May 8, 2012

MEMORANDUM TO: Biweekly Notice Coordinator

FROM: Ravindra Joshi, Project Manager ***/RA/***
Licensing Branch 4 (LB4)
Division of New Reactor Licensing
Office of New Reactors

SUBJECT: REQUEST FOR PUBLICATION IN BIWEEKLY FR NOTICE - NOTICE OF CONSIDERATION OF ISSUANCE OF AMENDMENTS TO FACILITY OPERATING LICENSES AND COMBINED LICENSES, PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION, AND OPPORTUNITY FOR A HEARING (TAC NO. RP9402)

Southern Nuclear Operating Company, Inc., Docket Nos. 52-025 and 52-026, Vogtle Electric Generating Plant (VEGP) Units 3 and 4, Burke County, Georgia

Date of amendment request: February 24, 2012

Description of amendment request: The proposed changes would amend Combined License Nos. NPF-91 and NPF-92, for VEGP Units 3 and 4, respectively, in regard to the Technical Specifications (TS). The proposed amendment updates the TS for operator usability that more closely aligns with the form and content of other improved Standard Technical Specifications NUREGs. Specifically, the changes would result in closer alignment with the guidance of the Technical Specifications Task Force (TSTF) Writer's Guide for Plant-Specific Improved Technical Specifications, TSTF-GG-05-01, Revision 1, and with NUREG-1431, Standard Technical Specifications-Westinghouse Plants as updated by Nuclear Regulatory Commission (NRC) approved generic changes.

Basis for proposed no significant hazards consideration determination: As required under Title 10 of the *Code of Federal Regulations*, Part 50, section 91(a) (10 CFR 50.91(a)), the licensee has

provided its analysis of the issue of no significant hazards consideration, which is presented below:

In accordance with the provisions of 10 CFR 50.90, Southern Nuclear Operating Company (SNC) proposes to amend the VEGP TS. Evaluations pursuant to 10 CFR 50.92 showing that the proposed changes do not involve significant hazards considerations are provided for each change.

However, due to the significant number of changes associated with the upgrade effort, SNC has grouped similar changes into categories to facilitate the significant hazards evaluations required by 10 CFR 50.92. Generic significant hazards evaluations are provided for the Administrative, More Restrictive, Relocation, and Detail Removed categories. Each individual Less Restrictive change is addressed by a specific significant hazards evaluation. Due to the large volume of changes, obvious editorial or administrative changes (e.g., formatting, page rolls, punctuation, etc.) have not always received an explicit discussion, but are considered to be addressed by the applicable generic significant hazards evaluation for Administrative changes.

Each significant change to the TS is marked-up on the appropriate page in Enclosure 2 of its submittal and assigned a reference number reflective of the significant hazards evaluation type. The reference number assigned to a change is used in the Discussion of Change (DOC) in Enclosure 1 of its submittal which provides a detailed description (basis) for each change supporting the applicable significant hazards evaluation in Enclosure 6 of its submittal.

10 CFR 50.92 EVALUATION FOR ADMINISTRATIVE CHANGES

SNC proposes to amend the VEGP Units 3 and 4, Technical Specifications. SNC has evaluated each of the proposed TS changes identified as Administrative in accordance with the criteria set forth in 10 CFR 50.92, “Issuance of amendment,” and has determined that the proposed changes do not involve a significant hazards consideration. This significant hazards consideration is applicable to each Administrative change identified in Enclosure 1 and Enclosure 2 of its submittal.

The basis for the determination that the proposed changes do not involve a significant hazards consideration is an evaluation of these changes against each of the criteria in 10 CFR 50.92(c). The criteria and conclusions of the evaluation are presented below:

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

   Response: No.

   The proposed changes involve reformatting, renumbering, and rewording the TS. The reformatting, renumbering, and rewording process involves no technical changes to the TS. As such, these changes are administrative in nature and do not affect initiators of analyzed events or assumed mitigation of accident or transient events. Therefore, the

proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The proposed changes do not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in methods governing normal plant operation. The proposed changes will not impose any new or different requirements, or eliminate any existing requirements. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No.

   The proposed changes will not reduce a margin of safety because the changes have no effect on any safety analyses assumptions. These changes are administrative in nature. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

10 CFR 50.92 EVALUATION FOR MORE RESTRICTIVE CHANGES

This generic category include changes that impose additional requirements, decrease allowed outage times, increase the Frequency of Surveillances, impose additional Surveillances, increase the scope of Specifications to include additional plant equipment, broaden the Applicability of Specifications, or provide additional actions. These changes have been evaluated to not be detrimental to plant safety.

Changes to the TS requirements categorized as More Restrictive are annotated with an "M" in the Enclosure 1 DOC and Enclosure 2 markup of its submittal.

SNC proposes to amend the VEGP Units 3 and 4 TS. SNC has evaluated each of the proposed TS changes identified as More Restrictive in accordance with the criteria set forth in 10 CFR 50.92, “Issuance of amendment,” and has determined that the proposed changes do not involve a significant hazards consideration. This significant hazards consideration is applicable to each More Restrictive change identified in Enclosure 1 and Enclosure 2 of its submittal.

The basis for the determination that the proposed changes do not involve a significant hazards consideration is an evaluation of these changes against each of the criteria in 10 CFR 50.92(c). The criteria and conclusions of the evaluation are presented below:

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

   Response: No.

   The proposed changes provide more stringent TS requirements. These more stringent requirements do not result in operations that significantly increase the probability of initiating an analyzed event, and do not alter assumptions relative to mitigation of an accident or transient event. The more restrictive requirements continue to ensure process variables, structures, systems, and components are maintained consistent with the safety analyses and licensing basis. Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The proposed changes do not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in methods governing normal plant operation. The proposed changes do impose different Technical Specification requirements. However, these changes are consistent with the assumptions in the safety analyses and licensing basis. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No.

   The imposition of more restrictive requirements either has no effect on or increases a margin of plant safety. As provided in the discussion of change, each change in this category is, by definition, providing additional restrictions to enhance plant safety. The changes maintain requirements within the safety analyses and licensing basis. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

10 CFR 50.92 EVALUATION FOR RELOCATED SPECIFICATIONS

This generic category applies to changes that relocate entire TS Limiting Conditions for Operations (LCOs). A specific DOC for each TS identified for relocation is provided in Enclosure 1. This evaluation will be applicable to each of the changes identified with an "R" in the Enclosure 1 DOC and the associated Enclosure 2 markup of its submittal.

SNC has evaluated each of the proposed TS changes identified as Relocated Specifications in accordance with the criteria set forth in 10 CFR 50.92, “Issuance of Amendment,” and has determined that the proposed changes do not involve a significant hazards consideration. This significant hazards consideration is applicable to each Relocated Specification identified in Enclosure 1 and Enclosure 2 of its submittal.

The basis for the determination that the proposed changes do not involve a significant hazards consideration is an evaluation of these changes against each of the criteria in 10 CFR 50.92(c). The criteria and conclusions of the evaluation are presented below:

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

   Response: No.

   The proposed changes relocate LCOs for structures, systems, components, or variables that do not meet the criteria of 10 CFR 50.36(c)(2)(ii) for inclusion in TS. The affected structures, systems, components, or variables are not assumed to be initiators of analyzed events and are not assumed to mitigate accident or transient events. The requirements and Surveillances for these affected structures, systems, components, or variables are proposed to be relocated from the TS to a licensee controlled document that is controlled by the provisions of 10 CFR 50.59. The proposed changes only reduce the level of regulatory control on these requirements. The level of regulatory control has no impact on the probability or consequences of an accident previously evaluated. Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The proposed changes do not involve a physical alteration of the plant (no new or different type of equipment will be installed) or change in the methods governing normal plant operation. The proposed changes will not impose or eliminate any requirements, and adequate control of existing requirements will be maintained. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No.

