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SUBJECT: Submits changes,tests & experiments for Unit 2,per 10CF50.59(b)(2).

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Robinson File No.: 13510H
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United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 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:

Carolina Power & Light (CP&L) Company submits the enclosed report in accordance with 10 CFR 50.59(b)(2), "Changes, Tests and Experiments," for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. The enclosed report provides a brief description of changes, tests and experiments that were implemented pursuant to 10 CFR 50.59 between June 21, 1995, and October 20, 1996. A summary of the safety evaluation for each item is also included in the enclosed report. This report is being submitted by April 21, 1997, as required.

If you have any questions concerning this matter you may contact me or Mr. H. K. Chernoff of my staff at (803) 857-1437.

Very truly yours,

Jerry M. Wilkerson

T. M. Wilkerson
Manager - Regulatory Affairs

JSK/jsk

Enclosure
c: Mr. B. B. Desai, USNRC Senior Resident Inspector, HBRSEP, Unit No. 2
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H. B. Robinson Steam Electric Plant, Unit No. 2
Changes Pursuant to 10 CFR 50.59

Engineering Services Request (ESR) 94-00520

Description

This project created a new entrance and exit for the Radiation Control Area (RCA) that is used for daily operation and maintenance of the equipment located in the Reactor Auxiliary Building and the Containment Building. The RCA entrance is moved to the turbine building, and it occupies the space where hot and cold laboratories, the counting room and first aid room were formerly located. A new lighting panel is installed to provide power for lighting fixtures and receptacles in the new entrance.

Summary of Safety Evaluation

This modification does not interface with accident mitigating or post-accident monitoring equipment, and does not affect any safety-related equipment or systems. The modification affects the Reactor Auxiliary Building structure in that a new seismic category I wall and door are installed; however, there is no increase in the postulated on-site or off-site dose. Since there is no interface with safety-related equipment or components, and no direct interface with safety-related operating systems there, is no possibility of a new or different type of accident. The modification does not affect any design or operating limits related to Technical Specifications (TS). There is no reduction in the margin of safety.

ESR 95-00826

Description

This activity replaces the steam generator blowdown local differential pressure indicators with flow transmitters and routes the output to the Emergency Response Facility Information System (ERFIS) for use in calorimetric calculations.

Summary of Safety Evaluation

The new instruments are equivalent in function to the existing instrumentation, except for the transmission of a signal to ERFIS. They do not perform a safety function, and are not addressed in the Updated Final Safety Analysis Report (UFSAR) safety analyses. The modification does not impact the margin of safety, and does not involve an unreviewed safety question.

ESR 94-00668

Description

The "B" Waste Evaporator has been abandoned and has been replaced by the skid mounted Waste Water Demineralization System (WWDS). This activity changes the status of the WWDS to that of permanent plant equipment and provides revisions to the UFSAR to reflect the status.

Summary of Safety Evaluation

The WWDS is a subsystem of the Liquid Waste Disposal System. The WWDS is not safety-related and cannot contribute to the initiation of an analyzed accident, nor is it used in any way to mitigate the consequences of an accident. The WWDS has been in operation since 1988 in accordance with approved plant procedures. Since this system is not safety-related, and is located in a room with no safety-related equipment, there is no possibility or consequences associated with a malfunction of equipment important to safety. Credible accidents different than those analyzed in the UFSAR cannot occur due to the change in status of the WWDS to permanent plant equipment, nor is there a reduction in the margin of safety as defined in the basis to the TS.

Condition Report (CR) 96-00548

Description

This activity removes the "locked open" (i.e., "l. o.") designation from Demineralized Water (DW) valve 212 in UFSAR figure 10.1.0.5.

Summary of Safety Evaluation

The primary purpose of DW - 212 is to throttle demineralized water flow to the Condensate Storage Tank. The valve is currently governed by procedural controls and does not meet plant criteria for requiring a lock. The removal of the "locked open" designation will not change the function of the valve or the existing safety margins. An unreviewed safety question was not determined to exist.

CR 96-00873

Description

CR 96-00873 identified that Engineering Evaluation (EE) 93-156 justified the removal of the Containment Air Recirculation Cooling System roughing filter, but the appropriate revision to the UFSAR had not been completed.

Summary of Safety Evaluation

The roughing filters are fiberglass filters that are intended to operate only during normal operation of the coolers. During accident mitigation conditions the filters are bypassed. The filters are not safety-related and do not provide an accident mitigation function. Removal of the filters does not have an adverse effect on the design basis requirements of the containment Air Handling System. Since these filters are not necessary for normal or for post-accident operation, their removal is justified. Removal of the filters does not diminish the margin of safety, and will not impact the initiation of accidents. In fact, the removal is intended to eliminate a potential source of containment sump blockage, thereby ensuring that the Residual Heat Removal will remain capable of performing its accident mitigating function.

ESR 95-00186

Description

This activity changes the flow instrumentation used to measure primary water flow to the boric acid make-up system.

Summary of Safety Evaluation

The new flow instrumentation is functionally equivalent to the existing instrumentation. The new instrumentation is seismically qualified to perform its function as a pressure boundary. The instrumentation is not addressed in the UFSAR accident analyses, and the design of this modification does not contradict, decrease the conservatism, decrease the requirements of, or change the assumptions, of the TS Bases.

Annunciator Panel Procedure (APP) - 005

Description

License Amendment 167 provided a Limiting Condition for Operation to provide for temporary conditions in which the Full Length Control Rod Insertion Limits are exceeded due to automatic plant responses or conservative operator actions. Implementation of this license amendment involves a change to a procedure described in the UFSAR, in that the operator will take action to restore the rods to above the alarm setpoint within one hour or within the time specified by the axial power distribution methodology, whichever is sooner.

Summary of Safety Evaluation

Implementation of this change does not physically change the design or performance of the nuclear steam supply system, including the control rods and their supporting equipment. Violation of the rod insertion limits is not the initiator of any analyzed UFSAR accident. The operating environment is not affected and no additional loads are imposed. This change is consistent with the improved Standard Technical Specifications. The time period during which the control rod insertion limits are exceeded is sufficiently short that simultaneous occurrence of an independent accident has an acceptably low probability. This is a temporary condition that is not required to be analyzed in combination with other independent systems. An unreviewed safety question has been determined not to exist, and review and approval of this change has been performed by the NRC, de facto, by the issuance of Amendment 167 to the Operating License.

