the emergency letdown line 2nd isolation valves. The proposed replacement of the installed SOVs with MOVs represents a change from Tier 1 information.</p> <p>A license amendment request will be submitted to allow a departure from the requirements of Tier 1 Table 2.4.4-5, ITAAC No. 9, and Table 2.4.4-2 for the emergency letdown line 2nd isolation valves.</p> | | | |
| 5. Is Exemption Request Required? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | | |
| If Yes, Briefly Describe Reason for Exemption | | | |
| <p>The proposed departure from Tier 1 Table 2.4.4-5, ITAAC No. 9, and Table 2.4.4-2 requires a plant-specific exemption from the design certification rule for the [Design].</p> | | | |
| 6. Preliminary Assessment of Significant Hazards Consideration [10 CFR 50.92(c)] | | | |
| <p>[Licensee] has performed an initial assessment of whether a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, Issuance of Amendment, as discussed below:</p> | | | |
| <p>1) <u>Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?</u></p> | | | |
| <p>Response: No.</p> | | | |
| <p>The proposed amendment is a departure from the requirements of Tier 1 Table 2.4.4-5, ITAAC No. 9, and Table 2.4.4-2. The departure would allow the installed emergency letdown line 2nd isolation SOVs to be replaced with MOVs. This modification and associated testing would be performed in accordance with applicable codes and standards.</p> | | | |
| <p>An initial engineering evaluation, with regard to accidents previously evaluated, concluded that this change would not adversely affect the design or safety functions of the subject valves, or any other SSC. Therefore, the proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.</p> | | | |

| PAR Request Number PAR-11-002 | Station Name Plant Y | Unit Number 3 | PAR Request Date April 11, 2011 |
|---|-------------------------|------------------|------------------------------------|
| <p>2) <u>Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?</u> Response: No.</p> <p>The proposed amendment is a departure from the requirements of Tier 1 Table 2.4.4-5, ITAAC No. 9, and Table 2.4.4-2. The departure would allow the installed emergency letdown line 2nd isolation SOVs to be replaced with MOVs. This modification and associated testing would be performed in accordance with applicable codes and standards.</p> <p>An initial engineering evaluation concluded that this change would not adversely affect the design or safety functions of the subject valves, or any other SSC, during any plant operating or accident condition. Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.</p> <p>3) <u>Does the proposed amendment involve a significant reduction in a margin of safety?</u> Response: No.</p> <p>The proposed amendment is a departure from the requirements of Tier 1 Table 2.4.4-5, ITAAC No. 9, and Table 2.4.4-2. The departure would allow the installed emergency letdown line 2nd isolation SOVs to be replaced with MOVs. This modification and associated testing would be performed in accordance with applicable codes and standards.</p> <p>An initial engineering evaluation concluded that this change would enhance plant safety and the reliability of the subject valves, and would not adversely affect other SSCs. Therefore, the proposed license amendment does not involve a significant reduction in a margin of safety.</p> <p>Based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change, (2) the proposed change will comply with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.</p> | | | |
| <p>7. Preliminary Assessment of Categorical Exclusion from Environmental Review [10 CFR 51.22]</p> <p>[Licensee] has performed an initial assessment of the proposed amendment for environmental considerations. The assessment concluded that the proposed amendment involves no significant hazards consideration and would not affect plant effluents or occupational radiation exposure. The assessment determined that the proposed amendment would grant an exemption from a requirement, with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or a significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.</p> | | | |
| <p>8. Impact of Change on Installation and Testing Schedules</p> <p>Preparations are being made to complete the pre-op testing of the emergency core cooling system. This is one of the last pre-op tests and is critical path on the schedule; however, the installed emergency letdown line 2nd isolation SOVs need to be replaced with MOVs before the testing begins. The replacement MOVs are on site and the modifications can be implemented in two work shifts. The pre-op testing is scheduled to commence on April 15, 2011. Therefore, the construction schedule will be delayed, day-for-day, if the PAR Notification is not received by April 13, 2011.</p> <p>The valve replacement and post-modification testing activities will be accessible for NRC inspection. The proposed change would not affect the accessibility for NRC inspection of any other SSC.</p> | | | |