   The proposed changes will not reduce a margin of safety because they have no significant effect on any safety analyses assumptions, as indicated by the fact that the requirements do not meet the 10 CFR 50.36 criteria for retention. In addition, the relocated requirements are moved without change, and any future changes to these requirements will be evaluated per 10 CFR 50.59.

NRC prior review and approval of changes to these relocated requirements, in accordance with 10 CFR 50.92, will no longer be required. There is no margin of safety attributed to NRC prior review and approval. However, the proposed changes are consistent with 10 CFR 50.36, which allows revising the TS to relocate these requirements and Surveillances to a licensee controlled document. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

10 CFR 50.92 EVALUATION FOR DETAIL REMOVED CHANGES

This generic category applies to changes that involve removing details out of the TS. These details are either supported by existing content in the TS Bases or the Final Safety Analysis Report (FSAR) or a commitment is made to add them to the TS Bases or FSAR. The removal of this information is considered to be less restrictive because it is no longer controlled by the TS change process. Typically, the information removed is descriptive in nature and its removal conforms to NUREG-1431 for format and content.

A specific DOC for each detail identified for removal is provided in Enclosure 1 of its submittal. This evaluation will be applicable to each of the changes identified with a "D" in the Enclosure 1 DOC and the associated Enclosure 2 markup of its submittal.

SNC proposes to amend the VEGP Units 3 and 4, Technical Specifications. SNC has evaluated each of the proposed TS changes identified as Detail Removed in accordance with the criteria set forth in 10 CFR 50.92, “Issuance of amendment,” and has determined that the proposed changes do not involve a significant hazards consideration. This significant hazards consideration is applicable to each Detail Removed change identified in Enclosure 1 and Enclosure 2 of its submittal.

The basis for the determination that the proposed changes do not involve a significant hazards consideration is an evaluation of these changes against each of the criteria in 10 CFR 50.92(c). The criteria and conclusions of the evaluation are presented below:

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

   Response: No.

   The proposed changes relocate certain details from the TS to other documents under regulatory control. The FSAR will be maintained in accordance with 10 CFR 50.59 and 10 CFR 52, Appendix D, Section VIII. The TS Bases are subject to the change control provisions in the Administrative Controls Chapter of the TS. Since any changes to these documents will be evaluated, no significant increase in the probability or consequences of an accident previously evaluated will be allowed. Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The proposed changes do not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operations. The proposed changes will not impose or eliminate any requirements, and adequate control of the information will be maintained. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No.

   The proposed changes will not reduce a margin of safety because they have no effect on any assumption of the safety analyses. In addition, the details to be moved from the TS to other documents are not being changed. Since any future changes to these details will be evaluated under the applicable regulatory change control mechanism, no significant reduction in a margin of safety will be allowed. A significant reduction in a margin of safety is not associated with the elimination of the 10 CFR 50.90 requirement for NRC review and approval of future changes to the relocated details. Not including these details in the TS is consistent with NUREG-1431, issued by the NRC, which allows revising the TS to relocate these requirements to a licensee controlled document controlled by 10 CFR 50.59 and 10 CFR 52, Appendix D, Section VIII, or other TS controlled or regulation controlled documents. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

10 CFR 50.92 EVALUATION FOR LESS RESTRICTIVE CHANGES

This category consists of technical changes which revise existing requirements such that more restoration time is provided, fewer compensatory measures are needed, surveillance requirements are deleted, or less restrictive surveillance requirements are required. This would also include requirements which are deleted from the TS (not relocated to other documents) and other technical changes that do not fit a generic category. These changes are evaluated individually.

Technical changes to the TS requirements categorized as "Less Restrictive" are identified with an "L" and an individual number in the Enclosure 1 DOC and Enclosure 2 markup of its submittal.

SNC proposes to amend the VEGP Units 3 and 4, Technical Specifications. SNC has evaluated each of the proposed technical changes identified as "Less Restrictive" individually in accordance with the criteria set forth in 10 CFR 50.92 and has determined that the proposed changes do not involve a significant hazards consideration.

The basis for the determination that the proposed changes do not involve a significant hazards consideration is an evaluation of these changes against each of the criteria in 10 CFR 50.92(c). The criteria and conclusions of the evaluation are presented below.

L01 SNC proposes to amend TS 1.0, "Definitions," by deleting the definition for Actuation Device Test. Reference to “overlap with the ACTUATION DEVICE TEST” that is cited in the definition of Actuation Logic Test is replaced with “overlap with the actuated device.”

Current Surveillance Requirement (SR) 3.3.2.7 (“Perform ACTUATION DEVICE TEST”) and SR 3.3.2.8 (“Perform ACTUATION DEVICE TEST for squib valves”) are deleted from current TS 3.3.2 and Table 3.3.2-1, Function 26, Engineered Safety Feature (ESF) Actuation. The equivalent requirement (using phrasing generally consistent with NUREG-1431) is included in individual Specifications for the actuated devices with the same 24 month Frequency as the deleted SRs. The impact of this reformatting is such that more appropriate, albeit less restrictive, actions would be applied when the associated device fails to meet the surveillance requirement. Also, current SR 3.3.2.9 is revised to eliminate the use of the Actuation Device Test defined term and replaced it with verification of actuation on an actual or simulated actuation signal.

SNC has evaluated whether or not 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The proposed change does not involve a physical alteration of the plant or a change in the methods governing normal plant operations. The change involves reformatting and revising the presentation of existing surveillance requirements (with no change in required system or device function), such that more appropriate, albeit less restrictive, actions would be applied when the device fails to meet the surveillance requirement. Revised surveillance requirement presentation and compliance with TS actions are not an initiator to any accident previously evaluated. As a result, the probability of an accident previously evaluated is not affected.

   The consequences of an accident as a result of the revised surveillance requirements and actions are no different than the consequences of the same accident during the existing ones. As a result, the consequences of an accident previously evaluated are not affected by this change.

   The proposed change does not alter or prevent the ability of structures, systems, and components from performing their intended function to mitigate the consequences of an initiating event within the assumed acceptance limits. The proposed change does not affect the source term, containment isolation, or radiological release assumptions used in evaluating the radiological consequences of an accident previously evaluated. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The proposed change reformats TS requirements such that more appropriate, albeit less restrictive, actions would be applied when the device fails to meet the surveillance requirement. However, the proposed change does not involve a physical alteration of the plant as described in the FSAR. No new equipment is being introduced, and equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. No change is being made to the procedures relied upon to respond to an off-normal event as described in the FSAR as a result of this change. As such, no new failure modes are being introduced. The change does not alter assumptions made in the safety analysis and licensing basis. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No.

   The proposed change will not reduce a margin of safety because it has no effect on any assumption of the safety analyses. While certain actions for inoperability of actuated devices are made less restrictive by eliminating entry into Engineered Safety Feature Actuation System (ESFAS) Actuation and Instrumentation inoperability actions, no action is made less restrictive than currently approved for any associated actuated device inoperability. As such, there is no significant reduction in a margin of safety.

L02 SNC proposes to amend current TS 5.6, “Reporting Requirements," to delete TS 5.6.1, “Occupational Radiation Exposure Report,” and TS 5.6.4, “Monthly Operating Reports.” This change results in the renumbering of TS 5.6 sections, but does not revise technical or administrative requirements. SNC stated that the change is consistent with NRC approved Industry/TSTF Standard Technical Specification Change Traveler, TSTF-369, “Removal of Monthly Operating Report and Occupational Radiation Exposure Report,” Revision 1.

SNC has reviewed the proposed no significant hazards consideration determination published on June 23, 2004 (69 FR 35067) as part of the Consolidated Line Item Improvement Process (CLIIP) for TSTF-369, Revision 1. SNC has concluded that the proposed determination presented in the notice is applicable to VEGP Units 3 and 4 and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91 (a).

L03 SNC proposes to amend TS to eliminate the use of the defined term “CORE ALTERATIONS” and incorporate changes reflected in TSTF-471-A.