ESR 96-01046

Description

A section of covered walkway from the existing Radiation Control Area Processing Building to a point adjacent to the Flash Tank, where the walkway approaches the Containment wall, has been removed.

Summary of Safety Evaluation

This modification does not directly interface with any accident detection, mitigating, or post-accident monitoring equipment, and does not result in a change to any on-site or off-site dose rates. There is no impact on emergency core cooling equipment and only affects non-safety related equipment and structures.

ESR 95-00929

Description

This activity provided an evaluation to allow either Heating and Ventilation Air Handling (HVH) Room Cooler - 8 A or HVH - 8B, in the Residual Heat Removal (RHR) pump room to be out of service for a 72 hour duration.

Summary of Safety Evaluation

The RHR pump room coolers are provided to ensure that the RHR pumps can perform their design functions when needed. The room coolers are not involved in accident initiation sequences, and no physical equipment changes are involved that could result in a new accident sequence. Analysis has demonstrated that the RHR pumps can fulfill

their design function with one HVH room cooler out of service for 72 hours. The activity does not create the possibility of any new failure modes, and analysis has demonstrated that the temperature in the RHR pump room will remain well below the design basis temperature.

ESR 95-00065

Description

This activity replaces the "C" Instrument Air Compressor with a new rotary air compressor.

Summary of Safety Evaluation

This modification replaced the existing equipment with similar, more reliable, equipment. The replacement of "C" Instrument Air Compressor does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this replacement.

Change to Quality Assurance Program

Description

This activity consists of a change to the Quality Assurance program that was evaluated and found not to decrease the effectiveness of the Quality Assurance program. The activity consists of changes to UFSAR sections 1.8 and 17.3 to allow the storage of records and documents on optical disk, and clarifies that for magnetic tape and other electronic media, dual storage as provided for in ANSI N45.2.9, 1979, paragraph 5.6.2 may be used. The commitment to Regulatory Guide 1.88 is withdrawn.

Summary of Safety Evaluation

The change is administrative in nature, does not impact plant equipment in any way and deals only with storage of records. Due to the administrative nature of the change and the lack of impact or interface with plant equipment or operation, an unreviewed safety question was determined not to exist.

Generic Issues Document 90-181, Revision 1

Description

This change is a revision to the UFSAR incorporate corrections that were identified in the preparation of Generic Issues Document 90-181, revision 1, "Containment Isolation." Changes include the addition of Penetration P-28 as an exception to Class 1 requirements, deletion of certain relief valves and test valves as containment isolation valves, designation of the Main Steam Isolation Valve (MSIV) above and below seat drain valves as normally "locked closed," designation of Safety Injection (SI) valves 870-A and 870-B as normally closed, and revision of barriers for abandoned penetrations P-66 and P-72.

Summary of Safety Evaluation

This change relates to the identification of the containment isolation barriers. Valve alignments, equipment operation modes, operating procedures, general procedures and end path procedures are essentially unchanged. The change does not compromise the fission product barriers or adversely impact containment integrity. Two redundant barriers are identified for each penetration. Failure modes and failure positions of the isolation valves have not changed, and automatic trip valves retain their automatic trip features. The change does not increase allowable leakage from the containment. Therefore, since operational and failure modes are unchanged and allowable leakage is not increased, an unreviewed safety question was determined not to exist.

CR 96-00803

Description

This change revises the UFSAR to delete reference to a non-existent restricting orifice in the Penetration Pressurization System (PPS) line to the personnel air lock.

Summary of Safety Evaluation

The function of the restricting orifice, if it had existed, was to restrict the flow of air from the PPS in the event of failure of the interlocks that prevent the door from opening until the pressurization line is isolated. The lack of the restricting orifice was determined not to constitute an unreviewed safety question since the PPS performs a leakage monitoring function and not an accident mitigation function. The lack of the orifice, at worst, would result in high PPS flow that would be indicated by alarm in the control room, allowing for operator action to be taken. No new or different accidents are possible since the lack of the orifice would only result in high flow to atmosphere in a leakage monitoring system. The high flow that would result from a failure of the personnel air lock door interlock would not cause failure of the other interlock, or any

other system or equipment since the ability to seal is independent from the existence of the orifice. Since PPS is not credited when determining accident consequences (i.e., dose) the lack of the orifice does not impact the margin of safety.

ESR 94-00321

Description

This activity was performed to abandon-in-place the spent fuel cask decontamination facility. A portable hydrolazer/steam jenny is currently used to facilitate decontamination of the spent fuel shipping cask.

Summary of Safety Evaluation

The cask decontamination facility which uses demineralized water from the Primary and Makeup Water system has been found to be less than optimally effective in decontamination of the spent fuel shipping cask. Abandonment-in-place does not create any changes or situation that would result in an affirmative response to any of the criteria of 10 CFR 50.59 since, effectively, no change is being made. The use of substitute equipment, i.e., the portable hydrolazer/steam jenny, provides an effective functional replacement for the existing facility, but does not result in any changes in operations, equipment, or parameters that could result in an increase in the probability of occurrence or consequences of an accident or malfunction of equipment important to safety previously evaluated, in a possibility of a different type of accident or malfunction of equipment important to safety being created, or in a reduction in the margin of safety.

CR 96-01375, also, Spent Fuel Storage (SFS) Procedure - 001, Revision 12

Description

This activity resulted in a revision to the UFSAR to include a description of the non-redundant yoke used with the spent fuel cask crane for lifting the IF-300 spent fuel shipping cask from the railcar (i.e., empty) to the decontamination facility, and from the decontamination facility after being loaded with spent fuel onto the railcar.

