# DESCRIPTION OF PROPOSED CHANGE NPF-10-46 AND SAFETY ANALYSIS
## OPERATING LICENSE NPF-10

This is a request to revise Appendix "A" Technical Specification 3.3.4.

Turbine Overspeed Protection

Existing Specification

Applicability Modes 1, 2, and 3

Proposed Specification

Applicability Modes 1, 2*, and 3*

*With any main steam isolation valve or its bypass not fully closed.

Reason For Proposed Change

On October 6, 1982 we anticipate the need to enter MODE 3 to resume startup testing. The turbine control valves are presently undergoing repairs which cannot be completed by this date. Technical Specification 3.3.4 presently would prohibit entry into MODE 3 with these turbine control valves inoperable. This proposed change will allow entry into MODES 3 and 2 while preventing the possibility of turbine overspeed by requiring that the Main Steam Isolation Valves and the Main Steam Isolation Valve Bypasses remain closed while the Turbine Overspeed Protection System is inoperable.

Safety Analysis

The basis for the turbine overspeed protection system limiting condition for operation is to ensure that the probability of turbine missles being generated is acceptably low. The original Limiting Condition for Operation (LCO) requires isolation of steam from the turbine by closure of the turbine stop or control valves or the MSIV and Bypass MSIV valves when the overspeed protection system is inoperable. The revised LCO which allows continued operation and mode changes with the MSIVs and MSIV Bypass valves shut when the overspeed protection system is inoperable provides protection identical to that in the original specification.

Accordingly, it is concluded that: (1) Proposed Change NPF-10-46 does not 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 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.

LP:5808