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| PAR Request Number PAR-11-002 | Station Name Plant Y | Unit Number 3 | PAR Request Date April 11, 2011 |
| 9. Impact of Change on ITAAC <p>The proposed amendment does not change any ITAAC; the amendment would only allow a plant-specific departure from the requirements of Tier 1 Table 2.4.4-5, ITAAC No. 9, and Table 2.4.4-2 for the emergency letdown line 2nd isolation valves. The requirements of Tier 1 Table 2.4.4-5, ITAAC No. 9 would continue to apply to other SSCs within the scope of the ITAAC.</p> | | | |
| 10. Additional Information None. | | | |
| 11. Preparer Name (Print) | 12. Preparer Signature | | 13. Date |
| 14. Reviewer Name (Print) | 15. Reviewer Signature | | 16. Date |
| 17. Approver Name (Print) | 18. Approver Signature | | 19. Date |

Preliminary Acceptability Review (PAR) Request Template

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|---|--------------------------------|-------------------------|--|
| PAR Request Number New Electrical Pens PAR-11-003 | Station Name Plant A | Unit Number 3 | PAR Request Date April 6, 2011 |
| 1. NRC PAR Notification Requested Date (see Block 8 for basis) <u>April 13, 2011</u> | | | |
| 2. License Amendment Request References (as applicable) | | | |
| <input type="checkbox"/> LAR submittal date and letter number _____ | | | |
| <input checked="" type="checkbox"/> Expected LAR submittal date <u>April 27, 2011</u> | | | |
| 3. Brief Description of Proposed Change | | | |
| <p>In this hypothetical example, Tier 1 Tables 2.2.1-1 and 2.2.3-6 must be revised to add the new penetration information.</p> <p>Because of design finalization the number, size and type of electrical loads has increased. This design change increases the number of containment electrical penetrations from 25 to 29. Specifically, it adds two additional Class Non-1E Low Voltage Power and Control and two Class Non-1E Instrumentation and Control penetrations. Additionally, it changes one existing penetration from "low voltage control power" to "low voltage power".</p> | | | |
| 4. Reason for License Amendment Request | | | |
| Tier 1 Tables 2.2.1-1 and 2.2.3-6 must be revised to add the new penetration information. | | | |
| 5. Is Exemption Request Required? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | | |
| If Yes, Briefly Describe Reason for Exemption | | | |
| <p>Plant A will not exactly match the plant description given in Tables 2.2.1-1 and 2.2.3-6. Plant A will have additional Electrical Penetrations.</p> | | | |

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| PAR Request Number | Station Name | Unit Number | PAR Request Date |
| New Electrical Pens | Plant A | 3 | April 6, 2011 |
| PAR-11-003 | | | |

6. Preliminary Assessment of Significant Hazards Consideration [10 CFR 50.92(c)]

Plant A has evaluated whether or not a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The increase in the number of electrical penetrations thru the Containment Vessel (CV) from 25 to 29 has been reviewed for affects on the CV performance during a design basis event which would increase the internal containment pressure. The CV was shown to continue to respond within the documented analysis results. The stresses on the CV were shown to be adequately offset by the addition of the penetration buildups and weld in accordance with the design requirements. The new penetrations will be subject to the same testing requirements as the current penetrations as determined by the DCD. The addition of 4 penetrations will not result in an increase of the allowed leakage since the allowable leakage does not take into account the number of penetrations. The allowable leakage values will remain as defined by the DCD and the resulting on-site and off-site dose will remain within the established limits. These new electrical penetrations are within the same area as the current designed electrical penetrations thus no changes to the penetration room filtration system are required. Modifications to the CV will be made in accordance with existing codes and standards.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

| PAR Request Number | Station Name | Unit Number | PAR Request Date |
|-----------------------------------|--------------|-------------|------------------|
| New Electrical Pens PAR-11-003 | Plant A | 3 | April 6, 2011 |

Response: No.

The new penetrations being installed are consistent with the current design of electrical penetrations for containment. No changes in design are being introduced with this modification. The supports for the new penetrations are consistent with the current design. Since the same design standard is being used for the new penetrations, no new credible failure mechanisms, malfunctions, or accident initiators are being introduced.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No.