SNC has evaluated whether or not 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The proposed change eliminates the use of the term “CORE ALTERATIONS,” all Required Actions requiring suspension of core alterations, and reference to core alterations in a surveillance requirement. With the exception of a fuel handling accident, core alterations are not an initiator of any accident previously evaluated. Those revised Specifications which protect the initial conditions of a fuel handling accident also require the suspension of movement of irradiated fuel assemblies. This Required Action protects the initial conditions of a fuel handling accident and, therefore, suspension of all other core alterations is not required. Suspension of core alterations, except fuel handling, does not provide mitigation of any accident previously evaluated. Therefore, eliminating the TS presentation of core alterations does not affect the initiators of the accidents previously evaluated and suspension of core alterations does not affect the mitigation of the accidents previously evaluated. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The proposed change does not involve a physical alteration of the plant as described in the FSAR. No new equipment is being introduced, and equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. No change is being made to the procedures relied upon to respond to an off-normal event as described in the FSAR as a result of this change. As such, no new failure modes are being introduced. The change does not alter assumptions made in the safety analysis and licensing basis. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No.

   Two events are postulated to occur in the plant conditions in which core alterations may be made: a fuel handling accident and a boron dilution incident. Suspending movement of irradiated fuel assemblies to prevent a fuel handling accident is retained as appropriate. As such, requiring the suspension of core alterations is an overly broad, redundant requirement that does not increase a margin of safety. Core alterations have no effect on a boron dilution incident. Core components are not involved in the creation or mitigation of a boron dilution incident and the shutdown margin (Mode 5)

and boron concentration (Mode 6) limits are based on assuming the worst-case configuration of the core components. Therefore, core alterations have no effect on a margin of safety related to a boron dilution incident. Therefore, there is no significant reduction in a margin of safety.

L04 SNC proposes to amend TS, Section 1.3, "Completion Times," Example 1.3-3 to eliminate the Required Action A.1 and Required Action B.1 second Completion Times, and to replace the discussion regarding second Completion Times with a new discussion. SNC also proposes to delete the second Completion Times associated with current TS 3.8.5, "Distribution Systems – Operating," Required Actions A.1, B.1, C.1, and D.1.

SNC has evaluated whether or not 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The proposed change eliminates certain Completion Times from the Technical Specifications. Completion Times are not an initiator to any accident previously evaluated. As a result, the probability of an accident previously evaluated is not affected. The consequences of an accident during the revised Completion Time are no different than the consequences of the same accident during the existing Completion Times. As a result, the consequences of an accident previously evaluated are not affected by this change. The proposed change does not alter or prevent the ability of structures, systems, and components (SSCs) from performing their intended function to mitigate the consequences of an initiating event within the assumed acceptance limits. The proposed change does not affect the source term, containment isolation, or radiological release assumptions used in evaluating the radiological consequences of an accident previously evaluated. Further, the proposed change does not increase the types or amounts of radioactive effluent that may be released offsite, nor significantly increase individual or cumulative occupational/public radiation exposures. The proposed change is consistent with the safety analysis assumptions and resultant consequences.

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

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

   Response: No.

   The proposed change does not involve a physical alteration of the plant as described in the FSAR. No new equipment is being introduced, and equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. No change is being made to the procedures relied upon to respond to an off-normal event as described in the FSAR as a result of this change. As such, no new failure modes are being introduced. The change does not

alter assumptions made in the safety analysis and licensing basis. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No.

   The proposed change to delete the second Completion Time does not alter the manner in which safety limits, limiting safety system settings or limiting conditions for operation are determined. The safety analysis acceptance criteria are not affected by this change. The proposed change will not result in plant operation in a configuration outside of the design basis. Therefore, there is no significant reduction in a margin of safety.

L05 SNC proposes to amend TS to eliminate LCO 3.0.8.

SNC has evaluated whether or not 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   Technical Specification actions to restore equipment to Operable and to monitor plant parameters are not initiators to any analyzed accident sequence. Operation in accordance with the proposed TS continues to ensure that plant equipment is capable of performing mitigative functions assumed by the accident analysis.

   The proposed TS change does not involve any changes to SSCs and does not alter the method of operation or control of SSCs as described in the FSAR. The current assumptions in the safety analysis regarding accident initiators and mitigation of accidents are unaffected by this change. No additional failure modes or mechanisms are being introduced and the likelihood of previously analyzed failures remains unchanged.

   The integrity of fission product barriers, plant configuration, and operating procedures as described in the FSAR will not be affected by this change. Therefore, the consequences of previously analyzed accidents will not increase because of this change. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The proposed change does not involve a physical alteration of the plant as described in the FSAR. No new equipment is being introduced, and equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. Any alteration in procedures will continue to ensure that the plant remains within analyzed limits, and no change is being made to the

procedures relied upon to respond to an off-normal event as described in the FSAR. As such, no new failure modes are being introduced. The change does not alter assumptions made in the safety analysis and licensing basis. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No.

   Margin of safety is established through equipment design, operating parameters, and the setpoints at which automatic actions are initiated. The proposed change does not alter the requirement to restore compliance with TS and to monitor plant parameter status for appropriate manual actions. Operation in accordance with the proposed TS ensures that the plant response to analyzed events will continue to provide the margins of safety assumed by the analysis. Appropriate monitoring and maintenance, consistent with industry standards, will continue to be performed.

   As such, there is no functional change to the requirements and therefore, there is no significant reduction in a margin of safety.

L06 SNC proposes to amend TS 3.2.5 to eliminate the increased frequency of verifying core power distribution parameters when the On-line Power Distribution Monitoring System (OPDMS) alarms are inoperable. This change retains the normal 24-hour Frequency and eliminates the 12-hour Frequency when OPDMS alarms are inoperable.

SNC has evaluated whether or not 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   A TS frequency for monitoring plant parameters is not an initiator to any accident sequence analyzed in the FSAR. Operation in accordance with the proposed TS continues to ensure that initial conditions assumed in the accident analysis are maintained.

   The proposed change does not involve a physical alteration of the plant as described in the FSAR and does not alter the method of operation or control of equipment as described in the FSAR. The current assumptions in the safety analysis regarding accident initiators and mitigation of accidents are unaffected by this change. Plant equipment remains capable of performing mitigative functions assumed by the accident analysis. No additional failure modes or mechanisms are being introduced and the likelihood of previously analyzed failures remains unchanged. The integrity of fission product barriers, plant configuration, and operating procedures as described in the FSAR will not be affected by this change. Therefore, the consequences of previously analyzed accidents will not increase because of this change. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The proposed change does not involve a physical alteration of the plant as described in the FSAR. No new equipment is being introduced, and equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. Any alteration in procedures will continue to ensure that the plant remains within analyzed limits, and no change is being made to the procedures relied upon to respond to an off-normal event as described in the FSAR. As such, no new failure modes are being introduced. The change does not alter assumptions made in the safety analysis and licensing basis. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No.

   Margin of safety is established through equipment design, operating parameters, and the setpoints at which automatic actions are initiated. The proposed change is acceptable because the OPDMS alarms do not impact a margin of safety. Operation in accordance with the proposed TS ensures that the plant response to analyzed events will continue to provide the margins of safety assumed by the analysis. Appropriate monitoring and maintenance, consistent with industry standards, will continue to be performed.

   As such, there is no functional change to the requirements and therefore, there is no significant reduction in a margin of safety.

L07 SNC proposes to amend the TS 3.3.1, 3.3.4, and 3.4.5 by replacing the TS Required Actions requiring the reactor trip breakers (RTBs) to be opened with two Required Actions: one Required Action states "Initiate action to fully insert all rods," and the other Required Action states "Place the Plant Control System in a condition incapable of rod withdrawal." For consistency, TS Applicabilities associated with RTB position are also being revised. Applicabilities including “RTBs closed” are revised to state "Plant Control System capable of rod withdrawal or one or more rods not fully inserted." Conversely, Applicabilities including "RTBs open" are revised to state "With Plant Control System incapable of rod withdrawal and all rods fully inserted."