Summary of Safety Evaluation

The spent fuel cask handling crane operations are primarily performed with a redundant yoke, that results in the crane satisfying the criteria for a single failure proof crane. However, two lifting operations are performed with a non-redundant yoke. These lifts are the movement of the empty shipping cask from the railcar to the decontamination facility and the movement of the loaded cask from the decontamination facility to the railcar for shipment. An analysis has been performed for a shipping cask drop accident

that demonstrates that the cask will maintain its structural integrity for a drop of up to 30 feet, which is the maximum lift height for spent fuel cask handling operations at the H. B. Robinson Steam Electric Plant, Unit No. 2. Also, analysis has been performed in this activity to confirm that mixing of unborated water from the spent fuel cask with the borated water in the spent fuel pool will not reduce the boron concentration below required levels. (Note: this activity is currently the subject of a significant condition report in the Corrective Action Program, and an investigation is in progress to determine whether an unreviewed safety question, in fact, exists, due to the assumptions of the drop analysis not accurately reflecting the configuration of the spent fuel shipping cask during the non-redundant lift.)

ESR 95-00893

Description

This ESR removed the capability of injecting dispersant into the Circulating Water system and changed the method of injecting biocide (i.e., sodium hypochlorite) into the Circulating Water system by reducing the number of pumps.

Summary of Safety Evaluation

The Circulating Water Treatment System serves to maintain the reliability of the Circulating Water System and the Service Water System by use of chemical treatment to prevent biofouling of system components. The modification will not affect the ability of the stem to provide normal chlorination as required. The removal of the capability for injection of a dispersant will not impact the function of the system since the dispersant is not needed to maintain system reliability. The circulating Water Treatment System does not perform an accident mitigation function, and failure of the system would not result in biofouling of system components such that compensatory action could not be taken. The only safety related system that interfaces with the Circulating Water Treatment System is the Service Water system, which is built with redundancy such that failure of any system component will not significantly impact operation of the system. These changes are such that accidents or malfunctions of components important to safety different than any previously evaluated could not be created. The change does not result in a reduction in the margin of safety since timely compensatory actions can be taken in the event of system failure.

Corrective Action Program Item 96-01047

Description

This activity revises the UFSAR description of Containment Penetrations 68, 69, and 70, Containment Pressure Sensing Lines, to note that the lines may be opened for post-accident sampling purposes.

Summary of Safety Evaluation

This change provides an alternative means for post-accident sampling of the containment atmosphere. Sampling is normally accomplished by use of Penetrations 35 and 36. The use of the alternative sample source does not have any impact on post-accident dose since the air sample is recirculated to the containment. Use of this alternate source does not result in any changes in operations, equipment, or parameters that could result in an increase in the probability of occurrence or consequences of an accident or malfunction of equipment important to safety previously evaluated, in a possibility of a different type of accident or malfunction of equipment important to safety being created, or in a reduction in the margin of safety.

CR 95-02501

Description

This activity corrects errors and inconsistencies in the UFSAR description of the Spent Fuel Pool Cooling System (SFPCS).

Summary of Safety Evaluation

This activity revises the description contained in the UFSAR, but does not make any equipment changes per se. The changes are necessary to more accurately reflect the system design bases, and to more completely reflect changes that were made during the spent fuel expansion project that was implemented in the 1980's. Certain accident scenarios related to the changes were evaluated in the NRC's Safety Evaluation associated with the project dated June 8, 1982. The changes to the UFSAR do not result in any changes in operations, equipment, or parameters that could result in an increase in the probability of occurrence or consequences of an accident or malfunction of equipment important to safety previously evaluated, in a possibility of a different type of accident or malfunction of equipment important to safety being created, or in a reduction in the margin of safety.

CR 96-01078

Description

This activity increases the administrative limit on the activity of contaminated oil in the contaminated waste oil tank.

Summary of Safety Evaluation

The increase in the administrative limit of activity in the contaminated waste oil tank does not increase the probability of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability of a previously evaluated malfunction of equipment important to safety. If the entire contents of the tank were to become airborne by some mechanism (e.g., fire) analysis shows that the offsite dose to be approximately 0.1% of the permissible limit. This release is within the limits of 10 CFR 20, Appendix B, 10CFR 50, Appendix I, and within the guidelines set forth in IE Circular 80-18, "Safety Evaluations For Changes to Radioactive Waste Treatment Systems."

ESR 96-00552 (Temporary Modification)

Description

This temporary modification involved the installation of a blind flange on the head outlet of Main Steam Safety Valve SV1-4C while the valve was removed for repair during refueling outage 17.

Summary of Safety Evaluation

The blind flange was installed to ensure containment integrity while the valve SV1-4C was removed for repair. The valve was not required to operate since the modification was implemented and removed with the reactor at cold shutdown, therefore, there was no impact on the consequences of an accident. This modification did not impact other systems and there was no credible way that it could contribute to an accident, malfunction of equipment important to safety, or create a new or different type of accident. Since the modification met design requirements for containment closure and refueling integrity, there was no reduction in the margin of safety.

ESR 95-00753

Description

This modification removed the mechanical interlock between the normal and alternate power in the safety-related 120 volt instrument buses. The normal and alternate power supplies are controlled by a break-before-make manual transfer switch.

Summary of Safety Evaluation

The Instrument Buses are provided safety-related regulated and reliable power for safe operation and shutdown of the plant when on the normal power source. The alternate

power source is a non-safety-related, unregulated power supply. Loss of an Instrument Bus is not a precursor to any accident described in the UFSAR, not does the loss impact the mitigation of any analyzed accident. The loss of Instrument Buses is evaluated in the UFSAR and cannot create the possibility of an accident or malfunction of equipment important to safety different than any previously evaluated. Since an alternate power supply is available upon loss of the normal power supply, and there is redundancy and diversity in plant instrumentation the loss of an Instrument Bus will not result in a reduction in the margin of safety.

ESR 95-00686, also Function Restoration Procedure (FRP-H1), "Response to Loss of Secondary Heat Sink," Revision 11

Description

This modification added key switches in the control room to allow the operators to block or override a feedwater isolation signal to the Main Feedwater Bypass Valves and the main Feedwater Pumps. This will allow the use of the Main Feedwater system to feed the Steam Generators in case of a loss of all Auxiliary Feedwater.

Summary of Safety Evaluation

This change will allow the control room operators to respond to a loss of the secondary heat sink in a more simple and direct manner than formerly. This modification deals with accident mitigation and does not involve the possibility of new or different accidents or malfunctions of equipment important to safety, or increase in the probability or consequences of previously evaluated accidents. The margin of safety is not reduced because normal operation will continue in the same mode as previously. In the event of an accident, the change will enable operators to respond in a more simple and direct manner than if using the pre-modification procedure.