Inclusion of these new penetrations into the ITAAC and adherence to existing codes and standards confirms that these new penetrations will not introduce a reduction in safety margin. The allowable leakage rate limit is not changed due to these new penetrations. No new analysis methods were introduced to support this change. Regulatory and licensing requirements continue to be met.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

| PAR Request Number | Station Name | Unit Number | PAR Request Date |
|---|---------------------|--------------------|-------------------------|
| New Electrical Pens PAR-11-003 | Plant A | 3 | April 6, 2011 |

Based on the preliminary evaluation above, PLANT A concludes that the proposed amendment(s) does (do) not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a preliminary finding of “no significant hazards consideration” is justified.

7. Preliminary Assessment of Categorical Exclusion from Environmental Review [10 CFR 51.22]

A review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or a significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

8. Impact of Change on Installation and Testing Schedules

Because of design finalization the number, size and type of electrical loads has increased. This design change increases the number of containment electrical penetrations from 25 to 29. Specifically, it adds two additional Class Non-1E Low Voltage Power and Control and two Class Non-1E Instrumentation and Control penetrations. Additionally, it changes one existing penetration from “low voltage control power” to “low voltage power”. The evaluation has shown that no safety margins have been reduced. This change is needed to complete the installation of the current section of the Containment Vessel. Construction on this system is on hold pending resolution to this proposed change. A delay in the construction schedule will be realized on April 13, 2011. At that date a day for day slip will be incurred in the construction schedule. Inspection of activities related to this proposed change will be delayed pending resolution. There is no inaccessibility issues regarding this work, therefore,

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| PAR Request Number New Electrical Pens PAR-11-003 | Station Name Plant A | Unit Number 3 | PAR Request Date April 6, 2011 |
| the NRC will have the ability to inspect the proposed change during and after construction. | | | |
| 9. Impact of Change on ITAAC The addition of 4 electrical penetrations does not impact any ITAAC, add any new or modified ITAAC, or cause the removal of any ITAAC, | | | |
| 10. Additional Information None | | | |
| 11. Preparer Name (Print) | 12. Preparer Signature | | 13. Date |
| 14. Reviewer Name (Print) | 15. Reviewer Signature | | 16. Date |
| 17. Approver Name (Print) | 18. Approver Signature | | 19. Date |

Preliminary Acceptability Review (PAR) Request Template

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|--|--------------------------------|-------------------------|--|
| PAR Request Number Re-Bar Interference PAR-11-004 | Station Name Plant A | Unit Number 3 | PAR Request Date April 6, 2011 |
| 1. NRC PAR Notification Requested Date (see Block 8 for basis) <u>April 13, 2011</u> | | | |
| 2. License Amendment Request References (as applicable) | | | |
| <input type="checkbox"/> LAR submittal date and letter number _____ | | | |
| <input checked="" type="checkbox"/> Expected LAR submittal date <u>April 27, 2011</u> | | | |
| 3. Brief Description of Proposed Change | | | |
| <p>In this hypothetical example, it was determined during the construction of the main steam anchor that the number of reinforcing bar stirrups must be increased to resolve an interference problem. This detail is shown on a Tier 2* figure in DCD Chapter 3. The number of stirrups must be increased by one to ensure adequate spacing requirements are met while resolving the interference.</p> | | | |
| 4. Reason for License Amendment Request | | | |
| <p>This detail related to this proposed change is shown on a Tier 2* figure in DCD Chapter 3. This proposed change will require a change to this Tier 2* figure and therefore will require prior NRC approval prior to proceeding.</p> | | | |
| 5. Is Exemption Request Required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | | |
| If Yes, Briefly Describe Reason for Exemption | | | |
| 6. Preliminary Assessment of Significant Hazards Consideration [10 CFR 50.92(c)] | | | |
| <p>Plant A has evaluated whether or not a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:</p> | | | |

| PAR Request Number | Station Name | Unit Number | PAR Request Date |
|--|---------------------|--------------------|-------------------------|
| Re-Bar Interference PAR-11-004 | Plant A | 3 | April 6, 2011 |

4. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The change in rebar stirrups' configuration has been evaluated against the postulated steam line break and seismic events and found to meet all previous evaluation results. Forces on the associated connects were determined to remain below the assumed values used in the evaluation.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

5. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

This proposed change does not change the design function or operation of the SSCs involved and will not affect the SSCs' operation or its ability to perform its design function. The proposed change will not create the possibility of a new or different kind of accident due to credible new failure mechanisms, malfunctions, or accident initiators not considered in the design and licensing bases.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

| PAR Request Number | Station Name | Unit Number | PAR Request Date |
|--|---------------------|--------------------|-------------------------|
| Re-Bar Interference PAR-11-004 | Plant A | 3 | April 6, 2011 |

6. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

Modifications to the main steam anchor will be made in accordance with existing codes and standards. The addition of reinforcing bar stirrups is needed to resolve an interference problem with construction of the main steam anchor. The safety margins related to this proposed change are conservative and demonstrate compliance with regulatory and licensing requirements. The proposed change does not exceed or alter a design basis or safety limit.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the preliminary evaluation above, PLANT A concludes that the proposed amendment(s) does (do) not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a preliminary finding of “no significant hazards consideration” is justified.

7. Preliminary Assessment of Categorical Exclusion from Environmental Review [10 CFR 51.22]

The addition of reinforcing bar stirrups is needed to resolve an interference problem with construction of the main steam anchor. This proposed change is consistent with activities already identified in the FEIS and does not involve any activities not already evaluated. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or a significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10

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|--|--------------------------------|-------------------------|--|
| PAR Request Number Re-Bar Interference PAR-11-004 | Station Name Plant A | Unit Number 3 | PAR Request Date April 6, 2011 |
| CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment. | | | |
| <p>8. Impact of Change on Installation and Testing Schedules</p> <p>The addition of reinforcing bar stirrups is needed to resolve an interference problem with construction of the main steam anchor. This addition is needed in order to complete the installation and construction work related to the main steam anchor and subsequently the work related to the main steam system. Further work on this system is dependent upon this proposed change. Construction on this system is on hold pending resolution to this proposed change. A delay in the construction schedule will be realized on April 13, 2011. At that date a day for day slip will be incurred in the construction schedule. Inspection of activities related to this proposed change will be delayed pending resolution. There is no inaccessibility issues regarding this work, therefore, the NRC will have the ability to inspect the proposed change during and after construction.</p> | | | |
| <p>9. Impact of Change on ITAAC</p> <p>The addition of reinforcing bar stirrups does not impact any ITAAC, add any new or modified ITAAC, or cause the removal of any ITAAC.</p> | | | |
| <p>10. Additional Information</p> <p>None.</p> | | | |
| 11. Preparer Name (Print) | 12. Preparer Signature | | 13. Date |
| 14. Reviewer Name (Print) | 15. Reviewer Signature | | 16. Date |
| 17. Approver Name (Print) | 18. Approver Signature | | 19. Date |

Preliminary Acceptability Review (PAR) Request Template

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|--|--------------------------------|--|-------------------------------------|
| PAR Request Number PAR-11-005 | Station Name Plant B | Unit Number Unit 2 (Docket # 52-027) | PAR Request Date 4/7/2011 |
| <p>1. NRC PAR Notification Requested Date (see Block 8 for basis) <u>5/2/2011</u></p> <p>Enter the date by which the NRC is requested to issue the PAR notification. Block 8 should provide the basis for the requested date.</p> | | | |
| <p>2. License Amendment Request References (as applicable)</p> <p><input type="checkbox"/> LAR submittal date and letter number _____</p> <p><input checked="" type="checkbox"/> Expected LAR submittal date <u>4/20/2011</u> _____</p> <p>If the associated LAR was previously submitted or is being submitted concurrent with the PAR, mark the top box and enter the LAR submittal letter number and date. If the LAR has not been submitted, mark the lower box and enter the expected LAR submittal date.</p> | | | |
| <p>3. Brief Description of Proposed Change</p> <p>Enter a summary description of the proposed change. Note: a complete description of the proposed change should be provided in the LAR.</p> <p><i>Design finalization determined that there is insufficient space in the turbine building to allow the installation of piping and cable trays. To accommodate these items, the separation between Turbine building elevations 117'-6", 135'-3", 160'-0" will be increased by 3'0". As a result of the elevation changes, the overall height of the building will increase by 9'.</i></p> | | | |
| <p>4. Reason for License Amendment Request</p> <p>Briefly summarize the reason for concluding that an LAR is required (i.e., a summary of the change process evaluation).</p> <p><i>These changes impact Tier 1 General arrangement drawings and wall thickness tables. Additionally, Tier 2* Fire zone drawings are affected.</i></p> | | | |
| <p>5. Is Exemption Request Required? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, Briefly Describe Reason for Exemption</p> <p>Mark the Yes or No box to indicate whether or not an exemption request is required. If Yes, enter the reason for concluding that an exemption request is required. The exemption request, including complete technical bases, should be provided with the LAR.</p> <p><i>An exemption is required since Tier 1 figures and tables representing turbine building elevations are impacted by this change request.</i></p> | | | |