SNC has evaluated whether or not 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The proposed change does not involve a physical alteration of the plant as described in the FSAR and does not alter the method of operation or control of equipment as

described in the FSAR. The current assumptions in the safety analysis regarding accident initiators and mitigation of accidents are unaffected by this change. Plant equipment remains capable of performing mitigative functions assumed by the accident analysis. However, the change involves allowing methods of compliance other than establishing or verifying RTB open or closed status to determine the condition of the capability of the Plant Control System to allow or inhibit rod withdrawal and the status of all rods inserted or not. The method of establishing this status is not an accident initiator nor involved with mitigation of the consequences of an accident. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The proposed change does allow methods of compliance other than establishing or verifying RTB open or closed status; however, RTB open or closed status will continue to be one appropriate and viable method of establishing and verifying applicable plant conditions. The proposed change does not involve a physical alteration of the plant as described in the FSAR. No new equipment is being introduced, and equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. No change is being made to the procedures relied upon to respond to an off-normal event as described in the FSAR as a result of this change. As such, no new failure modes are being introduced. The change does not alter assumptions made in the safety analysis and licensing basis. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No.

   The proposed change will not reduce a margin of safety because it has no effect on any assumption of the safety analyses. While certain interlocks depend on RTB open or close status, these interlocks and the association with RTB is not revised. When those interlocks are required, the position of RTBs will continue to dictate the appropriate protection system response. Allowing alternate methods of establishing or verifying the condition of the capability of the Plant Control System to allow or inhibit rod withdrawal and the status of all rods inserted or not, does not impact any safety analysis assumption or plant response to an analyzed event.

   As such, there is no functional change to the required plant conditions, and therefore, there is no significant reduction in a margin of safety.

L08 SNC proposes to amend the TS by deleting current TS 3.3.1, Reactor Trip System (RTS) Instrumentation, Required Actions D.1.1, D.2.1, and D.2.2 applicable to inoperable Power Range Neutron Flux channels.

SNC has evaluated whether or not 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The proposed change does not involve a physical alteration of the plant or a change in the methods governing normal plant operations. Overly restrictive and inappropriate Required Actions are being deleted since adequate compensatory measures already address the potential impact on radial power monitoring and the appropriate compensatory and mitigative actions in the event the RTS function is degraded for the Power Range Neutron Flux function. Additionally, the Surveillances for TS 3.2.4, Quadrant Power Tilt Ratio (QPTR), address the requirements unique to loss of Power Range Neutron Flux monitoring for QPTR. Eliminating overly restrictive and inappropriate Required Actions does not impact an accident initiator or impact mitigation of the consequences of any accident. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The proposed change eliminates overly restrictive and inappropriate Required Actions. However, the proposed change does not involve a physical alteration of the plant as described in the FSAR. No new equipment is being introduced, and equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. No change is being made to the procedures relied upon to respond to an off-normal event as described in the FSAR as a result of this change. As such, no new failure modes are being introduced. The change does not alter assumptions made in the safety analysis and licensing basis. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No.

   Margin of safety is established through equipment design, operating parameters, and the setpoints at which automatic actions are initiated. The proposed change will not reduce a margin of safety because it has no such effect on any assumption of the safety analyses. While certain actions for inoperability of actuated devices are made less restrictive by eliminating a potentially unnecessary power reduction, and actions that

could not be performed, no action is made less restrictive than currently approved for similar channel inoperability. Therefore, there is no significant reduction in a margin of safety.

L09 SNC proposes to amend current TS 3.3.1, "Reactor Trip System (RTS) Instrumentation," Source Range Neutron Flux Actions in Mode 2 for one and two inoperable channels. The change allows for placing inoperable channels in bypass and/or trip thereby allowing continued operation.

SNC has evaluated whether or not 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The proposed change does not involve a physical alteration of the plant or a change in the methods governing normal plant operations. However, the change involves providing actions allowing bypassing and/or tripping one or two inoperable Source Range Neutron Flux channels. Required Actions are not an accident initiator nor credited with mitigation of the consequences of an accident. The actions continue to assure operation consistent with the design provisions and within the assumptions of the safety analysis. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The proposed change involves certain less restrictive actions; however, these actions are consistent with the design provisions and with currently approved actions for other inoperable automatic RTS actuation functions. The proposed change does not involve a physical alteration of the plant as described in the FSAR. No new equipment is being introduced, and equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. No change is being made to the procedures relied upon to respond to an off-normal event as described in the FSAR as a result of this change. As such, no new failure modes are being introduced. The change does not alter assumptions made in the safety analysis and licensing basis. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No.

   Margin of safety is established through equipment design, operating parameters, and the setpoints at which automatic actions are initiated. The proposed change will not reduce a margin of safety because it has no such effect on any assumption of the safety analyses. While the change involves less restrictive actions, these actions are consistent with the design provisions and with currently approved actions for other

inoperable automatic RTS actuation Functions. These actions do not result in any conflict with the assumptions in the safety analyses and licensing basis. As such, there is no significant reduction in a margin of safety.

L10 SNC proposes to amend the TS, as follows:

- TS 3.1.8 "PHYSICS TESTS Exceptions – MODE 2," is revised to delete the listing of current Function 16.b for TS 3.3.1, "Reactor Trip System (RTS) Instrumentation";
- Current TS 3.3.1, "Reactor Trip System (RTS) Instrumentation," Table 3.3.1-1, Function 16, Reactor Trip System Interlocks requirements are removed;
- Current TS 3.3.1 Action M is deleted;
- Current TS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," Table 3.3.2-1, Function 18, ESFAS Interlocks (with the exception of Table 3.3.2-1, Function 18.b, Reactor Trip, P-4) requirements are removed; and
- Current TS 3.3.2 Action J is deleted.

SNC has evaluated whether or not 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The proposed change does not involve a physical alteration of the plant or a change in the methods governing normal plant operations. The TS RTS and ESFAS actuation functions explicitly retained in TS are those assumed to actuate in the safety analysis. The associated interlocks are necessary support functions for Operability of these TS required RTS and ESFAS functions. The removal of explicit interlock functions does not impact the design-required actuation function. Plant equipment remains capable of performing preventative and mitigative functions assumed by the accident analysis. However, the change involves removing explicit requirements, including actions that lead to reestablishing operability of the assumed actuation functions; implicitly these requirements are maintained and the actions remain viable for reestablishing operability. Since the requirements for the safety function Operability remains unchanged, removing the explicit presentation of detail is not an accident initiator nor involved with mitigation of the consequences of an accident. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The proposed change does not involve a physical alteration of the plant as described in the FSAR. No new equipment is being introduced, and equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. No change is being made to the procedures relied upon to respond to an off-normal event as described in the FSAR as a result of this change. As such, no new failure modes are being introduced. The change does not

alter assumptions made in the safety analysis and licensing basis. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No.

   The proposed change will not reduce a margin of safety because it has no effect on any assumption of the safety analyses. While the presentation of TS RTS and ESFAS actuation functions moves the associated interlocks from explicit treatment to becoming an implicit support system feature, the function continues to be required as necessary to support associated TS actuation functions. In doing so, certain actions for inoperability of interlocks are made more restrictive by now entering actions specific to the supported function's inoperability which have shorter Completion Times. However those actions are consistent with those currently approved for inoperability of that function. As such, there is no significant reduction in a margin of safety.

L11 SNC proposes to amend TS 3.3.1, "Reactor Trip System (RTS) Instrumentation," to delete:

- Current Table 3.3.1-1, Function 5, Source Range Neutron Flux High Setpoint, third row for that function including Applicability set "$3^{(e)}$,$4^{(e)}$,$5^{(e)}$" and associated references to Required Channel, Condition, and Surveillance Requirements;
- Current Table 3.3.1-1, Footnote (e); and
- Current Action R.