Plant Modification 1074

Description

This modification added new electrical cable containment penetrations C3 and D9.

Summary of Safety Evaluation

The addition of the new electrical cable containment penetrations was accomplished in accordance with IEEE Standard 317-1983, "Standard for Electric Penetration Assemblies in Containment Structures for Nuclear Power Generating Stations." The penetrations provide a double pressure barrier and are designed to remain intact during a simultaneous Loss of Coolant Accident and seismic loading conditions. The

penetrations have been analyzed to maintain their integrity during design basis environmental conditions. Leak rate testing will be performed in accordance with 10 CFR 50 Appendix J, type B tests. No changes are made to existing equipment capabilities, operations or operating parameters that impact the probability or consequences of previously analyzed accidents, that create the possibility of a new or different type of accident or malfunction of equipment important to safety, or increases the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this replacement.

CR 96-01602

Description

This activity revises the UFSAR to reflect the correct relieving capacity of the Pressurizer Power Operated Relief Valves (PORVs) from 179,000 lbs./hour to the correct value of 210,000 lbs./hour.

Summary of Safety Evaluation

This is an administrative change to the UFSAR to accurately reflect the relieving capacity of the PORVs. No credit is taken for the PORVs in the mitigation of any analyzed accident. No plant changes are made that could result in the creation of the possibility of a new or different type of accident or malfunction of equipment important to safety, and the probability and consequences of any analyzed accident or malfunction of equipment important to safety is not increased. Since no plant changes are being made, there is no impact on the margin of safety.

ESR 96-00608

Description

This activity provides an alternate drain path from the Pressure Relief Tank (PRT) to the containment sump using the "B" Reactor Coolant Drain Tank Pump and valves, for situations when the PRT temperature exceeds 160 degrees F.

Summary of Safety Evaluation

The PRT, CV sump, and interconnecting valves and piping are not safety-related. Draining and inspecting the PRT does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment

important to safety. There is no reduction of a margin of safety as a result of this replacement.

CR 96-01405

Description

This activity corrects and clarifies portion of the UFSAR description of the Chemical and Volume Control System (CVCS), and identifies the possibility of a boron dilution event by use of the makeup mode switch in the "alternate dilute" position.

Summary of Safety Evaluation

The change identifies that placing the makeup mode switch in the "alternate dilute" position, as well as in the "dilute" position, is an additional means of initiating a boron dilution event. However, like the use of the makeup mode switch in the "dilute" position it also requires two separate operation actions to initiate the event. Therefore the probability of occurrence of a previously analyzed accident is not increased. Consequences of accidents are not impacted since the CVCS is not credited for any accident mitigation. Since the change provides additional information, corrections and clarifications to existing information, no new or different accident or malfunction can occur. The consequences of malfunctions of equipment important to safety are not impacted.

Clarification of Containment Sump Description

Description

As a result of an examination of the containment sump during refueling outage 17, it was determined that clarification of the UFSAR functional description of the sump was needed to reflect current design information. Specifically, the original FSAR assumed that under post-accident conditions, the maximum water level in the sump area, would be below the top of the 4' 6" Emergency Core Cooling System baffle wall. Current calculations indicate that the maximum water level would be above the height of the wall.

Summary of Safety Evaluation

The sump is used for accident mitigation and the changes would not increase the probability of a previously analyzed accident and does not create the possibility of a new type of accident or malfunction of equipment important to safety. The sump continues to be capable of performing its design function and therefore, the consequences of previously analyzed accidents and malfunctions of equipment important to safety are unchanged. There is no impact on the margin of safety.

Modification 1065

Description

This modification changed the Degraded Grid Voltage Relays (DGVR) setpoint. The DGVR will cause the 480 volt emergency buses to separate from the offsite power system if low voltage is experienced, and with the new setpoint, this would occur at a higher voltage for longer than the timer setpoint of 10 +/- 0.5 seconds.

Summary of Safety Evaluation

There are no equipment changes associated with this modification, thus no new or different accidents or malfunctions of equipment important to safety can occur. The DGVR would continue to perform its function of separating the 480 volt buses from the off site power source and the buses would be re-energized by the emergency diesels, and the capability to mitigate the consequences of an accident would remain unchanged. The margin of safety is not impacted since the safety function of the affected system will continue to be performed.

ESR 96-00598

Description

This ESR disconnect a limited number of pressurizer heaters, and the remaining heaters cannot raise the pressurizer temperature at the rate specified in the UFSAR. Technical Specifications requirements regarding the pressurizer heater continue to be met.

Summary of Safety Evaluation

The pressurizer heaters are used to regulate pressure in the reactor coolant system during normal plant operations. The heaters are not involved in accident initiation sequences nor are they involved in accident mitigation, therefore, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this change since the Technical Specifications requirements continue to be met.

Maintenance Refueling Procedure - 003, Revision 2

Description

This change to Maintenance Refueling Procedure (MRP) - 03, "Reactor Vessel Stud Installation and Removal," requires a change to the UFSAR to delete the statement that stud elongation is measured using a micrometer. Alternate means for measuring stud elongation are available.

Summary of Safety Evaluation

This change deletes the reference to measurement of reactor vessel stud elongation after stud tensioning by the use of a micrometer since alternate means, that are at least as accurate as a micrometer, are now available and used. The stud elongation is still determined. Since the function described in the UFSAR is still being performed, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this replacement.

ESR 95-00888

Description

This activity isolated the Penetration Pressurization System (PPS). The PPS is a secondary system which pressurizes certain penetrations between the inner and outer containment boundaries with air at a slightly higher pressure than the peak containment pressure that would result from a design basis accident. No credit is taken for the operation of this system for accident mitigation.

Summary of Safety Evaluation

The PPS performs a leakage monitoring function, and is not involved in any accident initiation sequence. Its operation is not credited in the mitigation of any analyzed accident. The modification will change the operation from continuous to intermittent operation, and substantive equipment modifications have not been performed that alter the fundamental characteristic of the system. Due to the nature of the system and the modification, the change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this replacement.

