UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. for a Class 103 License to Acquire, Possess, and Use a Utilization Facility as Part of Unit No. 2 of the San Onofre Nuclear Generating Station	)	Docket No. 50-361 Amendment Application No. 103

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 103.

This amendment application consists of Proposed Technical Specification Change No. NPF-10-344 to Facility Operating License No. NPF-10. Proposed Technical Specification Change No. NPF-10-344 is a request to revise San Onofre Unit 2 Technical Specifications 3/4.3.1, "Reactor Protective System (RPS) Instrumentation" and 3/4.3.2, "Engineered Safety Features Actuation System Instrumentation." The change modifies the channel functional and logic units surveillance test intervals from monthly to quarterly.

Subscribed on this 30TH day of AUGUST, 1991.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Harold B. Ray
Harold B. Ray
Senior Vice President

State of California
County of Orange

On 8/30/91 before me, BARBARA A. McCARTHY, NOTARY PUBLIC personally appeared HAROLD B. RAY, personally known to me ~~(or proved to me on the basis of satisfactory evidence)~~ to be the person~~(s)~~ whose name~~(s)~~ is/~~are~~ subscribed to the within instrument and acknowledged to me that he/~~she/they~~ executed the same in his/~~her/their~~ authorized capacity~~(ies)~~, and that by his/~~her/their~~ signature~~(s)~~ on the instrument the person~~(s)~~, or the entity upon behalf of which the person~~(s)~~ acted, executed the instrument.

WITNESS my hand and official seal.

Signature Barbara A. McCarthy

OFFICIAL SEAL
BARBARA A. MC CARTHY
Notary Public-California
ORANGE COUNTY
My Commission Expires
March 31, 1995

James A. Beoletto
Attorney for Southern
California Edison Company

By: James A. Beoletto
James A. Beoletto

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NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. for a Class 103 License to Acquire, Possess, and Use a Utilization Facility as Part of Unit No. 3 of the San Onofre Nuclear Generating Station	)	Docket No. 50-362 Amendment Application No. 93

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 93.

This amendment application consists of Proposed Technical Specification Change No. NPF-15-344 to Facility Operating License No. NPF-15. Proposed Technical Specification Change No. NPF-15-344 is a request to revise San Onofre Unit 3 Technical Specifications 3/4.3.1, "Reactor Protective System (RPS) Instrumentation" and 3/4.3.2, "Engineered Safety Features Actuation System Instrumentation." The change modifies the channel functional and logic units surveillance test intervals from monthly to quarterly.

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-10/15-344

This is a request to revise Table 4.3-1 of Technical Specification 3/4.3.1, "Reactor Protective Instrumentation" and Table 4.3-2 of Technical Specification 3/4.3.2, "Engineered Safety Features Actuation System Instrumentation."

Existing Specifications:

Unit 2: See Attachment "A"

Unit 3: See Attachment "B"

Proposed Specifications:

Unit 2: See Attachment "C"

Unit 3: See Attachment "D"

1.0 DESCRIPTION

The proposed amendment would revise the Technical Specifications for the San Onofre Nuclear Generating Station Units 2 and 3. Technical Specification 3/4.3.1 and 3/4.3.2 surveillance requirement tables 4.3-1 and 4.3-2, respectively, for the Reactor Protection System (RPS) and Engineered Safeguards Features Actuation System (ESFAS) instrumentation are proposed to be revised. The Channel Functional Tests for the functional units would be revised from monthly to quarterly.

The proposed changes to the Channel Functional Test from monthly to quarterly are based in part on the following:

1. CEN-327, RPS/ESFAS Extended Test Interval Evaluation, May 1986;

2. CEN-327 Supplement 1, RPS/ESFAS Extended Test Interval Evaluation, January 1989; and

3. NRC Safety Evaluation Report (SER) for CEN-327 , November 1989.

Increasing the STI for the ESFAS and RPS instrumentation minimizes potential inadvertent ESFAS actuations and reactor trips during surveillance testing. Also, increasing the STI enhances the operational effectiveness of plant personnel. The amount of time plant personnel spend performing surveillance testing will be reduced. This allows manpower to be used for other tasks, such as plant monitoring.

