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 931114, containing description of changes, tests &
 experiments, including summary of safety evaluation of each.

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United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
REPORT OF CHANGES PURSUANT TO 10 CFR 50.59

Gentlemen:

The enclosure to this letter provides the report of changes to the H. B. Robinson Steam Electric Plant, Unit No. 2 as described in Amendment 12 to the Updated Final Safety Analysis Report. The enclosure is submitted as required by 10 CFR 50.59(b)(2) and contains a brief description of any changes, tests and experiments, including a summary of the safety evaluation of each. This report provides those changes made operational through November 14, 1993.

Questions regarding this matter may be referred to Mr. K. R. Jury at (803) 383-1363.

Very truly yours,

R. M. Krich
Manager, Regulatory Affairs

JSK:lhg
Enclosure

- c: Mr. S. D. Ebnetter, Regional Administrator, USNRC, Region II
- Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP
- Mr. W. T. Orders, USNRC Senior Resident Inspector, HBRSEP

SUMMARY OF CHANGES

Modification 972: Service Water Chemical Treatment System

DESCRIPTION: DCN 8 to this modification changes swing check valves to lift check valves and reduced the number of check valves in each line from two to one.

SAFETY EVALUATION SUMMARY: This work did not change the original design intent or operation of the system. The change from swing check valves to lift check valves will enhance system operation, reduce back leakage and reduce maintenance on the system. The number of check valves in each injection line is reduced from two to one; however, there is no loss of boundary integrity since check valves in the Service Water system are defined as passive elements and a single active failure of a check valve need not be considered. The new check valves are seismically supported. The Updated Final Safety Analysis Report (UFSAR) has been revised to reflect the changes.

Modification 1021: Turbine Building Service Water Isolation

DESCRIPTION: This modification revises the automatic closure circuit of the Service Water Supply Valves (V16A, B, & C) to the Turbine Building. This change is required since the existing circuit for automatic Turbine Building service water isolation can be disabled by a single failure of the Safeguards System DC power supply to a single relay control power circuit.

SAFETY EVALUATION SUMMARY: In the event of the single failure in the Safeguards System DC power supply, the possibility exists for two Service Water pump operation supplying a system requiring more flow than the Service Water pump combined rated capacity. This also causes Service Water pump runout past the design operating point on the pump curves increasing their susceptibility to damage due to higher fluid velocities, NPSH requirements, and vibration levels. Procedural provisions exist for operator intervention to manually isolate the Service Water supply to the Turbine Building or start additional Service Water pumps, if available, but delays could increase the probability of pump damage. Reduced flows to accident loads will occur only during the loss of an Emergency Bus, or a related malfunction, causing only two Service Water pump operation coincident with the failure of the Turbine Building supply header to be isolated. The effect on components subjected to the flow reduction in question had been determined to not result in unacceptable consequences during the short time prior to operator intervention.

The modification provides additional protection for the Service Water pumps and reduces the need for operator intervention. The UFSAR has been revised to reflect the changes.

Modification 1074: Electrical Penetration Replacement - Phase II

DESCRIPTION: This modification performed work associated with the replacement of electrical penetrations including transferring of cables to the new penetrations, installation of new penetrations, sparring of abandoned cables, modification of supports and raceways, cable tray upgrades, etc.

SAFETY EVALUATION SUMMARY: The modification was performed in full compliance with the requirements in IEEE Standard 317-1983, "Standard for Electric Penetration Assemblies in Containment Structures for Nuclear Power Generating Stations". The new penetrations are of a newer technology and design which will offer advantages over the existing penetrations as well as improved environmental qualification performance. The UFSAR has been revised to include changes in combustible loading due to this modification.

Modification 1086: Relocation of SI-858A, B, & C

DESCRIPTION: This modification relocates and resizes safety valves SI-858A, B, & C. The valves are moved to the top of the Safety Injection Accumulators.

SAFETY EVALUATION SUMMARY: The modification does not change the design basis other than to reflect that the primary flow medium for the valves will be nitrogen. The safety valve set pressures and operating pressure of the Safety Injection Accumulator remain the same.