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6. Preliminary Assessment of Significant Hazards Consideration [10 CFR 50.92(c)]

Summarize the preliminary assessment of whether or not the proposed change involves a significant hazards consideration based on the criteria of 10 CFR 50.92(c). Note: the complete technical bases for the licensee's no significant hazards consideration determination should be provided in the LAR.

A preliminary assessment of the criteria in 10 CFR 50.92(c) has determined that the proposed changes do not involve a significant hazards consideration as discussed below:

1. *Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated? No – The proposed changes involve minor structural modifications to the turbine building and the resulting impacts to fire zones. Modifications to the structure will be made in accordance with existing codes and standards, and the fire zones will be modified in accordance with established requirements. The turbine building structure itself and the contents within are non-safety related and are not credited in any accident scenario. These changes do not impact any accident initiator, initiating condition or assumption. As the modifications are to the turbine building, no radiological impacts are involved and thus no radiological accidents are affected.*
2. *Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated? No - These proposed changes do not introduce a new or different failure mode or mechanism. Use of approved building and structural codes maintains the design in accordance with previously analyzed acceptance criteria, and therefore helps ensure consistency in the adequacy of the final design. This design consistency helps to prevent new or different kinds of accidents from being introduced.*
3. *Does the proposed amendment involve a significant reduction in a margin of safety? No- These proposed changes do not significantly reduce a margin of safety since changes are being implemented in accordance with the criteria established in the original design specifications. The building modifications do not impact any of the inputs utilized in any of the safety analyses performed in support of the Technical Specifications of the FSAR. Since the codes and standards are continuing to be utilized for construction as previously approved, no significant reductions in safety margins are involved.*

7. Preliminary Assessment of Categorical Exclusion from Environmental Review [10 CFR 51.22]

Summarize the preliminary assessment of whether or not the proposed change qualifies for an exclusion from environmental review under 10 CFR 51.22. Note: the complete technical bases for the licensee's determination regarding environmental review exclusion should be provided in the LAR.

For changes that do not qualify for categorical exclusion, provide additional information on the scope of proposed work that may be performed without irreversible environmental impact.

A preliminary assessment of the criteria in 10 CFR 51.22(c)(9) has determined that the proposed changes do qualify for a categorical exclusion as discussed below:

1. *The amendment involves no significant hazards consideration. Correct - see response to item 6 above.*
2. *There is no significant change in the types or significant increase in the amounts of effluents that may be released offsite. Correct – The modification to the turbine building structure has no impact on any*

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radiological aspects of the plant. The turbine building is outside the radiation controlled area and the proposed changes to the structure do not impact and of the radiological plant systems.

3. *There is not significant increase in individual or cumulative occupational radiation exposure. Correct – The turbine building structure is outside the radiation controlled area, and does not perform a function to control or prevent exposure. Therefore the proposed changes have no impact on individual or cumulative radiation exposure.*

8. Impact of Change on Installation and Testing Schedules

Summarize the results of the evaluation of the impact of the proposed change on the installation and testing schedules for affected SSCs. This block should provide the basis for the date the NRC is requested to issue the PAR notification (Block 1) and should identify the following types of inspectability impacts resulting from the proposed change:

- acceleration or delay in planned installation or test activities
- inaccessibility of certain SSCs for NRC inspection following the change
- new or modified activity with a limited window for NRC inspection

The NRC is requested to approve this change by 4/29/2011 such that construction activities for the turbine building can commence on 5/2/2011. The timeline for the currently planned inspection activities are not affected by this change as there are no changes to construction sequence, component placement, or test activities. The change is only increasing the height of turbine building elevations to improve constructability.