1.1 RPS

Technical Specification 3/4.3.1 provides instrumentation operability and

surveillance requirements for the RPS to assure that the functional capability is maintained within its safety analysis design. The Technical Specification also assures that the integrated operation of this system is consistent with the assumptions used in the accident analysis.

The RPS instrumentation consists of transmitters, calculators, logic, and other equipment necessary to monitor selected Nuclear Steam Supply System (NSSS) conditions and to effect reliable and rapid reactor shutdown (reactor trip) when monitored conditions approach specified safety system limits. The RPS instrumentation functions to protect the core fuel design limits and RCS pressure boundary from anticipated operational occurrences and certain design basis events.

Technical Specification surveillance requirement 4.3.1.1 and Table 4.3-1 specify the modes and frequency for the performance of the Channel Check, Channel Functional Test, and Channel Calibration for each RPS functional unit. The Technical Specification also defines the number of channels of instrumentation required to be operable for each RPS functional unit. For most instruments, Channel Checks are performed at a shiftly interval, Channel Functional Tests at a monthly interval, and Channel Calibrations at a refueling interval. These surveillance requirements assure that the instrumentation shall be operable.

Technical Specification 3/4.3.1, Table 4.3-1 lists the following functional units for RPS instrumentation:

1. Manual Reactor Trip,
2. Linear Power--High,
3. Logarithmic Power Level--High,
4. Pressurizer Pressure--High,
5. Pressurizer Pressure--Low,
6. Containment Pressure--High,
7. Steam Generator Pressure--Low,
8. Steam Generator Level--Low,
9. Local Power Density--High,
10. DNBR--Low,
11. Steam Generator Level--High,
12. Reactor Protective System Logic,
13. Reactor Trip Breakers,
14. Core Protection Calculators,
15. Control Element Assembly Calculators,
16. Reactor Coolant System Flow--Low,
17. Seismic--High, and
18. Loss of Load.

CEN-327 addressed the Channel Functional Test (CFT) frequency for the functional units above, except for the Manual Reactor Trip, Reactor Trip Breakers, and Seismic--High. The functional units specifically addressed in CEN-327 and the Seismic--High CFT frequencies are proposed to be reduced from monthly to quarterly. The Manual Reactor Trip CFT is currently on a refueling interval and the Reactor Trip Breakers CFT is currently on an 18 month interval. This Technical Specification amendment request does not affect these two functional units.

The Seismic--High functional unit was not explicitly addressed by CEN-327. However, Combustion Engineering has determined that the similarity in the design of the seismic trip function bistable to the Loss of Load trip function bistable would allow the use of the same analysis to justify extending the surveillance interval. Both the seismic trip function and the loss of load trip function operate from a bistable which is a Contact Bistable Trip Unit (CBTU). CBTUs generate a trip signal based on contact operation. These type units do not have trip setpoints and therefore are not affected by drift.

1.2 ESFAS

Technical Specification 3/4.3.2 provides instrumentation operability and surveillance requirements for ESFAS functional units to assure that the functional capability is maintained within its safety analysis design. The Technical Specification also assure that the integrated operation of the ESFAS functional units is consistent with the assumptions used in the accident analysis.

The ESFAS is designed to actuate engineered safeguards equipment when process instrumentation values exceed trip setpoints. The ESFAS actuates responses intended to limit equipment damage, to provide protection for Control Room personnel, to minimize off-site radiation releases, and to mitigate the consequences of postulated accidents.

Technical Specification surveillance requirement 4.3.2.1 and Table 4.3-2 specify the modes and required frequency for the performance of the Channel Check, Channel Functional Test, and Channel Calibration for each ESFAS functional unit. The Technical Specification also defines the number of channels of instrumentation required to be operable for each ESFAS functional unit. For most instruments, Channel Checks are performed at a shiftly interval, Channel Functional Tests at a monthly interval, and Channel Calibrations at a refueling interval. Surveillance requirements assure that the instrumentation shall be operable.

Technical Specification 3/4.3.2, Table 4.3-2 lists the following functional units for ESFAS instrumentation:

1. Safety Injection Actuation Signal (SIAS),
2. Containment Spray Actuation Signal (CSAS,)
3. Containment Isolation Actuation Signal (CIAS),
4. Main Steam Isolation Signal (MSIS),
5. Recirculation Actuation Signal (RAS),
6. Containment Cooling Actuation Signal (CCAS),
7. Loss of Power (Loss of Voltage--LOV),
8. Emergency Feedwater Actuation Signal (EFAS),
9. Control Room Isolation Signal (CRIS),
10. Toxic Gas Isolation Signal (TGIS),
11. Fuel Handling Isolation Signal (FHIS), and
12. Containment Purge Isolation Signal (CPIS).

