

DESCRIPTION OF AMENDMENT APPLICATION AND SAFETY ANALYSIS
AMENDMENT APPLICATION NO. NPF-10-2 OPERATING LICENSING NPF-10

This is a request to revise Appendix "A" Technical Specification 4.8.4.1.

CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES

Existing Specification

See Attachment "A"

Proposed Specification

See Attachment "B"

Reason for Proposed Change

Technical Specifications 4.8.4.1.a.2 requires in part, (a) "For the lower voltage circuit breakers the nominal trip setpoint and short circuit response times are listed in Table 3.8-1," and (b) "Testing of these circuit breakers shall consist of injecting a current in excess of the breakers' nominal setpoint and measuring the response time. The measured response time will be compared to the manufacturer's data to insure that it is less than or equal to a value specified by the manufacturer."

We are proposing to delete the data of part (a) of the Technical Specification above for the reasons discussed below. In the future, this data will be listed in the appropriate station procedures.

Circuit breakers are designed by the manufacturer to respond to an overcurrent condition with an inverse time delay trip; i.e., the larger the overcurrent, the sooner the trip occurs after the overcurrent starts.

Lower voltage circuit breakers are normally "molded case" type breakers with a thermal type trip element. While designed to protect circuits from short circuit conditions, these breakers are not designed to be repeatedly tested at short circuit conditions. They are, however, designed to be tested at some nominal value above the lowest trip setpoint but below the short circuit trip setpoint and will normally respond in accordance with the manufacturer's response time curve.

Therefore, if the breakers are tested at or above this nominal value and they also respond in accordance with the manufacturer's specifications, they properly are considered OPERABLE per the Technical Specifications part "b" above.

The requirement to list nominal trip values which are not necessarily used for testing and to list short circuit response times which are not used at all is of little value. We propose that Specification 4.8.4.1.a.2, sentence three, be deleted, and that the trip values and response times be deleted from Table 3.8-1. We further propose that Technical Specification 4.8.4.1.a.1.b be similarly modified as marked for consistency with 4.8.4.1.a.2.

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Safety Analysis

This amendment application clarifies the required method of testing the Containment Penetration Conductor Overcurrent Protective Devices but does not alter the intent of the Technical Specification nor does this clarification require any alteration of the physical station.

Accordingly, it is concluded that: (1) the amendment application does not involve an unreviewed safety question as defined in 10 CFR 50.59, nor does it present significant hazard considerations not described or implicit in the Final Safety Analysis; (2) there is reasonable assurance that the health and safety of the public will not be endangered by the amendment; 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.

LP:3907