CR 96-00733

Description

This activity is a corrective action undertaken as a result of an audit by the Nuclear Assessment Section that identified inconsistencies within UFSAR section 9.5.1, 9.5.1A, and 9.5.1B. The change consists of a general revision to remove inconsistencies that have been created due to changes in plant practices and design changes, and to perform editorial changes.

Summary of Safety Evaluation

The changes are primarily editorial in nature, and no new accident scenarios are introduced. Fire Protections systems are not credited in the mitigation of any analyzed accident in the UFSAR.

Certain changes deal with adjustments to the fire severity in certain areas, but in areas where the fire severity is increased, a review of Safety Evaluations and Exemptions shows that no compliance issues are introduced. Further, these changes do not endanger ability of the passive or active fire protection features to perform their design functions. The changes do not change any current plant equipment or configuration or decrease the level of protection to any safety related equipment. For the reasons cited, the change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this revision.

ESR 95-00860

Description

The ESR provides the reload of nuclear fuel for operating cycle 18.

Summary of Safety Evaluation

The new fuel for cycle 18 is identical in design to that used in cycle 17 and similar to that used in previous cycles, no fuel design issues were introduced in this reload. The evolution from a "mixed core" to a core with all High Thermal Performance (HTP) has been evaluated and thermal-hydraulics parameters have been found to be acceptable. The cycle will be longer than the previous cycle, which required increased uranium enrichment, and the increased use of gadolinia rods. The change introduced in cycle 18 are relatively minor and their impact has been evaluated and been demonstrated to be acceptable within the current licensing basis. No Technical Specifications changes

were required to support the reload. The analysis of record for the UFSAR analyzed accidents for cycle 18 confirm compliance with the applicable criteria for each event.

None of the cycle 18 issues impact any equipment of conditions that are initiators for any analyzed accident. No changes to fuel design or reload procedures have been made that would increase the probability of accidents that are initiated during refueling operations i.e., a fuel misloading or mishandling event. Analysis has demonstrated that the consequences of previously analyzed accidents, represented by the assessment of offsite dose, are bounded by the current analysis. The changes associated with the reload are minor and no fundamental changes have been made that could introduce a new or different type of accident or malfunction of equipment important to safety as a result. Since the fuel is nearly identical to that previously used, and no fundamental operational change are being made, no possibility of a malfunction of equipment important to safety is created.

The changes associated with the reload are limited to minor issues. There is no fundamental change to any equipment or operation of the plant that could introduce a new or different type of failure mode or initiator or place the plant under substantially different operating demands. Analysis has been performed that demonstrates continued compliance with acceptance criteria to ensure that radiological barriers are adequately protected during operation and postulated transient and accident conditions. The margin of safety has not been reduced.

ESR 95-00555

Description

This modification enlarged an existing opening in the containment Personnel Airlock shielding wall and added a lifting beam in the access opening.

Summary of Safety Evaluation

The concrete shield wall for the containment Personnel Airlock is a concrete shield and not a structural member. The access opening is closed with solid concrete blocks when not in use. Enlarging the opening does not affect the ability of the wall to perform its shielding function since the enlarged opening will be closed with concrete blocks when not in use. The overhead hoist will handle heavy loads over a safe load path. The modification does not impact safety related equipment or systems. For reasons discussed above, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this change.

ESR 94-00731

Description

This modification added a collar to the end plate of the bellows of a containment penetration. The modification returns the penetration to a leak tight condition.

Summary of Safety Evaluation

This modification is intended to ensure that the containment penetration will perform its design function. The addition of the collar does not have the potential to impact any other components or systems, and the ability of the Service Water system to perform its function through use of the affected penetration is not diminished. Containment integrity will be ensured by the 10 CFR 50, Appendix J leak testing program. Therefore, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this change.

ESR 95-00168

Description

This activity removes the bellows on the Steam Generator Blowdown penetrations, S24, S26, and S30 and isolates Service Water flow to the coolers. The Service Water flow is made unnecessary by the removal of the bellows and addition of insulation.

Summary of Safety Evaluation

The effect of this modification was to remove PPS service to the penetrations. The PPS is not assumed as an accident initiator, not is its operation assumed in the mitigation of any analyzed accident. The modification will assure that the containment structure is not thermally damaged by the addition of insulation in the affected penetrations. Containment integrity will be assured by the 10 CFR 50, Appendix J leak testing program. This change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this change.

ESR 95-00907

Description

This activity adds an alarm circuit to monitor a loss of DC control power to the emergency bus undervoltage relays and adds a second channel undervoltage contact to the existing diesel generator starting circuitry.

Summary of Safety Evaluation

This modification will not increase the probability of consequence of any analyzed accident or malfunction of equipment important to safety since its purpose to provide greater assurance of the capability for accident mitigation. No changes are made that add a new failure mechanism, hence there is no possibility of a new or different type of accident or malfunction of equipment important to safety. The margin of safety is not reduced since the modification will not impact diesel capacity or the capacity of any other safety components.

ESR 96-00284

Description

This activity changes the seat material in the diesel fuel oil day tank solenoid valves

Summary of Safety Evaluation

The modification changed the seat material in the diesel fuel oil day tank solenoid valves to a material that that has been evaluated to have superior characteristics. This change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this replacement.

ESR 96-00366

Description

This activity was performed to provide acceptable levels for the Boric Acid Storage Tanks and the Refueling Water Storage Tank when at cold shutdown to support shutdown risk management requirements.

Summary of Safety Evaluation

This ESR provided information that was used to ensure that the shutdown safety features are available in accordance with regulatory commitments. There were no changes to plant equipment or operation. Therefore, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety.

ESR 96-00375

Description

This activity was performed to provide information to a change to the alarm setpoint of the diesel generator fuel oil storage tank.

Summary of Safety Evaluation

This activity does not alter the required capacity of the diesel generator fuel oil storage tanks provided in the Technical Specifications. The change merely affects alarm setpoint for tank level. There are no changes that impact plant operation or equipment. The ability of the equipment to perform its safety functions are maintained and no new types of accidents or malfunctions of equipment important to safety are introduced. The existing margin of safety is maintained.