CEN-327 addressed the CFT frequencies for all the functional units above except

for CCAS, CRIS, TGIS, FHIS, and CPIS. The functional units specifically addressed by CEN-327 and CCAS CFT frequencies are being proposed to be reduced from monthly to quarterly. The CRIS, TGIS, and FHIS CFTs are currently on monthly intervals and the CPIS is currently on a refueling interval. This Technical Specification amendment request does not affect CRIS, TGIS, FHIS, and CPIS.

CEN-327 did not specifically address CCAS, but CCAS is included in this amendment request. The CCAS and SIAS share the same type bistables and are designed similarly. Therefore, the CCAS can be encompassed in the SIAS analysis. This has been verified by Combustion Engineering.

2.0 BACKGROUND

In 1982, Westinghouse and the Westinghouse Owners Group submitted a generic topical report requesting test interval extensions for selected components in the RPS and ESFAS. This request was supported through the use of probabilistic risk assessment methodologies. As a result, the NRC initiated a research project to determine how probabilistic risk assessment methodologies can lead to optimal technical specification surveillance intervals and allowed component outage times. Also, the project evaluated how to grant requests for technical specification relief based on such probabilistic risk analyses.

Following the low power ATWS event at Salem in 1983, the NRC issued Generic Letter 83-28 specifying actions for licensees and applicants. One of these actions was to review the Reactor Trip System (RTS) test intervals to determine if they help achieve high RTS availability. Combustion Engineering (CE), under contract to the CE Owners Group (CEOG), performed an analysis of RTS availability given the 30 day test interval. Sensitivity analyses indicated that the RTS unavailability is insensitive to changes in individual component failure rates. That conclusion affected the RTS test program rationale. Less testing reduced challenges to safety systems and improved plant availability. In January 1985, CE, under contract to the CEOG, began an analysis of the impact of extending the surveillance test intervals for selected components in the RPS and ESFAS. This analysis became CEN-327, RPS/ESFAS Extended Test Interval Evaluation.

In CEN-327, previously developed RPS fault tree models were expanded to cover the effected RPS electronic trip parameters. The new models were then used to determine the RPS reliability for the current and the proposed test interval. The model included: common mode failures, operator errors, reduced redundancy, and random component failures. The analysis intended to justify extending the surveillance test intervals from 30 days to 90 days. Based on the NRC position at that time, the CEOG declared acceptable analysis results if extending the test intervals did not increase the risk to the public (as measured by the core damage frequency). Trip parameter circuits (between the sensors and actuated device) were analyzed assuming a 90 day test interval with staggered testing and a 60 day test interval with sequential testing. Both of these test schemes passed the "no increase in core damage frequency" criteria.

Fault tree models were also constructed for the affected ESFAS signals. Similar to the RPS fault tree models, each ESFAS fault tree model specifically addressed common mode failures, operator errors, reduced redundancy, and random component failures. Once the models were constructed, CE measured the ESFAS reliability assuming the current and proposed test intervals. For ESFAS, CEN-327, Section 5.0, specifically recommended increasing the surveillance interval for the bistables, bistable relays, logic matrix relays, actuation logic circuits and manual actuation devices. However, CEN-327 maintained that the test interval for process measurement sensors and subgroup actuation relays remain the way they are in current Technical Specifications.

The CEOG submitted CEN-327 to the NRC for review in June 1986. The NRC contracted with EG&G Idaho to perform an extensive technical evaluation. EG&G Idaho then submitted their report to the NRC. The NRC after performing additional reviews, prepared a draft Safety Evaluation Report (SER) which concluded that extending the RPS and ESFAS test intervals was acceptable.

While the NRC was inclined to find it generally acceptable to extend the RPS test interval from 31 days to 92 days, with sequential testing, they could not include this in the SER for CEN-327 because CEN-327 recommended more restrictive test intervals for certain trip parameters. However, the NRC proposed to move forward on the SER if CE issued a supplement to CEN-327. The supplement to CEN-327 sent to the NRC on March 3, 1989 presented updated system reliability information for the RPS and recommended a 90 day test interval with sequential testing for RPS.