SNC has evaluated whether or not 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The proposed change does not involve a physical alteration of the plant or a change in the methods governing normal plant operations. The change involves removing certain actions that apply during inoperability of all four source range channels to provide indication. However, requirements and associated Required Actions continue to apply to source range channels in separate TS. The Required Actions removed are not accident initiators nor involved with mitigation of the consequences of an accident. The remaining requirements and actions continue to assure operation within the assumptions of the safety analysis. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The proposed change involves removing certain actions for inoperability of all four source range channels; however, this change does not result in any conflict with the assumptions in the safety analyses and licensing basis. The proposed change does not involve a physical alteration of the plant as described in the FSAR. No new equipment is being introduced, and equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. No change is being made to the procedures relied upon to respond to an off-normal event as described in the FSAR as a result of this change. As such, no new failure modes are being introduced. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No.

   Margin of safety is established through equipment design, operating parameters, and the setpoints at which automatic actions are initiated. The proposed change will not reduce a margin of safety because it has no such effect on any assumption of the safety analyses. While certain actions for inoperability of all four source range channels to indicate are removed, requirements and associated Required Actions continue to apply to source range channels in a separate TS. When all source range monitoring channels are inoperable, the remaining actions continue to assure operation within safety analysis assumptions. These actions are consistent with the actions presented in the NUREG-1431. As such, there is no significant reduction in a margin of safety.

L12 SNC proposes to amend current TS 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," Actions related to functions that result in valve isolation actuations. Current TS 3.3.2 Actions P, Q, R, S, T, and Z, are revised to "Declare affected isolation valve(s) inoperable." Additionally, the following current Table 3.3.2-1 Applicability Footnotes are deleted:

- (e) Not applicable for valve isolation functions whose associated flow path is isolated;
- (h) Not applicable if all main steam isolation valves (MSIVs) are closed; and
- (i) Not applicable when the startup feedwater flow paths are isolated.

SNC has evaluated whether or not 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

The proposed change does not involve a physical alteration of the plant or a change in the methods governing normal plant operations. The less restrictive Required Actions are acceptable based on the fact that the new actions are the appropriate actions for the actuated equipment. Required Actions are not an accident initiator nor credited with mitigation of the consequences of an accident. The actions continue to assure operation within the assumptions of the safety analysis and are consistent with approved actions for the actuated equipment. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The proposed change involves certain less restrictive actions; however, the actions continue to assure operation within the assumptions of the safety analysis and are consistent with approved actions for the actuated equipment. The proposed change does not involve a physical alteration of the plant as described in the FSAR. No new equipment is being introduced, and equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. No change is being made to the procedures relied upon to respond to an off-normal event as described in the FSAR as a result of this change. As such, no new failure modes are being introduced. The change does not alter assumptions made in the safety analysis and licensing basis. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No.

   The proposed change will not reduce a margin of safety because it has no effect on any assumption of the safety analyses. While the change involves less restrictive actions, the actions are consistent with approved actions for the actuated equipment. These actions do not result in any conflict with the assumptions in the safety analyses and licensing basis. As such, there is no significant reduction in a margin of safety.

L13 SNC proposes to amend current TS 3.3.3, “Post Accident Monitoring (PAM) Instrumentation,” as follows:

- Function 12 is revised from "Passive Residual Heat Removal (PRHR) Flow and PRHR Outlet Temperature," to "Passive Residual Heat Removal (PRHR) Heat Removal." In addition, the Required Channels/Divisions column is revised from "2 flow & 1 temperature," to "2."
- Function 17 is revised from "Passive Containment Cooling System (PCS) Storage Tank Level and PCS Flow," to "Passive Containment Cooling System (PCS) Heat Removal." In addition, the Required Channels/Divisions column is revised from "2 level & 1 flow," to "2."

SNC has evaluated whether or not 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The proposed change reduces the number of required Function 12 and Function 17 channels from three to two. Requiring the minimum of two redundant channels is consistent with NUREG-1431 requirements for meeting Regulatory Guide (RG) 1.97 PAM redundancy requirements. The change also relocates the details of the specific channels designed to satisfy the PAM requirements to the associated Bases. The proposed change does not involve a physical alteration of the plant or a change in the methods governing normal plant operations. PAM functions are not initiators of analyzed events and therefore the revised requirements do not result in operations that significantly increase the probability of initiating an analyzed event. The PAM function affected by this change is designed to accommodate single failure to support post-accident monitoring. The change reduces TS requirements on excess required channels; however, single failure redundancy continues to be required. Thus, the proposed change does not alter assumptions relative to mitigation of an accident or transient event. The less restrictive requirements continue to ensure process variables, structures, systems, and components are maintained consistent with the safety analyses and licensing basis.

   The TS Bases will be maintained in accordance with the change control provisions of the TS Bases Control Program described in TS 5.5.6. Because any change to the TS Bases will be evaluated, no significant increase in the probability or consequences of an accident previously evaluated will be allowed. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The proposed change does not involve a physical alteration of the plant as described in the FSAR. No new equipment is being introduced, and equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. No change is being made to the procedures relied upon to respond to an off-normal event as described in the FSAR as a result of this change. As such, no new failure modes are being introduced. The change does not alter assumptions made in the safety analysis and licensing basis. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No.

The proposed change will not reduce a margin of safety because it has no effect on any assumption of the safety analyses. In addition, the details being moved from the current TS to the TS Bases are not being changed. NRC prior review and approval of changes to these relocated requirements, in accordance with 10 CFR 50.92, will no longer be required. Future change to these details will be evaluated under the applicable regulatory change control mechanism. There is no margin of safety attributed to NRC prior review and approval; therefore, there is no significant reduction in a margin of safety.

L14 SNC proposes to amend current TS 3.3.5, "Diverse Actuation System (DAS) Manual Controls," Table 3.3.5-1, "DAS Manual Controls," footnote b; current TS 3.6.7, "Passive Containment Cooling System (PCS) – Shutdown," Applicability; and current TS 3.7.9, "Fuel Storage Pool Makeup Water Sources," LCO Notes 1, 2, and 3; Applicability, Surveillance Requirement (SR) 3.7.9.1 Note, SR 3.7.9.2 Note, SR 3.7.9.3 Note, and SR 3.7.9.4 Note by deleting "calculated" with respect to decay heat.

SNC has evaluated whether or not 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The proposed change does not involve a physical alteration of the plant or a change in the methods governing normal plant operations. The proposed change provides less stringent TS requirements for the facility by not expressly specifying the method of determining the decay heat value. These less stringent requirements do not result in operations that significantly increase the probability of initiating an analyzed event, and do not alter assumptions relative to mitigation of an accident or transient event. The less restrictive requirements continue to ensure process variables, structures, systems, and components are maintained consistent with the safety analyses and licensing basis. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The proposed change does not involve a physical alteration of the plant as described in the FSAR. No new equipment is being introduced, and equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. No change is being made to the procedures relied upon to respond to an off-normal event as described in the FSAR as a result of this change. As such, no new failure modes are being introduced. The change does not alter assumptions made in the safety analysis and licensing basis. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No.

   The proposed change will not reduce a margin of safety because it has no effect on any assumption of the safety analyses. Eliminating the imposition of single method of determining the decay heat value has no effect on or a margin of plant safety. “Calculating” the decay heat value remains a viable option. The change maintains requirements within the safety analyses and licensing basis. As such, there is no technical change to the requirements and therefore, there is no significant reduction in a margin of safety.

L15 SNC proposes to amend TS 3.4.8, "Minimum [Reactor Coolant System] RCS Flow," SR 3.4.8.1 from "Verify that at least one [Reactor Coolant Pump] RCP is in operation at ≥ 10% rated speed or equivalent," to "Verify that at least one RCP is in operation with total flow through the core ≥ 3,000 gpm."

SNC has evaluated whether or not 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The proposed change does not involve a physical alteration of the plant or a change in the methods governing normal plant operations. The change involves revising the acceptance criteria of an existing surveillance requirement with no change in required system or device function. Surveillance acceptance criteria are not accident initiators nor involved with mitigation of the consequences of any accident. The proposed acceptance criteria ensure that the applicable analysis input assumptions are preserved. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The proposed change revises the acceptance criteria of an existing surveillance requirement. However, the proposed change does not involve a physical alteration of the plant as described in the FSAR. No new equipment is being introduced, and equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. No change is being made to the procedures relied upon to respond to an off-normal event as described in the FSAR as a result of this change. As such, no new failure modes are being introduced. The change does not alter assumptions made in the safety analysis and licensing basis. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No.

