Enclosure I to the Letter from C. W. Giesler

To H. R. Denton

Dated June 29, 1984

Proposed Amendment No. 55a to the KNPP Technical Specifications

Description,

Safety Evaluation

and

Significant Hazards Determination

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Proposed Amendment No. 55a to the KNPP Technical Specifications

The specific changes in this proposed amendment, along with their safety evaluations and significant hazards determinations, are identified below.

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Page TSi

Description of Changes

The Table of Contents for the Technical Specifications has been updated to reflect the proposed changes.

Safety Evaluation

Since these changes are purely administrative in nature they do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c), we have determined that these changes do not represent a significant hazards concern.

Section 1.0 Definitions

TS 1.0.e, Page TS 1.1-2

Description of Changes

The definition of the term "Operable" has been revised consistent with the Model Technical Specifications (MTS) provided by the NRC in Reference 4 (MTS 1.6). An explicit statement has been added to ensure that necessary

support equipment and normal and emergency electrical power supplies are available to maintain the operability of Engineered Safeguards equipment within the single failure criterion.

Safety Evaluation

Reference 1, transmitted a Technical Evaluation Report (TER) concerning the extent to which the existing and proposed KNPP Technical Specifications were in compliance with the definition and application of the term "Operable", as clarified by the NRC in Reference 4. This report concluded that the definition currently in the KNPP Technical Specifications was less comprehensive than that in the NRC's MTS (Reference 4) since it did not explicitly address support equipment or electrical power supplies. In our letter of April 25, 1984 (Reference 2), we committed to modify our existing definition to be consistent with MTS 1.6. This proposed revision further clarifies the intent of the KNPP Technical Specifications and fulfills this committment.

These changes do not alter the intent or our interpretation of the KNPP Technical Specifications, but merely clarifies it. Since these changes are consistent with the NRC's MTS and reflect requirements which have already been reviewed and approved by the NRC, they do not involve any safety concerns.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c), we have determined that these changes do not represent a significant hazards concern.

TS 1.0.g and TS 1.0.h, Page Ts 1.1-2a

Description of Changes

A new page has been added (TS 1.1-2a) and TS 1.0.g and TS 1.0.h moved as a result of carryover from page TS 1.1-2. No changes have been made to these definitions.

Safety Evaluation

Since these changes are purely administrative in nature they do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c), we have determined that these changes do not represent a significant hazards concern.

Section 3.3 Engineered Safety Features and Auxiliary Systems

TS 3.3.a.1.A and TS 3.3.a.1.B, Page TS 3.3-1

Description of Changes

Minor wording changes have been made to clarify the volume of water to be contained in each accumulator (1250 $ft.^3 \pm 25\ ft.^3$) and when the accumulator isolation valves should be opened with their power breakers locked out ($P_{RCS} \leq 1000$ psig).

Safety Evaluation

This water volume is consistent with the assumptions used in Chapter 14 "Safety Analysis" (Table 14.3-2a) and Chapter 6 "Engineered Safeguards" (Table 6.2-4) of the KNPP Updated Final Safety Analysis Report.

These changes do not alter the intent of these specifications but merely clarify them. Therefore, they are strictly administrative in nature and do not involve a safety concern.

Significant Hazards Determination

Based upon the above safety evaluation and the guidelines provided in 10 CFR 50.92(c), we have determined that these changes do not represent a significant hazards concern.

Enclosure II to the Letter From C. W. Giesler

To H. R. Denton

Dated June 29, 1984

Proposed Amendment No. 55a to the KNPP Technical Specifications

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e. Operable-Operability

A system or component is operable or has operability when it is capable of performing its intended function within the required range. The system or component shall be considered to have this capability when: (1) it satisfies the Limiting Conditions for Operation defined in Specification 3, and (2) it has been tested periodically in accordance with Specification 4 and has met its performance requirements. 55a

Implicit in this definition shall be the assumption that all necessary attendent instrumentation, controls, normal and emergency electrical power sources, cooling or seal water, lubrication or other auxiliary equipment that is required for the system or component to perform its intended function is also capable of performing their related support functions. 55a

f. Operating

A system or component is considered to be operating when it is performing the intended function in the intended manner.

g. Containment System Integrity

Containment System integrity is defined to exist when:

1. The non-automatic Containment System isolation valves and blind flanges are closed as required.
2. The Reactor Containment Vessel and Shield Building equipment hatches are properly closed.
3. At least ONE door in both the personnel and the emergency airlocks is properly closed.
4. The required automatic Containment System isolation valves are operable or are deactivated in the closed position or at least one valve in each line having an inoperable valve is closed.
5. All requirements of Specification 4.4 with regard to Containment System leakage and test frequency are satisfied.
6. The Shield Building Ventilation System and the Auxiliary Building Special Ventilation System satisfy the requirements of Specification 3.6.b.

h. Protective Instrumentation Logic

1. Protection System Channel

A protection system channel is an arrangement of components and modules as required to generate a single protective action signal when required by a plant condition. The channel loses its identity where single action signals are combined.

3.3 ENGINEERED SAFETY FEATURES AND AUXILIARY SYSTEMS

Applicability

Applies to the operating status of Engineered Safety Features and Auxiliary Systems.

Objective

To define those limiting conditions for operation that are necessary: (1) to remove decay heat from the core in emergency or normal shutdown situations, and (2) to remove heat from containment in normal operating and emergency situations. 55

Specification

a. Accumulators

1. The reactor shall not be made critical unless the following conditions are satisfied, except as provided by Specification 3.3.a.2.

   A. Each accumulator is pressurized to at least 700 psig and contains 1250 ft^3 ± 25 ft^3 of water with a boron concentration of at least 1900 ppm, and is not isolated. 55a

   B. Accumulator isolation valves SI-20A and SI-20B shall be opened with their power breakers locked out at or before the reactor coolant system pressure exceeds 1000 psig.

2. During power operation or recovery from an inadventent trip, ONE accumulator may be inoperable for a period of 1 hour. If operability is not 55