The SER issued by the NRC on November 6, 1989 found the justifications of CEN-327 and its supplement acceptable. The Staff agreed to allow an increase in the STI for RPS and ESFAS from monthly to quarterly on a sequential test schedule contingent on the licensee substantiating that instrument drift over the increased STI would not cause the setpoints to exceed those assumed in the safety analysis or Technical Specifications.

3.0 DISCUSSION/METHODOLOGY

3.1 RPS/ESFAS Extended Test Interval Evaluation

The SER for CEN-327 reached the following conclusions:

- The fault tree models of the RPS and ESFAS and the data used to quantify them were developed in sufficient detail and logic to allow evaluations of the effects of extended test intervals on RPS and ESFAS unavailability.

- The methodology used to estimate the changes in RPS and ESFAS unavailability and core melt frequency due to test interval changes was adequate.

- The analysis provided sufficient basis for extending the RPS surveillance interval from monthly to quarterly as a result of a reduction in core melt frequency (due to fewer inadvertent scrams) and a "very small" increase in RPS unavailability.

- The analysis provided sufficient basis for extending the ESFAS surveillance interval from monthly to quarterly as a result of a "very small" increase in ESFAS unavailability and core melt frequency.

- The effects of instrument drift <u>had not been considered</u>; therefore, it should be addressed on a plant specific basis. Each licensee should evaluate "as found" and "as left" drift information to confirm that drift occurring over the period of the extended surveillance interval will not cause the setpoint to exceed the allowable value.

The operability of the Reactor Protective System (RPS) and Engineered Safety Features Actuation System (ESFAS) instrumentation and bypasses ensures that:

1) the associated Reactor Trip and Engineered Safety Features Actuation actions perform when the parameter monitored by each channel, or combination thereof, reaches its setpoint,

2) the specified coincidence logic is maintained,

3) redundant design permits a channel to be out-of-service for either testing or maintenance, and

4) sufficient system functional capability is available from diverse parameters.

ESFAS and RPS operability criteria assure the reliability, redundancy and diversity assumed in the facility design for the protection against, and mitigation of, accident and transient conditions.

The surveillance requirements assure the system capability stays comparable to the original design standards. The RPS and ESFAS instrumentation channel functional tests are performed monthly. These surveillances are time consuming. More importantly, they collectively throughout the industry cause many inadvertent reactor trips and engineered safeguards actuations challenging safety systems. Therefore, this high frequency results in an adverse impact on equipment life and unit availability.

The inputs into the RPS and ESFAS are both digital and analog. Calibration of transmitters and signal processing equipment is done on a refueling basis (CRIS, TGIS, and FHIS instrumentation are calibrated on an 18 month interval). In order to accommodate extension of the refueling cycle to 24 months, license amendments were submitted to extend the calibration interval of the RPS and ESFAS transmitters and signal processing information. Amendment 88 to Facility Operating License NPF-10 and Amendment 78 to Facility Operating License 15 transmitted by a NRC letter dated June 8, 1990 documents the acceptance of this

surveillance interval extension (Amendments 78 and 88 are not applicable to CRIS, TGIS, FHIS, and CPIS).

In the NRC SER for Amendment 78 and 88 the NRC stated:

> "However, the bases for the calibration extension for RPS and ESFAS are based in part on the ability of the shift channel checks and monthly channel functional test to identify instrument operability problems in a timely manner. Any future SONGS submittal requesting an extension o of the RPS, ESFAS, and RSI monthly channel functional test must confirm that the bases for the above referenced 24-month calibration interval extension is not compromised."

SCE stated in the PCNs (275 and 280) for these amendments that:

> "...instrument problems, associated with operability were detectable by operations personnel during the shiftly channel checks or during routine monitoring of plant parameters."

In the "Safety Analysis" section of the PCN SCE stated:

> "The surveillance and corrective maintenance history review has confirmed that problems are identified as the result of shiftly Channel Checks and Channel Functional Tests."