The nitrogen flow capability is decreased to minimize the possibility of inadvertently lifting the safety valves during a rapid repressurization of the Accumulators. The addition of a filter and a valve, NS-141 along with 1/2" piping will limit the nitrogen flow rate through the PCV-937 bypass line. The UFSAR has been revised to reflect the change.

Modification 1095: Battery Capacity/Relocate Chemical Mixing Tank

DESCRIPTION: This modification removes and relocates the Chemical Mixing Tank and associated piping from the Boric Acid Storage Tank Area (elevation 246') to the Boric Acid Storage Tank Area (elevation 226').

SAFETY EVALUATION SUMMARY: The modification was performed in support of the then-planned project to increase the station battery capacity. The modification does not impact the ability of the Chemical Mixing Tank to deliver process water to the charging pumps. The tank is pressurized by Primary Water to deliver its contents and is not gravity fed. The overall pressure drop through the new piping is negligible based on the existing orifice flow rate of two gallons per minute. The new piping will be designed, constructed and tested to assure a leak-tight pressure boundary to maintain integrity during and after seismic events. The UFSAR has been revised to reflect the changes.

Modification 1097: Hydrogen Post-Accident Venting / Vent Valve Operation

DESCRIPTION: This modification entails the replacement of the Penetration Pressurization System supply valve, EV-1721A to the Containment Pressure Relief Penetration, and includes certain improvements to the associated piping, control circuitry, and power supply cabling.

SAFETY EVALUATION SUMMARY: The piping and valve installation were designed to ensure that the structural integrity is maintained and seismic and environmental qualification requirements are met. The control circuitry and power supply cables were designed in accordance with the applicable design guides, codes and standards as documented by the control circuit loading calculation maintained for the Plant. This safety related modification was performed to ensure that the system would perform its intended function and to resolve concerns related to the existing, misapplied valve. The UFSAR has been revised to reflect the changes in fire loading which resulted from the modification.

Modification 1098: Source Range Pre-Amplifier Replacement

DESCRIPTION: This project replaced the existing source range monitor pre-amplifiers with a newer design.

SAFETY EVALUATION SUMMARY: The new pre-amplifier is a model which is physically compatible with the existing equipment, manufactured by the original vendor, and provides greater noise immunity. The new pre-amplifier meets or exceeds specifications for the original device with one exception: the maximum input cable length for the original device was 250 feet, the specification for the replacement is 200 feet. The existing input cable length is approximately 125 feet, therefore this is not a critical design input. No system operation mode or reliability factor is affected. The UFSAR has been revised to reflect the change.

Modification 1099: Switchyard Voltage and LT-462 Indication Upgrade

DESCRIPTION: This modifications installs indicators on the control room control board for the 230 KV switchyard north and south bus voltage and the 230 switchyard KV north and south bus voltage setpoint, adds data points to ERFIS for the 115 KV and 230 KV switchyard span bus voltages, and pressurizer level (LT-462), and associated hardware and wiring changes.

SAFETY EVALUATION SUMMARY: The new indicators provided by this modification improve the present means of monitoring bus voltages. These Bargraph/Digital indicators provide clear distinction between loss of indicator power, loss of input signal to indicator and zero indication. The indicators have been procured as safety-related to match the quality requirements of the existing indicators on the control board even though the function

of the indicators added by this modification is non-safety related. The wiring changes associated with the ERFIS input are non-safety related. The changes have been evaluated to meet appropriate requirements fire protection, human factors, loop accuracy, etc. The UFSAR has been revised to reflect the increased fire loading created by the modification.

Modification 1106: CVC 411C Check Valve Removal

DESCRIPTION: This modification rerouted the CVCS charging Pump Seal Drain Line to enter at the top of the collection tank and remove check valve CVC-411C.

SAFETY EVALUATION SUMMARY: This modification was performed to increase the efficiency of the system. The change will allow liquid to enter the tank from the top thereby eliminating a trap in the system and allowing full unrestricted flow. The function of the system is unchanged, but the potential for line blockage will be reduced. (Blockage has occurred in the past; clearing the line resulted in some radiation exposure.) The UFSAR has been revised to reflect the change.