The proposed change will not reduce a margin of safety because it has no effect on any assumption of the safety analyses. While the surveillance requirement acceptance criteria is made less restrictive by removal of design margin that accounts for minimizing stress and wear, and increasing equipment life, and the expected operating limit on minimum RCP speed, this margin is more appropriately maintained in the design and in operating and surveillance procedures. Therefore, there is no significant reduction in a margin of safety.

L16 SNC proposes to amend current TS 3.4.10, "RCS Specific Activity," Actions by deleting Required Action B.1, which requires "Perform SR 3.4.10.2," within 4 hours.

SNC has evaluated whether or not 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The proposed change does not involve a physical alteration of the plant or a change in the methods governing normal plant operations. The proposed change provides less stringent TS actions for the facility. However, the less restrictive requirements continue to ensure process variables, structures, systems, and components are maintained consistent with the safety analyses and licensing basis. The performance of SR 3.4.10.2 is not related to an accident initiator nor credited with mitigation of the consequences of an accident. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The proposed change does not involve a physical alteration of the plant as described in the FSAR. No new equipment is being introduced, and equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. No change is being made to the procedures relied upon to respond to an off-normal event as described in the FSAR as a result of this change. As such, no new failure modes are being introduced. The change does not alter assumptions made in the safety analysis and licensing basis. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No.

The proposed change will not reduce a margin of safety because it has no effect on any assumption of the safety analyses. The change maintains requirements within the safety analyses and licensing basis. The result of performing the additional surveillance does not provide any additional margin of safety; as such, eliminating the Required Action for performing the additional surveillance does not result in a significant reduction in a margin of safety.

L17 SNC proposes to amend TS as follows:

1. Current TS 3.5.2, "Core Makeup Tanks (CMTs) - Operating," Condition D is revised from "One CMT inoperable due to presence of noncondensible gases in one high point vent," to "One CMT inlet line with noncondensible gas volume not within limit."
2. Current TS 3.5.2, Required Action D.1 is revised from "Vent noncondensible gases," to “Restore CMT inlet line noncondensible gas volume to within limit.”
3. Current TS 3.5.2, SR 3.5.2.4 is revised from "Verify the volume of noncondensible gases in each CMT inlet line has not caused the high point water level to drop below the sensor," to "Verify the volume of noncondensible gases in each CMT inlet line is within limit."
4. Current TS 3.5.4, "Passive Residual Heat Removal Heat Exchanger (PRHR HX) – Operating," Condition C is revised from "Presence of noncondensible gases in the high point vent," to "PRHR HX inlet line noncondensible gas volume not within limit."
5. Current TS 3.5.4, Required Action C.1 is revised from "Vent noncondensible gases," to "Restore PRHR HX inlet line noncondensible gas volume to within limit."
6. Current TS 3.5.4, SR 3.5.4.3 is revised from "Verify the volume of noncondensible gases in the PRHR HX inlet line has not caused the high point water level to drop below the sensor," to "Verify the volume of noncondensible gases in the PRHR HX inlet line is within limit."
7. Current TS 3.5.5, "Passive Residual Heat Removal Heat Exchanger (PRHR HX) – Shutdown, Reactor Coolant System (RCS) Intact," Condition C is revised from "Presence of noncondensible gases in the high point vent," to "PRHR HX inlet line noncondensible gas volume not within limit."
8. Current TS 3.5.5, Required Action C.1 is revised from "Vent noncondensible gases," to "Restore PRHR HX inlet line noncondensible gas volume to within limit."
9. Current TS 3.5.6, "In-containment Refueling Water Storage Tank (IRWST) – Operating," Condition B is revised from "One IRWST injection line inoperable due to presence of noncondensible gases in one high point vent," to "One IRWST injection flow path with noncondensible gas volume in one squib valve outlet line pipe stub not within limit."
10. Current TS 3.5.6, Required Action B.1 is revised from "Vent noncondensible gases," to "Restore noncondensible gas volume in squib valve outlet line pipe stub to within limit."

11. Current TS 3.5.6, Condition C is revised from "One IRWST injection line inoperable due to presence of noncondensible gases in both high point vents," to "One IRWST injection flow path with noncondensible gas volume in both squib valve outlet line pipe stubs not within limit."

12. Current TS 3.5.6, Required Action C.1 is revised from "Vent noncondensible gases from one high point vent," to "Restore one squib valve outlet line pipe stub noncondensible gas volume to within limit."

13. Current TS 3.5.6, SR 3.5.6.3 is revised from "Verify the volume of noncondensible gases in each of the four IRWST injection squib valve outlet line pipe stubs has not caused the high-point water level to drop below the sensor," to "Verify the volume of noncondensible gases in each of the four IRWST injection squib valve outlet line pipe stubs is within limit."

14. Current TS 3.5.7, "In-containment Refueling Water Storage Tank (IRWST) – Shutdown, MODE 5," Condition B is revised from "Required IRWST injection line inoperable due to presence of noncondensible gases in one high point vent," to "Required IRWST injection flow path with noncondensible gas volume in one squib valve outlet line pipe stub not within limit."

15. Current TS 3.5.7, Required Action B.1 is revised from "Vent noncondensible gases," to "Restore noncondensible gas volume in squib valve outlet line pipe stub to within limit."

16. Current TS 3.5.7, Condition C is revised from "Required IRWST injection line inoperable due to presence of noncondensible gases in both high point vents," to "Required IRWST injection flow path with noncondensible gas volume in both squib valve outlet line pipe stubs not within limit."

17. Current TS 3.5.7, Required Action C.1 is revised from "Vent noncondensible gases from one high point vent," to "Restore one squib valve outlet line pipe stub noncondensible gas volume to within limit."

18. TS 3.5.8, "In-containment Refueling Water Storage Tank (IRWST) – Shutdown, MODE 6," Condition B is revised from "Required IRWST injection line inoperable due to presence of noncondensible gases in one high point vent," to "Required IRWST injection flow path with noncondensible gas volume in one squib valve outlet line pipe stub not within limit."

19. Current TS 3.5.8, Required Action B.1 is revised from "Vent noncondensible gases," to "Restore noncondensible gas volume in squib valve outlet line pipe stub to within limit."

20. Current TS 3.5.8, Condition C is revised from "Required IRWST injection line inoperable due to presence of noncondensible gases in both high point vents," to "Required IRWST injection flow path with noncondensible gas volume in both squib valve outlet line pipe stubs not within limit."

21. Current TS 3.5.8, Required Action C.1 is revised from "Vent noncondensible gases from one high point vent," to "Restore one squib valve outlet line pipe stub noncondensible gas volume to within limit."

SNC has evaluated whether or not 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The proposed change does not involve a physical alteration of the plant or a change in the methods governing normal plant operations. The proposed change provides less stringent TS requirements by not expressly specifying the method of determining or restoring the noncondensible gas volume that can adversely affect the associated flow path; however, the requirement that noncondensible gas volume be within limit is not changed. These less stringent requirements do not result in operations that significantly increase the probability of initiating an analyzed event, and do not alter assumptions relative to mitigation of an accident or transient event. The less restrictive requirements continue to ensure process variables, structures, systems, and components are maintained consistent with the safety analyses and licensing basis. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The proposed change does not involve a physical alteration of the plant as described in the FSAR. No new equipment is being introduced, and equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. No change is being made to the procedures relied upon to respond to an off-normal event as described in the FSAR as a result of this change. As such, no new failure modes are being introduced. The change does not alter assumptions made in the safety analysis and licensing basis. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No.