The quote from the "Safety Analysis" section should have been written to reflect the same words as in the other sections of the PCN:

> "The surveillance and corrective maintenance history review has confirmed that problems are identified as the result of shiftly Channel Checks and during routine monitoring of plant parameters."

The surveillance history review performed found that the monthly functional tests had not revealed any failures pertinent to the calibration extension. In fact, since the monthly functional test consists of injecting a simulated signal into the RPS/ESFAS logic between the transmitters and signal processing equipment, any failures detected relevant to the channel calibration would be by coincidence and not by design.

The channel checks, however, reveal failure information that could be directly related to the channel calibration. The surveillance interval relative to the shiftly channel checks is not being altered and, therefore, its ability to detect equipment problems is not changed. These shiftly cross channel checks are better suited to detect transmitter calibration problems between refueling calibrations than other types of on-line surveillances.

The monthly functional test interval is being increased to quarterly. The impact of increasing the surveillance interval of the functional test is discussed in CE report CEN-327. Any problems which would have previously been identified during the monthly functional test will now be identified at approximately three months. The problems that may be identified will most likely not effect the channel calibration. Since the quarterly functional test

frequency is still much less than the refueling surveillance frequency, these types of problems, if they occur, will still be identified prior to the refueling interval surveillance regardless of whether the refueling surveillance occurs at 18 month or 24 month intervals.

3.2 PPS Bistable Drift Analysis

The SER regarding CEN-327 required that "the licensees must confirm that they have reviewed drift information for each channel involved and have determined that drift occurring in that channel over the period of extended STI will not cause the setpoint value to exceed the allowable value as calculated for that channel by their setpoint methodology."

The NRC requires that drift information for each channel be reviewed on a plant specific basis. Drift is a change in value of a signal over time, and only applies to analog equipment. The inputs into the RPS and ESFAS are both digital and analog. In the analog channels, the bistable trip converts the analog information into a digital signal. This is done by comparing an analog trip setpoint voltage to a voltage signal from the measuring device. When the process signal exceeds the setpoint voltage, the bistable trip unit changes state and actuates relays. This relay operation is then processed through the PPS logic matrix to develop the coincidence for the appropriate actuations.

The first task in meeting this requirement is to identify the components subject to drift which are affected by the proposed increase in the STI. Then a method must be selected to evaluate the drift experienced for these components. Then the results of the drift evaluation on both a monthly and quarterly basis must be assessed.

Calibration of transmitters and signal processing equipment is done on a refueling basis. The STI for this equipment is not being changed. The STI for the channel functional test of the bistable trip units is, however, being increased from a monthly to a quarterly interval. Therefore, the drift analysis focuses on the analog bistable trip units.

The method of evaluating the suitability of extending the STI was to determine the experienced drift, on a "95/95" basis, of the SONGS Units 2 and 3 PPS bistables. Historically, the NRC has accepted 95% probability and 95% confidence levels as sufficient for safety related instrument setpoints. These levels are recommended in industry standards.

Originally it was planned to utilize the same methods which had been used to evaluate transmitter drift at SONGS and which had been previously reviewed and accepted by the NRC as documented in the SER for Amendments 78 and 88, dated June 8, 1990. However, it became obvious early on that the PPS bistable drift data was not normally distributed. To accommodate a non-normal distribution, it was decided to set arbitrary values for drift which would represent a pass/fail criterion. (This criterion should not be confused with an acceptable value for drift relative to setpoint calculations.) The pass/fail criterion was established so that the data could be characterized by a binomial distribution and then analyzed accordingly. The pass/fail criterion can be adjusted to

reflect a 95% probability of the drift data falling within the bounds at a 95% confidence level.

This pass/fail criterion can then be compared to allowable values for drift contained within setpoint calculations if:

1. the allowed value from setpoint calculations is greater than the pass/fail criterion, and

2. there is a 95% probability that the trip setpoints will be within the pass/fail criterion on a quarterly basis, then extending the STI to quarterly is acceptable.

Bounding values for drift were developed for each model of PPS bistable and the probability that the trip setpoint would be within these bounds was calculated. This resulted in a percentage of the tests that the trip setpoint would fall within these bounding values. To ensure that the probability was conservative, minimum values of the probability were calculated so that there would be at least a 95% confidence that the true probability was greater than the minimum value.