Modification 1107: Upgrade of Recirculation Lines of AFW Pumps

DESCRIPTION: This modification replaced existing orifices in the AFW pump recirculation lines and adds and revised valving to allow independent isolation of each orifice. It also rerouted the motor driven AFW pump common recirculation header to ease maintenance of the motor driven AFW pumps and motors.

SAFETY EVALUATION SUMMARY: The existing orifices were vulnerable to deformation when exposed to the maximum differential pressure across the plates. The new orifices are designed and constructed to withstand the pressure without deformation while maintaining the respective pump minimum recirculation flow required to protect the pump. Rearrangement and addition of valving will allow independent isolation to enhance the maintenance and inspection of the orifices. Independent isolation was not possible with the existing system; this modification provides a significant enhancement in that inspection and maintenance will be possible while the plant is operating. All piping and valves are replaced with like materials and meet applicable requirements. Hanger and supports will meet seismic qualification requirements. Consideration has been given to water chemistry and erosion concerns, and insulation and freeze protection is provided as appropriate. The UFSAR has been revised to reflect the changes.

Modification 1113: Service Water Penetrations

DESCRIPTION: This modification replaced the existing 304L stainless steel liners in the Service Water piping at containment penetrations P-49 through P-56 with AL6XN material. The modification also moved vent valves SW-232, 234, and 237 on the nearest elbow. The damaged bellows element of the sleeve expansion joint at containment sleeve S-5 in the pipe alley was also replaced.

SAFETY EVALUATION SUMMARY: Replacement of the existing stainless steel with AL6XN will improve the quality of the Service Water system, since the AL6XN is better able to resist microbiologically induced corrosion which has attacked the system. Replacement will allow the system to continue to perform its intended function. The UFSAR has been revised to reflect the use of this material.

Modification 1131: Control Room AC Lighting Improvement

DESCRIPTION: This modification replaced the direct illumination fluorescent fixtures in the Control Room with indirect illuminating fluorescent fixtures and removed the suspended ceiling. The purpose was to eliminate significant lighting intensity variation and glare in the Control Room.

SAFETY EVALUATION SUMMARY: The Control Room AC Normal and Emergency Lighting System is not safety-related and is not required to function in order to support the safe shutdown of the plant. It is seismic category II and is connected to the existing seismic ceiling. The design prevents the equipment from the individual fixtures from falling to the floor in a seismic event. The modification had been planned for implementation during plant shutdown conditions and will not impact plant safety. The amount of combustible material has been reduced and the UFSAR has been revised to reflect the reduction.

Modification 1133: Replace 230 KV Generator Breakers

DESCRIPTION: This modification included work in support of the replacement of the 230 KV breakers in the switchyard, specifically installation of two new 230 KV breakers for the main generator, analysis of DC power for tripping and closing the generator breakers, removal and relocation of the existing supervisory cabinet, relocating of startup transformer circuits and other 115 KV circuits, and associated work.

SAFETY EVALUATION SUMMARY: There will be no changes in the functional design of the switchyard and circuits affected by this modification are tested to ensure that all circuits are conducted properly. Failure of the 230 KV circuit breakers are not considered in the UFSAR accident analyses. The UFSAR has been revised to reflect changes in fire loading as a result of this modification.

Modification 1134: Safety Injection Line Pipe/Strainer

DESCRIPTION: This modification installed strainers in the recirculation line of each Safety Injection pump to reduce the probability that the pump will experience restricted flow conditions due to a plugged recirculation orifice. The strainer was added to Safety Injection pump "C" during the 1993 refueling outage. The strainers were added to the "A" and "B" pump during a previous outage.

SAFETY EVALUATION SUMMARY: This modification was initiated because the Safety Injection pumps changed performance, due to an undetected fault, between two very closely spaced surveillance tests from acceptable recirculation flow to unacceptable recirculation flow. The purpose of the strainers is to protect the Safety Injection pumps' recirculation orifice from plugging which protects the pump from damage during operation under no flow conditions. The UFSAR was revised to reflect the addition of the strainer.