9. Impact of Change on ITAAC

Summarize the results of the evaluation of the impact of the proposed change on ITAAC. The summary should describe plans for any new or modified ITAAC, or the removal of any ITAAC, along with the reason for such changes. An estimated schedule for the installation and testing activities associated with the proposed change(s) should be included. This block should also identify specific activities for which direct inspection can only take place within a given time frame. For example, licensees should identify when proposed new tests, including one-time type tests, will be performed, and when changes will become inaccessible for inspection due to ongoing construction activities.

There are no ITAACs related to the construction of the turbine building that are affected by the change in floor

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| <p><i>elevation. All of the relevant information needed to complete the ITAACs are updated with this LAR request.</i></p> <p><i>Additionally, no inspection activities are changed by these LAR. The change is only affecting the separation in building elevations, not changing location, type, or placement of components.</i></p> | | | |
| <p>10. Additional Information</p> <p>This PAR section is optional and may be used to provide any additional information that may facilitate the NRC's review. Enter "None" if no additional information is provided.</p> | | | |
| 11. Preparer Name (Print) | 12. Preparer Signature | | 13. Date |
| 14. Reviewer Name (Print) | 15. Reviewer Signature | | 16. Date |
| 17. Approver Name (Print) | 18. Approver Signature | | 19. Date |

Preliminary Acceptability Review (PAR) Request Template

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|---|--------------------------------|--|--|
| PAR Request Number PAR-11-006 | Station Name Plant B | Unit Number Docket Number 52-027 | PAR Request Date April 6, 2011 |
| <p>1. NRC PAR Notification Requested Date (see Block 8 for basis) April 20, 2011 _____</p> <p>Enter the date by which the NRC is requested to issue the PAR notification. Block 8 should provide the basis for the requested date.</p> | | | |
| <p>2. License Amendment Request References (as applicable)</p> <p><input type="checkbox"/> LAR submittal date and letter number _____</p> <p><input checked="" type="checkbox"/> Expected LAR submittal date April 18, 2011 _____</p> <p>If the associated LAR was previously submitted or is being submitted concurrent with the PAR, mark the top box and enter the LAR submittal letter number and date. If the LAR has not been submitted, mark the lower box and enter the expected LAR submittal date.</p> | | | |
| <p>3. Brief Description of Proposed Change</p> <p>Enter a summary description of the proposed change. Note: a complete description of the proposed change should be provided in the LAR.</p> <p>The main condenser has a flashbox on it which is designed to recover the saturated heater drain. As part of design finalization, it was determined that the flashbox size needed to be increased, however the turbine building structure was an obstruction to the modification. In addition, several other areas around the condenser in the turbine building condenser pit have interface restrictions. To address these interface limitations, structural building modifications are necessary.</p> | | | |
| <p>4. Reason for License Amendment Request</p> <p>Briefly summarize the reason for concluding that an LAR is required (i.e., a summary of the change process evaluation).</p> <p>These turbine building structural modifications will impact Tier 2* information, specifically drawings to fire zones contained in Chapter 9A.</p> | | | |
| <p>5. Is Exemption Request Required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If Yes, Briefly Describe Reason for Exemption</p> <p>Mark the Yes or No box to indicate whether or not an exemption request is required. If Yes, enter the reason for concluding that an exemption request is required. The exemption request, including complete technical bases, should be provided with the LAR.</p> | | | |

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6. Preliminary Assessment of Significant Hazards Consideration [10 CFR 50.92(c)]

Summarize the preliminary assessment of whether or not the proposed change involves a significant hazards consideration based on the criteria of 10 CFR 50.92(c). Note: the complete technical bases for the licensee's no significant hazards consideration determination should be provided in the LAR.