4.0 RESULTS/CONCLUSIONS

4.1 RPS/ESFAS Extended Test Interval Evaluation

The analysis results presented in CEN-327 and CEN-327 Supplement 1 demonstrate that the surveillance test intervals for RPS and ESFAS components can be increased without increasing public risk. In fact, for the test intervals proposed, the overall impact is a slight decrease in public risk as measured by a net decrease in core melt frequency. Extending the test interval does not change the trip per test frequency, but it does reduce the trip per year frequency.

The analyses and conclusions presented in both CEN-327 and its supplement support this license amendment request to extend logic test frequencies. The ESFAS subgroup relay test remains at the current surveillance interval because the CEN-327 analysis did not include those relays. Supplement 1 showed the analysis applied to RPS from sensor (not including the sensor) to CEDM breaker (not including the breakers). RPS logic can be tested through the final contact in the breaker opening logic. A similar test in the ESFAS would start equipment in the plant.

All affected RPS and ESFAS component surveillance intervals except the Reactor Trip Switchgear for the RPS, and the process measurement sensors and the subgroup relays for the ESFAS were affected. The surveillance interval should remain as currently required by the Technical Specifications for the unaffected components.

As previously discussed in Sections 1.1 and 1.2, the Seismic-High trip function and the CCAS signal were not specifically addressed in CEN-327. The seismic trip function is identical to the loss of load trip function in that both functions operate from a contact opened by a signal directly from the sensor. This is called a CBTU type bistable. CBTU type bistables are not subject to drift. The design of the Seismic-High and Loss of Load trip functions are identical except for the auto bypass function and the sensors. The sensors STIs are not being changed. The same is true of the similarities between the CCAS and SIAS. These signals share the same bistables and are designed identically except that the CCAS initiates automatically on a manual SIAS actuation. Based on the above, the increased unavailabilities of the "Seismic - High" and CCAS signals due to extending the surveillance test interval from monthly to quarterly should be acceptable as were the increased unavailabilities of their counterpart signals, "Loss of Load" and SIAS respectively.

4.2 PPS Bistable Drift Analysis

First, it can be concluded that the trip setpoints will be within the pass/fail criterion at least 95% of the time, when the testing is performed quarterly.

The second conclusion that can be drawn from this analysis is that there is a very small (if any) time contribution to the changes in the trip setpoints. If significant time-dependent drift were occurring, the nominal probability of the quarterly data falling within the pass/fail criterion would be significantly less than the monthly values. It was found that the differences between the quarterly and monthly nominal probabilities were small. All of the quarterly probabilities fall within the 95% confidence interval of the monthly probability.

SAFETY ANALYSIS

1. Will operation of the facility in accordance with the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   Increasing the surveillance interval for the RPS and the ESFAS has two principle effects with opposing impacts on core melt risk. The first impact is a slight increase in core melt frequency that results from the increased unavailability of the instrumentation in question. The unavailability of the tested instrumentation translates to a failure of the reactor to trip or a failure of the appropriate engineered safety feature to actuate when required. The opposing impact is the corresponding reduction in core melt frequency that would result because of the reduced exposure to test induced transients.

   Representative fault tree models for San Onofre Units 2 and 3 and the

corresponding core melt frequency increases and decreases were quantified in CEN-327. The unavailability assumption described above includes the increased relay service time (relays are normally energized). The extended surveillance interval was found to result in a net reduction in core melt risk. A lower potential for test induced trips over-shadows negative effects from increasing relay operating time.

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

2. Will the operation of the Facility in accordance with this proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

   Response: No.

   This amendment request does not involve any changes in equipment and will not alter the manner in which the plant will be operated. For this reason, this amendment will not create the possibility of a new or different kind of accident from any previously evaluated.

3. Will operation of the facility in accordance with this proposed change involve a significant reduction in a margin of safety?

   Response: No.

   The proposed changes do not alter the manner in which safety limits, limiting safety system settings, or limiting conditions for operation are determined. Implementation of the proposed changes is expected to result in an overall improvement in safety due to the fact that reduced testing will result in fewer inadvertent reactor trips, less frequent actuation of ESFAS components, and less frequent distraction of operations personnel.

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

SAFETY AND SIGNIFICANT HAZARDS DETERMINATION

Based on the above Safety Analysis, it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10 CFR 50.92; and (2) there is a reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.