Modification 1142: Relocation of SI-857B Safety Relief Valve

DESCRIPTION: This modification provided for the installation of safety relief valve SI-857B inside containment on cold leg injection line SI-64 and repositioning the SI-870 valves to the normally "Closed" position and the SI-867 valves to the normally "Open" position. The SI-857B valve provides overpressure protection to the class 1500 piping between the SI-870 valves and the SI-868 valves.

SAFETY EVALUATION SUMMARY: This modification provides overpressure protection to a portion of the Safety Injection system and allows repositioning of containment isolation valves to their original position. The modification does not change assumptions or initial conditions regarding postulated accidents. The safety relief valve setting is below the maximum discharge pressure for the Safety Injection pumps, thereby eliminating the possibility of spurious operation. Discharge of the valve is routed to the Pressure Relief Tank located inside containment. The valve and associated piping are mechanically qualified for their application; requirements are met for safety related equipment and single failure criterion. The UFSAR has been revised to reflect the changes.

Modification 1145: FW-V2-6A Cable Replacement

DESCRIPTION: This modification installed a new, larger feeder cable, in existing trays, to the operator motor for Feedwater Block Valve FW-V2-6A

SAFETY EVALUATION SUMMARY: The Feedwater Block Valve isolates the discharge of the Main Feedwater Pumps from the steam generators. The valve is driven by a Limitorque Type SMB-2 motor operator and receives a Safety Injection signal to close which provides isolation of the main feedwater when auxiliary feedwater is required. The new

cable is installed to ensure that the operator motor receives adequate voltage during degraded voltage conditions. Adequacy of the cable has been ensured by a cable sizing calculation and MOV testing will ensure that the valve operator continues to meet design requirements. The UFSAR has been revised to reflect the change in fire loading as a result of the modification.

Modification 1149: Turbine Redundant Overspeed Trip System (TROTS)

DESCRIPTION: This modification removed the TROTS components (solenoids and piping) which were abandoned in place after Modification 965 electrically disabled the system.

SAFETY EVALUATION SUMMARY: This modification removed unused, abandoned equipment which served no function in the plant. No impact on any plant system has been created. The UFSAR has been revised to reflect the changes.

Modification 1154: Primary Sampling Valve Addition

DESCRIPTION: This modification adds two normally closed 1/2" valves to the primary sampling system to provide additional assurance that reactor coolant does not leak past the Primary Sampling System containment valves PS-965E & F to the Post-Accident Sampling System, to the Residual Heat Removal (RHR) System through the PS-RHR sample line or to the Primary and Makeup water system. Drawings are modified to show the new valves, and existing valve, V-4187, as normally closed.

SAFETY EVALUATION SUMMARY: The valves involved in this modification are non-safety related as is the portion of the system in which they are installed. Severe service, however, was assumed in the selection of components, and materials compatibility was considered. The modification was evaluated as not needing additional structural support. Although the number of potential leak paths is increased by installation of additional valves, system integrity will be assured by hydrostatic testing prior to system operability. The UFSAR has been revised to reflect the modification.

Temporary Modification 93-715: Installation of Gauges in EDG Air Start Strainers

DESCRIPTION: This temporary modification added a temporary Data Acquisition System and associated instrumentation to monitor the starting parameters of both EDGs "A" and "B".

SAFETY EVALUATION SUMMARY: This modification was performed to gather troubleshooting data for the air start system of the Emergency Diesels. Engine starting is accomplished by injecting compressed air in the pistons in their proper firing order. The

addition of the pressure gauges and associated valves do not prevent the diesels from having sufficient capacity to start and run, but aids in evaluating any possible air start problems. The seismic integrity and qualification of the piping and components in the system required for Class I systems is not degraded. The Data Acquisition System is powered by tapping into the AC emergency lighting circuits. The AC lighting system and their associated power sources are not required to be operable during post-fire conditions and there is not impact on post-fire safe-shutdown capability. The UFSAR has been revised to reflect the changes in fire loading.