A preliminary assessment of the criteria in 10 CFR 50.92(c) has determined that the proposed changes do not involve a significant hazards consideration as discussed below:

4. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated? No – The proposed changes involve minor structural modifications to the turbine building and the resulting impacts to fire zones. Modifications to the structure will be made in accordance with existing codes and standards, and the fire zones will be modified in accordance with established requirements. These changes do not impact any accident initiator, initiating condition or assumption. As the modifications are to the turbine building, no radiological impacts are involved and thus no radiological accidents are affected.
5. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated? No - These proposed changes do not introduce a new or different failure mode or mechanism. Use of approved building and structural codes maintains the design in accordance with previously analyzed acceptance criteria, and therefore helps ensure consistency in the adequacy of the final design. This design consistency helps to prevent new or different kinds of accidents from being introduced.
6. Does the proposed amendment involve a significant reduction in a margin of safety? No- These proposed changes do not significantly reduce a margin of safety since changes are being implemented in accordance with the criteria established in the original design specifications. The building modifications do not impact any of the inputs utilized in any of the safety analyses performed in support of the Technical Specifications of the FSAR. Since the codes and standards are continuing to be utilized for construction as previously approved, no significant reductions in safety margins are involved.

7. Preliminary Assessment of Categorical Exclusion from Environmental Review [10 CFR 51.22]

Summarize the preliminary assessment of whether or not the proposed change qualifies for an exclusion from environmental review under 10 CFR 51.22. Note: the complete technical bases for the licensee's determination regarding environmental review exclusion should be provided in the LAR.

A preliminary assessment of the criteria in 10 CFR 51.22(c)(9) has determined that the proposed changes do qualify for a categorical exclusion as discussed below:

4. The amendment involves no significant hazards consideration. Correct - see response to item 6 above.
5. There is no significant change in the types or significant increase in the amounts of effluents that may be released offsite. Correct – The modification to the turbine building structure has no impact on any radiological aspects of the plant. The turbine building is outside the radiation controlled area and the proposed changes to the structure do not impact and of the radiological plant systems.
6. There is not significant increase in individual or cumulative occupational radiation exposure. Correct – The turbine building structure is outside the radiation controlled area, and does not perform a function to control or prevent exposure. Therefore the proposed changes have no impact on individual or cumulative radiation exposure.

For changes that do not qualify for categorical exclusion, provide additional information on the scope of proposed work that may be performed without irreversible environmental impact.

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8. Impact of Change on Installation and Testing Schedules

Summarize the results of the evaluation of the impact of the proposed change on the installation and testing schedules for affected SSCs. This block should provide the basis for the date the NRC is requested to issue the PAR notification (Block 1) and should identify the following types of inspectability impacts resulting from the proposed change:

- acceleration or delay in planned installation or test activities
- inaccessibility of certain SSCs for NRC inspection following the change
- new or modified activity with a limited window for NRC inspection

Construction of the turbine building foundation is scheduled to begin upon receipt of the COL. The proposed changes to the turbine building basement will necessitate conforming changes to the turbine building foundation. Therefore, construction activities supporting this change are scheduled to begin immediately upon receipt of the COL.

9. Impact of Change on ITAAC None

Summarize the results of the evaluation of the impact of the proposed change on ITAAC. The summary should describe plans for any new or modified ITAAC, or the removal of any ITAAC, along with the reason for such changes. An estimated schedule for the installation and testing activities associated with the proposed change(s) should be included. This block should also identify specific activities for which direct inspection can only take place within a given time frame. For example, licensees should identify when proposed new tests, including one-time type tests, will be performed, and when changes will become inaccessible for inspection due to ongoing construction activities.

10. Additional Information None

This PAR section is optional and may be used to provide any additional information that may facilitate the NRC's review. Enter "None" if no additional information is provided.

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| | | | |
| 11. Preparer Name (Print) | 12. Preparer Signature | | 13. Date |
| 14. Reviewer Name (Print) | 15. Reviewer Signature | | 16. Date |
| 17. Approver Name (Print) | 18. Approver Signature | | 19. Date |

SIMULATION ONLY