ESR 96-00429

Description

This activity provided justification for not providing lubrication for the ropes on the Spent Fuel Cask Crane and the Spent Fuel Bridge Crane.

Summary of Safety Evaluation

The only accident associated with the failure of crane ropes would be damage to plant equipment from a load drop accident, or damage to the load itself. Wire rope lubrication, or its absence, is not a controlling factor in rope failure. The periodic rope inspections that are conducted determine when the rope reaches the end of its life, and rope replacement is a Technical Specifications requirement. Therefore, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences

of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety.

ESR 96-00437

Description

This activity was conducted to resolve conflicting information regarding the design temperature for the Refueling Water Storage Tank (RWST). The scope of the activity was limited to the structural design temperature only.

Summary of Safety Evaluation

The change of the structural design temperature of the RWST to 200 degrees F does not change the operational requirements of the various systems supported by the RWST. This evaluation creates no new adverse interactions with any other systems structures, or components. Therefore, this activity does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety since the operational requirements of the various systems supported by the RWST are not changed.

ESR 96-00538

Description

This activity evaluates repairs to the containment sump screens to ensure that functional and structural requirements are met.

Summary of Safety Evaluation

The repairs to the containment sump screens maintain the existing requirements with the exception of the material corrosion resistance. The corrosion impact has been evaluated and determined that the effect on the structure will not prevent the containment sump screens from performing their design function and will not degrade the ability of any other equipment. Therefore, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this replacement.

ESR 96-00622

Description

This modification was performed to return the Reactor Coolant Pump (RCP) bay screens to an acceptable condition by repairing the screens so that there are no opening in the screens greater than one inch. The repairs were accomplished by sealing openings in the screens with a stainless steel wire mesh and securing them with stainless steel tie wires.

Summary of Safety Evaluation Summary of Safety Evaluation

The repairs to the RCP bay sump screens maintain the existing requirements with the exception of the material corrosion resistance. The corrosion impact has been evaluated and determined that the effect on the structure will not prevent the screens from performing their design function and will not degrade the ability of any other equipment. Therefore, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this replacement.

ESR 96-00329

Description

This activity evaluated the acceptability of using NEMA AB-4 as the acceptance criteria and test methodology for testing breakers associated with the commitments to 10 CFR 50, Appendix R.

Summary of Safety Evaluation

The breakers being tested will be removed from the operating panels, thus the testing will not adversely impact any plant operations. The breaker testing for Appendix R is performed during a refueling outage. If test results are satisfactory, the breakers are returned to normal service, otherwise they are replaced. Therefore, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this activity since there is no design change or physical plant modification

Operations Surveillance Test (OST) - 014, Revision 1

Description

This revision to OST - 014, "LLRT of Personnel Air Lock Door Seals," changes the acceptance criterion for leak due to a change in the test pressure.

Summary of Safety Evaluation

The change in the acceptance criterion from 0.1 scfm to 0.4 scfm is appropriate based on a change in test pressure from 10 psig to 40 psig. The air lock door seal test is intended to demonstrate that no gross seal problems exist and no debris is present in the seal area. The probability and consequences of previously analyzed accidents are unchanged since the door seal integrity is assured. Also, since no physical modifications are being performed, this activity does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this change.

CR 96-01218

Description

This activity changes the reactor trip breaker maintenance and trending program by discontinuing the replacement of the undervoltage trip attachment on the current 5 year interval, discontinuing the measurement of the mechanical trip force of the trip bar and the undervoltage trip attachment, and discontinuing the trending of breaker insulation resistance.

Summary of Safety Evaluation

These changes involve trending information that provides little value. The changes do not affect the operation or function of any equipment evaluated in the Safety Analysis Report, and no changes are being made to the plant. No changes are being made to the operation of function of safety related equipment. Therefore, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this change.

Engineering Surveillance Test (EST) - 137, Revision 2

Description

This activity adds guidance for repairs to be complete after 200 degrees F, to EST - 137, "Local Leak Rate Testing of Mechanical Penetration Sleeves." Specifically, guidance is added that states that if repairs are to be postponed until after startup, then postponement justification is needed and assurance is required that the total LLRT leakage is less than 0.6 La prior to startup.

Summary of Safety Evaluation

This procedure revision maintains the containment leakage acceptance criteria of less than 0.6 La. The individual leak rate acceptance criteria only ensure that that total leakage rate remains acceptable. No accident probability or malfunction of equipment possibility or consequences are affected. Since no physical changes are being made no new accidents or malfunctions can be introduced. The margin of safety is unchanged since the total containment leak rate acceptance criterion is unchanged.

Fuel Management Procedure (FMP) - 002, Revision 5

Description

This revision change the methodology for adjustment of the nuclear instrumentation system from the XTGPWR/INCORE to MICROBURN-P/INPAX.

Summary of Safety Evaluation

The nuclear instrumentation system is not an accident initiating system any analyzed accident, and the capability for accident mitigation is not changed since the basic methodology is not changed and the new methodology has been evaluated and approved previously. No new equipment configurations or operating conditions are created, hence no new or different accident or malfunction of equipment important to safety can occur. The margin of safety is preserved since the MICROBURN-P/INPAX data has been found to be acceptable for core monitoring use.

EST - 028, Revision 1

Description

This activity revises the testing of the Main Steam Safety Valves (MSSVs) to allow the testing to be performed with the reactor is at power.

Summary of Safety Evaluation

This revision does not increase the possibility of the MSSVs lifting 100% open as evaluated in the UFSAR chapter 15.1.4. The test only opens the valve slightly and then immediately removes the opening force, allowing the valve spring to shut the valve. No new equipment configurations introduced by this change. Therefore, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this change.

Operations Surveillance Test (OST) - 922, "Dedicated Shutdown Equipment Identification Audit (Semi Annual), " Revision 7

Description

This activity deletes the use of green paint as an identifier for dedicated shutdown equipment as well as provides for a general upgrade to the procedure.

Summary of Safety Evaluation

OST - 922 only audits the presence of equipment. It does not change any plant parameters or components. This test has no effect on the physical nature of the plant or systems. The regulatory commitment provides that dedicated shutdown equipment will be distinctively identified. This had been accomplished by painting of handwheels and surfaces with green paint. A Condition Report identified problems with the use of the green paint and it became necessary to discontinue the practice. This change will allow the use of distinctive labels to identify the equipment and the commitment is met. Due to the nature of this change, this does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety.