Engineering Evaluation 92-045: Safety Injection Pump Casing Replacement

DESCRIPTION: This evaluation addressed the replacement safety injection pump casings. The original pumps were fabricated under ASME Section VIII and Hydraulic Institute Pump Standards. The replacement casings and hardware have materials upgrade along with fabrication in accordance with ASME Section III, division 1 criteria.

SAFETY EVALUATION SUMMARY: The new casings, with the original pump internals will meet the conditions of fit, form and function of the original pumps with an increased margin of safety. The increase margin of safety results from specifying new casings and fastener materials with a higher yield strength. The UFSAR has been revised to reflect the change.

Engineering Evaluation 92-064: Positive Sealing of Penetrations P66 and P72

DESCRIPTION: This effort evaluates the work required to insure positive sealing of lines associated with containment penetrations P66 and P72. These lines have been previously abandoned. Welded caps have been provided for these lines.

SAFETY EVALUATION SUMMARY: The lines associated with these penetrations have been previously abandoned, serve no active purpose, and are isolated by locked closed valves. These lines are open to containment atmosphere and could communicate containment conditions to the valves. Local leak rate testing had been required. The positive seal installed on the lines will create a closed system inside containment. The caps and welds are designed to meet or exceed the external pressure and temperature equal to the containment design pressure and temperature and meet or exceed the capability of the lines to withstand the post-accident environment.

Engineering Evaluation 92-090: Evaluation of Abandoned Cables Inside Containment

DESCRIPTION: This evaluation provides the acceptance basis for the abandoning-in-place of 37 Belden 8424 communication and instrumentation cables and one vinyl-shielded cable in the containment general area.

SAFETY EVALUATION SUMMARY: The ignition of these cables is not considered credible due to the determinated/de-energized status of the circuits, the physical location of these cables away from areas with highly concentrated combustible loadings and the existing fire detection and suppression features in the containment. Redundant safe shutdown trains will not be simultaneously affected by a postulated fire. The UFSAR has been revised to include the additional combustible loading resulting from these cables.

Engineering Evaluation 93-152: Temporary Modification 93-731 Made Permanent

DESCRIPTION: This evaluation was performed to make a temporary modification permanent. The modification provides a jumper between the CVCS and RCS to allow a pressurized sample to be obtained. It has been determined that a sample of the CVCS letdown upstream of the CVCS demineralizers gives the same results as an RCS hot leg sample, except that the CVCS sample line does not allow for a pressurized sample to be obtained, needed for dissolved gas analyses. Use of this alternate means for obtaining RCS samples will allow for the Primary Sampling system isolation valves to remain closed during normal operation and for degradation of these valves to be minimized.

SAFETY EVALUATION SUMMARY: The modification allows for additional flexibility in sampling. The jumper is provided with sufficient structural support to preclude compromise of Q components. The jumper constituents meet the same codes, standards and NRC guidelines met by comparable portions of the existing system. Operating procedures have been revised to address every Primary Sampling system function to assure proper and safe performance. The changes have been appropriately located in the UFSAR.

Engineering Evaluation 93-156: Deletion of HVH-1 Through HVH-4 Prefilters During Operating Cycle.

DESCRIPTION: This evaluation evaluates and justifies the temporary removal of HVH-1,-2,-3, and -4 prefilters based on the performance of additional testing and inspection to verify that HVH performance is satisfactory.

SAFETY EVALUATION SUMMARY: The prefilters were installed upstream of each HVH coil. The filters are non-Q and perform no safety related function; however, they keep the cooling coils clean during normal operation to assure the HVH units can perform their intended function. Removal of the filters is required to eliminate the potential for blockage of the recirculation sump strainers, piping, and safety related pumps during a postulated LOCA. Removal of the prefilters will require additional periodic surveillance and testing of the HVH units to assure they maintain their heat removal capacity required for accident conditions. The UFSAR has been revised to reflect the removal of the prefilters.

Engineering Evaluation 93-172: Temporary Modification 93-708 Made Permanent - Steam Generator "C" Blowdown Sampling Alternate Flow Path

DESCRIPTION: This modification installed an alternate Steam Generator "C" Blowdown sample flow path which bypasses FCV-1935 A & B and ties into the Secondary Sampling System just upstream of the Steam Generator "C" Blowdown Sample Cooler. This flow path returns R-19C and the in-line chemistry monitoring system to operable status and manual sampling is no longer required.