   The proposed change will not reduce a margin of safety because it has no effect on any assumption of the safety analyses. The amended actions and surveillances continue assure that noncondensible gas volumes are maintained and restored to within acceptable limits. The change maintains requirements within the safety analyses and licensing basis. As such, there is no technical change to the requirements and therefore, there is no significant reduction in a margin of safety.

L18 SNC proposes to amend current TS 3.6.8, "Containment Penetrations," LCO 3.6.8.d.2 to allow the penetration flow path to be open provided it can be closed prior to steaming into the containment. In conjunction, current SR 3.6.8.3 as well as the corresponding containment Isolation function required in current TS 3.3.2, “Engineered Safety Feature

Actuation System (ESFAS) Instrumentation," Table 3.3.2-1 Function 3.a for Modes 5 and 6, are removed. This removes requirements for Operable containment isolation signals in Modes 5 and 6, allowing manual operator actions to affect any required isolation prior to steaming into the containment.

SNC has evaluated whether or not 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The proposed change would remove requirements for Operable containment isolation signals in Modes 5 and 6, allowing manual operator action to effect any required isolation. The design provisions for instrumented closure signals are unaffected. The isolation status of the penetration flow path is not an initiator to any accident previously evaluated. As a result, the probability of an accident previously evaluated is not affected. The consequences of an accident with the valves open and capable of being closed prior to steaming into the containment are no different than the consequences of the same accident with the current requirements. The valves are currently allowed to be open, provided they can be isolated. The accident analysis assumes cooling water inventory is not lost in the event of an accident. Thus, closing the valves prior to steaming into the containment will ensure this assumption is met. As a result, the consequences of an accident previously evaluated are not affected by this change. The proposed change does not alter or prevent the ability of structures, systems, and components (SSCs) from performing their intended function to mitigate the consequences of an initiating event within the assumed acceptance limits. The proposed change does not affect the source term, containment isolation, or radiological release assumptions used in evaluating the radiological consequences of an accident previously evaluated. Further, the proposed change does not increase the types or amounts of radioactive effluent that may be released offsite, nor significantly increase individual or cumulative occupational/public radiation exposures. The proposed change is consistent with the safety analysis assumptions and resultant consequences.

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

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

   Response: No.

   The proposed change does not involve a physical alteration of the plant as described in the FSAR. No new equipment is being introduced, and equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. No change is being made to the procedures relied upon to respond to an off-normal event as described in the FSAR as a result of this change. As such, no new failure modes are being introduced. The change does not alter assumptions made in the safety analysis and licensing basis. Therefore, this

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

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

   Response: No.

   The proposed change to remove requirements for Operable containment isolation signals in Modes 5 and 6, and allowing manual operator action to isolate the purge valve penetration flow path prior to steaming into the containment, does not alter the manner in which safety limits, limiting safety system settings or limiting conditions for operation are determined. The safety analysis acceptance criteria are not affected by this change. The proposed change will not result in plant operation in a configuration outside of the design basis. As such, there is no technical change to the requirements and therefore, there is no significant reduction in a margin of safety.

L19 SNC proposes to amend current TS 3.9.6 "pH Adjustment," LCO and current SR 3.9.6.1 trisodium phosphate (TSP) requirement from the volume requirement of 560 ft^3 to a weight requirement of 26,460 lbs. In addition, due to this change, Condition A and Required Action A.1 is changed to refer to "weight" in lieu of "volume."

SNC has evaluated whether or not 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The proposed change allows for a lesser volume over time consistent with expected compaction and agglomeration. While the total weight will remain constant and sufficient to assure safety analysis assumptions are met, the unintended requirement to maintain volume > 560 ft^3, even after compaction and agglomeration is made less restrictive. The TSP is not an initiator to any accident previously evaluated. As a result, the probability of an accident previously evaluated is not affected. The consequences of an accident with the changed TSP weight limit are no different than the consequences of the same accident with the current TSP limit. The accident analysis assumes a minimum of 26,460 lbs of TSP, and this value is being maintained in the TS. The assumed pH of 7.0 will be maintained using the proposed weight of TSP. This pH will continue to augment the retention of elemental iodine in the containment water, and thus reduce the iodine available to leak to the environment. As a result, the consequences of an accident previously evaluated are not affected by this change. The proposed change does not alter or prevent the ability of SSCs from performing their intended function to mitigate the consequences of an initiating event within the assumed acceptance limits. The proposed change does not affect the source term, containment isolation, or radiological release assumptions used in evaluating the radiological consequences of an accident previously evaluated. Further, the proposed change does not increase the types or amounts of radioactive effluent that may be released offsite, nor significantly increase individual or cumulative occupational/public radiation exposures. The proposed change is consistent with the safety analysis assumptions and resultant consequences. Therefore, this change does not involve a

significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The proposed change does not involve a physical alteration of the plant as described in the FSAR. No new equipment is being introduced, and equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. No change is being made to the procedures relied upon to respond to an off-normal event as described in the FSAR as a result of this change. As such, no new failure modes are being introduced. The change does not alter assumptions made in the safety analysis and licensing basis. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No.

   The proposed change to allow for a lesser volume over time consistent with expected compaction and agglomeration, while maintaining the total weight to assure safety analysis assumptions are met, does not alter the manner in which safety limits, limiting safety system settings or limiting conditions for operation are determined. The safety analysis acceptance criteria are not affected by this change. The proposed change will not result in plant operation in a configuration outside of the design basis. As such, there is no technical change to the requirements and therefore, there is no significant reduction in a margin of safety.

L20 SNC proposes to amend current TS 3.7.2, "Main Steam Isolation Valves (MSIVs)," Condition D Note to allow separate Condition entry due to any inoperable valve covered by the LCO, not just the MSIVs.

SNC has evaluated whether or not 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The proposed change allows a separate Condition entry for each affected flow path. The failure of the main steam line flow path covered by the LCO to close is not an initiator to any accident previously evaluated. As a result, the probability of an accident previously evaluated is not affected. The consequences of an accident are not affected since the inoperability in the flow path is addressed to assure affected flow paths are isolated as assumed in the accident analysis. As a result, the consequences of an accident previously evaluated are not affected by this change. The proposed change does not alter or prevent the ability of structures, systems, and components from performing their intended function to mitigate the consequences of an initiating event

within the assumed acceptance limits. The proposed change does not affect the source term, containment isolation, or radiological release assumptions used in evaluating the radiological consequences of an accident previously evaluated. Further, the proposed change does not increase the types or amounts of radioactive effluent that may be released offsite, nor significantly increase individual or cumulative occupational/public radiation exposures. The proposed change is consistent with the safety analysis assumptions and resultant consequences. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The proposed change does not involve a physical alteration of the plant as described in the FSAR. No new equipment is being introduced, and equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. No change is being made to the procedures relied upon to respond to an off-normal event as described in the FSAR as a result of this change. As such, no new failure modes are being introduced. The change does not alter assumptions made in the safety analysis and licensing basis. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No.

   The proposed change to allow a separate Condition entry for each affected flow path does not alter the manner in which safety limits, limiting safety system settings or limiting conditions for operation are determined. The safety analysis acceptance criteria are not affected by this change. The proposed change will not result in plant operation in a configuration outside of the design basis. As such, there is no technical change to the requirements and therefore, there is no significant reduction in a margin of safety.

L21 SNC proposes to amend TS 3.8.1, "[Direct Current] DC Sources - Operating," by deleting SR 3.8.1.3 Note 2.

SNC has evaluated whether or not 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The Class 1E DC electrical power system, including associated battery chargers, is not an initiator to any accident sequence analyzed in the FSAR. Operation in accordance with the proposed TS ensures that the Class 1E DC electrical power system is capable of performing its function as described in the FSAR, therefore the mitigative functions supported by the Class 1E DC electrical power system will continue to provide the protection assumed by the accident analysis.

   The proposed TS change does not involve any changes to SSCs and does not alter the method of operation or control of SSCs as described in the FSAR. The current assumptions in the safety analysis regarding accident initiators and mitigation of accidents are unaffected by this change. No additional failure modes or mechanisms are being introduced and the likelihood of previously analyzed failures remains unchanged. The integrity of fission product barriers, plant configuration, and operating procedures as described in the FSAR will not be affected by this change. Therefore, the consequences of previously analyzed accidents will not increase because of this change.