Maintenance Instruction Procedure (MIP) - 307, Revision 3

Description

This activity allows use of a temporary power feed to containment coolers HVH - 1, 2, 3 and/or 4 during refueling outage 17 using HVH 5A and 5B as a power source.

Summary of Safety Evaluation

The temporary use of the HVH 5A and 5B feeder cable is only allowed during a refueling outage when the reactor is shut down. No changes are made to the design of the equipment and HVH 5A and 5B are not required during the outage. The equipment will be restored to its original configuration prior to restart. Therefore, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this activity.

PPP 106, "Alternate Cooling Of WCCU's," Revision 0

Description

This activity creates a new plant procedure that is needed when normal cooling water supply (i.e., Service Water) is unavailable and Fire Water is used to provide cooling water to the Control Room Water Cooled Condensing Units (WCCUs).

Summary of Safety Evaluation

A change in the source of cooling water to the Control Room WCCUs does not credibly initiate an accident analyzed in the UFSAR. Performance of this procedure will isolate Service Water from the WCCUs, but will not prevent the Service Water system from performing its design accident mitigation functions. Malfunction of the Service Water system, Fire Protection system, and the WCCUs were considered and it was concluded that there was no possibility of a new or different type of accident or malfunction of equipment important to safety, nor was there an increase in consequences of any equipment malfunction as a result of this procedure. The margin of safety is not reduced since the Control Room will remain habitable during a release of radioactivity to the atmosphere.

Operations Management Manual (OMM) Procedure - 005, "Clearance and Test Request," Revision 30

Description

This activity revises OMM - 005 to allow a limited additional duty scope for maintenance personnel in the local manipulation of operational controls. Other changes to the procedure deal with administration of the program and do not affect licensed basis work.

Summary of Safety Evaluation

This revision will allow non-operational personnel to perform limited scope activities involved with the manipulation of components. These personnel will be trained for their job functions in accordance with the Systematic Approach to Training concept. The training will be based on an appropriate need analysis and, therefore, will meet the intent of ANSI N-18.1 and ANSI N-3.1 for training of personnel. Therefore, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this revision since the personnel performing manipulation of equipment will be adequately trained.

Special Procedure (SP) - 1374

Description

The activity was the generation of a special procedure to allow the use of temporary for the Reactor Vessel Level Indication System (RVLIS), the Post Accident Monitoring (PAM) panel, Radiation Monitoring circuits and Chemical and Volume Control (CVCS) valve LCV-115B during refueling outage 17 and only when the reactor core was offloaded.

Summary of Safety Evaluation

The equipment involved is not involved in any accident mitigation sequences. Required functions are maintained by use of temporary power. The modification was evaluated for common mode failure vulnerabilities and where found these vulnerabilities were eliminated by disconnecting normal power cables and using spare circuit breakers or fuses, except in the PAM and the Radiation Monitoring console. This is acceptable for the PAM since it is not credited for accident mitigation. The Radiation Monitoring console could be affected by a common mode failure in the power supply; however, it would be mitigated by DC power until the temporary circuit could be restored. Adequate compensatory measures are available, or work is limited to the period when the core is offloaded, to ensure that the margin of safety is not reduced.

SP - 1386

Description

This activity provided a special procedure to allow for control rod drop testing during refueling outage 17.

Summary of Safety Evaluation

This activity does not change the design or operation of the components of the control rod drive system. Although the turbine runback function is disconnected for this test, the circuit is not operable since the test is performed offline. The data acquisition equipment does not connect to any active plant signals and therefore cannot damage any electronic circuits. During the test, the required shutdown margin is maintained, and the margin of safety is not reduced. Therefore, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety.

SP - 1385

Description

This activity provides a special procedure to allow for the use of the portable Rod Control Cluster Assembly (RCCA) change tool for use of control rod drag testing during refueling outage 17.

Summary of Safety Evaluation

The portable RCCA change tool is not used at the same time as the fuel handling tool and therefore will not increase the likelihood of a fuel handling accident. The weight of the tool and the method of attaching the tool to the spent fuel bridge crane are not altered and the likelihood of dropping the tool and damaging an assembly is not increased. The use of the tool does not alter any system or structure credited for accident mitigation. Therefore, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result since the use of the RCCA change tool to perform drag testing will not result in stresses to any RCCA, fuel assembly, or spent fuel pool system or structure that are beyond those normally allowed.

Abnormal Operating Procedure (AOP) - 015, "Secondary Load Rejection or Turbine Runback," Revision 5

Description

This activity revises AOP - 015 to add steps from the approved AOP - 022 regarding emergency boration to prevent the requirement for operators to implement two procedures simultaneously, as well as make miscellaneous changes.

Summary of Safety Evaluation

This revision add steps from an approved plant procedure to prevent the need to implement two procedures simultaneously. No changes in plant equipment or operation are introduced. Therefore, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety.

AOP - 014, "CCW System Malfunction," Revision 11

Description

AOP - 014 was revised to enhance the ability to prevent lifting of the charging pump safety valves from pump and valve operation.

Summary of Safety Evaluation

This revision results in supplying emergency cooling to the charging pump at a time earlier than previously performed. Changes to the procedure that trip a Reactor Coolant Pump will assure that a faulted RCP will be removed from service sooner and reduce the probability of a RCP seal failure. Therefore, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety since the actions taken to mitigate a loss of all Component Cooling Water are now taken sooner after the initiation of the event.

Maintenance Management Manual (MMM) Procedure - 009, "Operating, Testing and Inspection of Cranes and Material Handling Equipment," Revision 22

Description

This activity involved a revision to MMM - 009 as a result of a pre-spent fuel shipping campaign review of heavy loads procedures versus regulatory requirements and commitments. Specific changes include the definition of unloaded hooks and load blocks as heavy loads, evaluation of the turbine-generator crane and the turbine lifting beam as heavy loads, and increasing the level of control for portable and mobile cranes and hoists.