SAFETY EVALUATION SUMMARY: Steam Generator "C" Blowdown Sample valves had been placed in the closed position due to leakage from the Isolation Valve Seal Water system. The alternate sample flow path was installed to return the blowdown radiation monitor R-19C to operable status. For sample analysis purposes, the alternate sample line is equivalent to the original. The alternate line constituents meet the same codes, standards, and guideline met by comparable portions of the original line. Revised operating procedures address the operation of the alternate line and secondary Sampling System balance. The UFSAR was revised to reflect the addition of the alternate line.

Engineering Evaluation 94-002: Diesel Generator Room Fire Doors

DESCRIPTION: This evaluation justifies operation with Fire Doors 23 and 24 closed.

SAFETY EVALUATION SUMMARY: The automatic closure feature of Diesel Generator Room Fire doors 23 and 24 have exhibited unreliable closure and have been declared inoperable. The doors have been manually closed and will be monitored each shift. The doors will continue to function to contain fire hazards and will keep the CO₂ fire suppression system effective. A review of plant experience provides assurance that the doors will remain closed. Closing the doors will not change the existing arrangement for Auxiliary Building Ventilation, nor does it reduce compliance with NFPA Codes for Carbon dioxide Systems (NFPA 12) or Standard for Fire Doors and Windows (NFPA 80). The UFSAR has been revised to reflect the change.

Cycle 16 Reload

DESCRIPTION: The reload for Cycle 16 represents a change in core configuration relative to the previous operating Cycle.

SAFETY EVALUATION SUMMARY: The Cycle 16 core has been verified to be in compliance with all required neutronic and fuel mechanical safety analyses, and the safety analyses in Chapter 15 of the UFSAR have been reviewed and determined to bound the Cycle 16 core or they have been reanalyzed to re-establish bounding results. The UFSAR has been revised to reflect changes resulting from Cycle 16.

Meteorological System Upgrade

DESCRIPTION: The project provided upgrade and replacement of the existing, obsolescent, meteorological equipment.

SAFETY EVALUATION SUMMARY: The purpose of the meteorological program is to measure and display meteorological data during normal and accident conditions. The system has no effect on the design, operation, and maintenance of systems important to safety. The system continues to measure variables required to comply with Regulatory Guide 1.97 and the requirements of Regulatory Guide 1.23 are also met. No changes are made to the meteorological program that would decrease data recovery rates or data availability. The UFSAR has been revised to reflect the changes.

Construction Work Package 744

DESCRIPTION: This change allows the storage of an additional 1894 cubic feet of contaminated lumber to be stored in the Radwaste Building. The additional materials bring the combustible loading to 240,000 BTU/sq. ft. with an equivalent fire severity of 3 hours.

SAFETY EVALUATION SUMMARY: All changes are confined to a single item, storage of contaminated lumber within the Radwaste Building, with an increase in combustible loading. The storage location is in accordance with the requirements of BTP APCSB 9.5-1, Appendix A, Section D.14, and meets the fire detection, fire suppression, and fire barrier criteria for radwaste buildings. The additional combustibles in designated storage locations will not cause potential single failures to become common mode failures, nor cause events previously considered incredible to become credible. There will be no adverse impact on safety-related equipment. The UFSAR has been revised to reflect the changes.

OP-202, Revision 28, Safety Injection and Containment Vessel Spray

DESCRIPTION: This procedure revision changed the normal position of valve SI-859P from locked open to locked closed.

SAFETY EVALUATION SUMMARY: This change was implemented to resolve a concern identified during the development of the Containment Integrity Design Basis Document. The non-Q portion of piping sections between valves SI-898F, SI-895K, and SI-895U may be subjected to system pressure via SI miniflow lines when the SI system is placed in a long-term recirculation mode with SI-856A and SI-856B closed. To avoid a possible LOCA or expulsion of highly contaminated inventory outside the containment should this section of piping rupture, valve SI-859P will be maintained locked closed. The UFSAR has been revised to reflect the change.