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

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

   Response: No.

   The proposed change does not involve a physical alteration of the plant as described in the FSAR. No new equipment is being introduced, and equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. Any alteration in procedures will continue to ensure that the plant remains within analyzed limits, and no change is being made to the procedures relied upon to respond to an off-normal event as described in the FSAR. As such, no new failure modes are being introduced. The change does not alter assumptions made in the safety analysis and licensing basis.

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

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

   Response: No.

   Margin of safety is established through equipment design, operating parameters, and the setpoints at which automatic actions are initiated. The proposed change is acceptable because the operability of the Class 1E DC electrical power system is unaffected, there is no detrimental impact on any equipment design parameter, and the plant will still be required to operate within assumed conditions. Operation in accordance with the proposed TS ensures that the Class 1E DC electrical power system is capable of performing its function as described in the FSAR; therefore, the support of the Class 1E DC electrical power system to the plant response to analyzed

events will continue to provide the margins of safety assumed by the analysis. Appropriate monitoring and maintenance, consistent with industry standards, will continue to be performed.

As such, there is no technical change to the requirements and therefore, there is no significant reduction in a margin of safety.

L22 SNC proposes to amend current TS 3.8.2, "DC Sources - Shutdown," by adding a new Condition A to address inoperable battery chargers.

SNC has evaluated whether or not 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The Class 1E DC electrical power system, including associated battery chargers, is not an initiator to any accident sequence analyzed in the FSAR. Operation in accordance with the proposed TS ensures that the Class 1E DC electrical power system is capable of performing its function as described in the FSAR, therefore the mitigative functions supported by the Class 1E DC electrical power system will continue to provide the protection assumed by the accident analysis.

   The proposed change does not involve any changes to SSCs and does not alter the method of operation or control of SSCs as described in the FSAR. The current assumptions in the safety analysis regarding accident initiators and mitigation of accidents are unaffected by this change. No additional failure modes or mechanisms are being introduced and the likelihood of previously analyzed failures remains unchanged.

   The integrity of fission product barriers, plant configuration, and operating procedures as described in the FSAR will not be affected by this change. Therefore, the consequences of previously analyzed accidents will not increase because of this change.

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

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

   Response: No.

   The proposed change does not involve a physical alteration of the plant as described in the FSAR. No new equipment is being introduced, and equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. Any alteration in procedures will continue to ensure that the plant remains within analyzed limits, and no change is being made to the procedures relied upon to respond to an off-normal event as described in the FSAR. As such, no new failure modes are being introduced. The change does not alter assumptions made in the safety analysis and licensing basis.

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

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

   Response: No.

   Margin of safety is established through equipment design, operating parameters, and the setpoints at which automatic actions are initiated. The proposed change is acceptable because the Operability of the Class 1E DC electrical power system is unaffected, there is no detrimental impact on any equipment design parameter, and the plant will still be required to operate within assumed conditions. Operation in accordance with the proposed TS ensures that the Class 1E DC electrical power system is capable of performing its function as described in the FSAR; therefore, the support of the Class 1E DC electrical power system to the plant response to analyzed events will continue to provide the margins of safety assumed by the analysis. Appropriate monitoring and maintenance, consistent with industry standards, will continue to be performed.

   As such, there is no technical change to the requirements and therefore, there is no significant reduction in a margin of safety.

L23 SNC proposes to amend current TS 5.5.2, "Radioactive Effluent Control Program," to state that the provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluents Control Program surveillance frequency.

SNC has evaluated whether or not 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   A TS frequency for the determination of cumulative and projected dose contributions from radioactive effluents is not an initiator to any accident sequence analyzed in the FSAR. Operation in accordance with the proposed TS continues to ensure that initial conditions assumed in the accident analysis are maintained. The proposed change does not involve a modification to the physical configuration of the plant or change in the methods governing normal plant operation. The proposed change will not impose any new or different requirements or introduce a new accident initiator, accident precursor, or malfunction mechanism. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The proposed change does not involve a physical alteration of the plant as described in the FSAR. No new equipment is being introduced, and equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. Any alteration in procedures will continue to ensure that the plant remains within analyzed limits, and no change is being made to the procedures relied upon to respond to an off-normal event as described in the FSAR. As such, no new failure modes are being introduced. The change does not alter assumptions made in the safety analysis and licensing basis. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No.

   Margin of safety is established through equipment design, operating parameters, and the setpoints at which automatic actions are initiated. The proposed change, applying the 25% extension to the frequency of performing the monthly cumulative dose and projected dose calculations, will have no effect on the plant response to analyzed events and with therefore not impact a margin of safety. Operation in accordance with the proposed TS ensures that the plant response to analyzed events will continue to provide the margins of safety assumed by the analysis. Appropriate monitoring and maintenance, consistent with industry standards, will continue to be performed.

   As such, there is no functional change to the requirements and therefore, there is no significant reduction in a margin of safety.

L24 SNC proposes to amend current TS 5.5.3, "Inservice Testing Program," paragraph b from "The provisions of SR 3.0.2 are applicable to the above required Frequencies for performing inservice testing activities," to "The provisions of SR 3.0.2 are applicable to the above required Frequencies and other normal and accelerated Frequencies specified as 2 years or less in the Inservice Testing Program for performing inservice testing activities."

SNC has evaluated whether or not 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. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The frequency for inservice testing is not an initiator to any accident sequence analyzed in the FSAR, nor is it associated with any mitigative actions to reduce consequences. Operation in accordance with the proposed TS continues to ensure that initial conditions accident mitigative features assumed in the accident analysis are maintained. The proposed change does not involve a modification to the physical configuration of the plant or change in the methods governing normal plant operation.

The proposed change will not impose any new or different requirements or introduce a new accident initiator, accident precursor, or malfunction mechanism. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The proposed change does not involve a physical alteration of the plant as described in the FSAR. No new equipment is being introduced, and equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. Any alteration in procedures will continue to ensure that the plant remains within analyzed limits, and no change is being made to the procedures relied upon to respond to an off-normal event as described in the FSAR. As such, no new failure modes are being introduced. The change does not alter assumptions made in the safety analysis and licensing basis. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No.

   The proposed change, applying the 25% extension to certain frequencies for performing inservice testing, does not significantly degrade the reliability that results from performing the Surveillance at its specified Frequency. This is based on the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the SRs. As such, there is no technical change to the requirements and therefore, there is no significant reduction in a margin of safety. Margin of safety is established through equipment design, operating parameters, and the setpoints at which automatic actions are initiated. Operation in accordance with the proposed TS ensures that the plant response to analyzed events will continue to provide the margins of safety assumed by the analysis. Appropriate monitoring and maintenance, consistent with industry standards, will continue to be performed. As such, there is no functional change to the requirements and therefore, there is no significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

Attorney for licensee: Mr. M. Stanford Blanton, Balch & Bingham LLP, 1710 Sixth Avenue North, Birmingham, AL 35203-2015.

NRC Branch Chief: Mark E. Tonacci

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

Attorney for licensee: Mr. M. Stanford Blanton, Balch & Bingham LLP, 1710 Sixth Avenue North, Birmingham, AL 35203-2015.

NRC Branch Chief: Mark E. Tonacci

DISTRIBUTION:
Nonpublic
LB4 R/F
NRO_DNRL_LB4
RJoshi (hard copy)
R. Butler (hard copy)

ADAMS Accession No.: ML12111A046

OFFICE	NRO/LB4/PM	NRO/LB4/LA	NRO/LB4/PM	NRO/LB4/BC	NRO/LB4/PM
NAME	RJoshi (c)	RButler	DMcGovern w/changes	MTonacci	RJoshi (s)
DATE	4/25/12	04/25/12	4/26/12	05/02/12	05/08/12

OFFICIAL RECORD COPY