Summary of Safety Evaluation

The changes made to OMM - 009 clarify and enhance the ability to protect safe shutdown equipment and irradiated fuel. The changes doe not increase the probability of occurrence of an accident or malfunction of equipment important to safety, and eliminate the possibility of any different type of accident. There were no previously analyzed accidents or malfunctions of equipment important to safety in the SAR, therefore the consequences of previously analyzed accidents or malfunctions of equipment important to safety are not increased. No changes in equipment operation or configuration, except for additional restrictions or controls are implemented, therefore no new or different type of accident or malfunction of equipment important to safety can be created. No changes have been made that would decrease the margin of safety.

Withdrawal of Relief Request 13 From the Third Ten-Year Inservice Inspection Program

Description

This activity evaluated the withdrawal of relief request 13, concerning the inspection of RCP visual and volumetric inspections, from the third ten-year Inservice Inspection (ISI) program.

Summary of Safety Evaluation

The withdrawal of relief request 13 is an administrative change that does not involve any accidents or transients. The withdrawal reinstates the original commitment to perform internal visual and volumetric inspections by the end of the third ten-year interval. This action will not degrade the ability of the RCPs to perform their intended function. This action is a conservative change in commitment back to the original code requirements. Therefore, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase

the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this change.

Spent Fuel Pool Temperature Monitoring During Full Core Offload

Description

This activity was performed to evaluate a change to the commitment for spent fuel pool temperature monitoring documented in the June 8, 1982, safety evaluation for spent fuel pool expansion.

Summary of Safety Evaluation

The UFSAR discusses the need to maintain the Spent Fuel Pool temperature below 150 degrees F. However, the June 8, 1982, safety evaluation discusses the control of the temperature by prolonging the time to offload fuel, by monitoring the temperature after the first 52 assemblies are offloaded, etc. The change being evaluated relies on the continuous monitoring of the spent fuel pool temperature with equipment which provides an alarm when the temperature exceeds 140 degrees F. The method of monitoring temperature is the only change being made; sufficient time for compensatory actions remains. Therefore, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this change.

Industrial Security Plan, Revision 33

Description

The changes to the Industrial Security Plan are editorial, have been evaluated to not decrease the effectiveness of the Plan, and have no impact on operator accessibility to safety related equipment. The changes are made as a result of Carolina Power & Light Company's response to NRC Inspection Report 50-261/96-13.

Summary of Safety Evaluation

The changes to the Plan are editorial in nature and there is no effect on the accessibility of operations personnel to safety related equipment. The changes only affect the Security organization, and no changes are made to the plant equipment configuration or operation. Therefore, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type

of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this revision.

Plant Program Procedure (PLP) - 055, "Outage Risk Management," Revision 7

Description

This activity is a general revision to PLP -055 as a result of lessons learned from refueling outage 16, and as a result of the biennial review of this procedure.

Summary of Safety Evaluation

The changes ensure that shutdown safety features are maintained per regulatory commitments to reduce the likelihood of an accident during cold shutdown. The procedure ensures that Technical Specifications requirements associated with outage - significant systems are met and factored into outage planning and scheduling. No changes to the plant or equipment are made by this change. The changes ensure that the margin of safety is not reduced by lowering risk by equipment redundancy, administrative controls, and contingency planning. Therefore, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this revision.

PLP - 055, "Outage Risk Management," Revision 11

Description

This activity adds a caution concerning the risk review of work requests, and corrects information in Attachment 10.3 concerning nuclear instrumentation requirements.

Summary of Safety Evaluation

The changes ensure that shutdown safety features are maintained per regulatory commitments to reduce the likelihood of an accident during cold shutdown. The procedure ensures that Technical Specifications requirements associated with outage - significant systems are met and factored into outage planning and scheduling. No changes to the plant or equipment are made by this change. Therefore, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of

a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this revision.

PLP - 055, "Outage Risk Management," Revision 12

Description

This activity revises PLP - 055 to better explain the protected train approach utilized in the outrage schedule, allows an emergency diesel generator to be the backup power source for the spent fuel pool cooling pumps, clarifies limitations on backfeeding, and clarifies the definition of "Functional."

Summary of Safety Evaluation

The changes ensure that shutdown safety features are maintained per regulatory commitments to reduce the likelihood of an accident during cold shutdown. The procedure ensures that Technical Specifications requirements associated with outage - significant systems are met and factored into outage planning and scheduling. No changes to the plant or equipment are made by this change. Therefore, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this revision.

PLP - 055, "Outage Risk Management," Revision 13

Description

This activity revises PLP - 055 to allow the containment sump to Recirculation Heat Removal (RHR) system flowpath to be unavailable when at normal cold shutdown with the reactor coolant system depressurized.

Summary of Safety Evaluation

UFSAR section 6.3 states that no accident initiating event will occur during cold shutdown that requires operation of the Emergency Core Cooling System; however, this change ensures provides assurance that in the event that the refueling cavity integrity is lost, sufficient cooling of the core remains without the use of the containment sump to preclude off-site consequences in excess of limits. Failure of the pneuma-seal has been evaluated to not be credible; however, if this were to occur inventory recovery from such a failure is not necessary since reactor coolant system level would not drop below the vessel flange. The changes ensure that shutdown safety features are maintained per regulatory commitments to reduce the likelihood of an

accident during cold shutdown. The procedure ensures that Technical Specifications requirements associated with outage - significant systems are met and factored into outage planning and scheduling. No changes to the plant or equipment are made by this change. Therefore, this change does not impact the probability or consequences of previously analyzed accidents, does not create the possibility of a new or different type of accident or malfunction of equipment important to safety, and does not increase the probability or consequences of a previously evaluated malfunction of equipment important to safety. There is no reduction of a margin of safety as a result of this revision.

ESR 96-00023

Description

This activity was performed to justify the substitution of equivalent material for stainless steel in the RHR room coolers.

Summary of Safety Evaluation

The RHR room coolers are not involved in any accident initiation sequences, therefore there is no increase in the probability of a previously analyzed accident and no possibility of a new or different type of accident or malfunction of equipment important to safety. The material substitution does not affect the operational performance of the coolers, therefore consequences of any accident or malfunction of equipment important to safety are not increased and the margin of safety is not reduced.