ATTACHMENT 2 to AEP:NRC:1169

PROPOSED REVISED TECHNICAL SPECIFICATIONS PAGES

Lastly, we note that the Commission has provided guidance concerning determination of significant hazards by providing certain examples (48 FR 14780) of amendments considered not likely to involve significant hazards considerations. The sixth of these examples refers to changes that either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within the limits established as acceptable.

The analyses that are referenced in this submittal have been demonstrated to comply with the licensing basis of the plant. Thus, we believe that the example cited is applicable and that the changes should not involve significant hazards consideration.

3/4.7 PLANT SYSTEMS

BASES

3/4.7.1 TURBINE CYCLE

3/4.7.1.1 SAFETY VALVES

The OPERABILITY of the main steam line code safety valves ensures that the secondary system pressure will be limited to within 110% of its design pressure of 1085 psig during the most severe anticipated system operational transient. The maximum relieving capacity is associated with a turbine trip from 100% RATED THERMAL POWER coincident with an assumed loss of condenser heat sink (i.e., no steam bypass to the condenser).

The specified valve lift settings and relieving capacities are in accordance with the requirements of Section III of the ASME Boiler and Pressure Code, 1971 Edition. The safety valve is OPERABLE with a lift setting of ±3% about the nominal value. However, the safety valve shall be reset to the nominal value ±1% whenever found outside the ±1% tolerance. The total relieving capacity for all valves on all of the steam lines is 17,153,800 lbs/hr which is approximately 121 percent of the total secondary steam flow of 14,120,000 lbs/hr at 100% RATED THERMAL POWER. A minimum of 2 OPERABLE safety valves per operable steam generator ensures that sufficient relieving capacity is available for the allowable THERMAL POWER restriction in Table 3.7-1.

STARTUP and/or POWER OPERATION is allowable with safety valves inoperable within the limitations of the ACTION requirements on the basis of the reduction in secondary system steam flow and THERMAL POWER required by the reduced reactor trip settings of the Power Range Neutron Flux channels. The reactor trip setpoint reductions are derived on the following bases:

For 4 loop operation

$$SP = \frac{(X) - (Y)(V)}{X} \times (109)$$

Where:

SP = reduced reactor trip setpoint in percent of RATED THERMAL POWER

V = maximum number of inoperable safety valves per steam line = 1, 2 or 3.

X = Total relieving capacity of all safety valves per steam line = 4,288,450 lbs/hour.

Y = Maximum relieving capacity of any one safety valve = 857,690 lbs/hour

(109) = Power Range Neutron Flux-High Trip Setpoint for 4 loop operation.

EMERGENCY CORE COOLING SYSTEMS

ECCS SUBSYSTEMS - $T_{avg} \geq 350°F$

LIMITING CONDITION FOR OPERATION

3.5.2 Two independent ECCS subsystems shall be OPERABLE with each subsystem comprised of:

a. One OPERABLE centrifugal charging pump,

b. One OPERABLE safety injection pump

c. One OPERABLE residual heat removal heat exchanger,

d. One OPERABLE residual heat removal pump,

e. An OPERABLE flow path capable of taking suction from the refueling water storage tank on a safety injection signal and transferring suction to the containment sump during the recirculation phase of operation, and

f. All safety injection cross-tie valves open.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

a. With one ECCS subsystem inoperable, restore the inoperable subsystem to OPERABLE status within 72 hours or be in HOT SHUTDOWN within the next 12 hours.

b. With a safety injection cross-tie valve closed, restore the cross-tie valve to the open position or reduce the core power level to less than or equal to 3250 MW within one hour. Specification 3.0.4 does not apply.

c. In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date.

TABLE 3.7-4

STEAM LINE SAFETY VALVES PER LOOP

VALVE NUMBER	LIFT SETTING (± 3%)*	ORIFICE SIZE
a. SV-1	1065 psig	16 $in.^2$
b. SV-1	1065 psig	16 $in.^2$
c. SV-2	1075 psig	16 $in.^2$
d. SV-2	1075 psig	16 $in.^2$
e. SV-3	1085 psig	16 $in.^2$

*The lift setting pressure shall correspond to ambient conditions of the valve at nominal operating temperature and pressure.

3/4.5 EMERGENCY CORE COOLING SYSTEMS

BASES

3/4.5.1 ACCUMULATORS

The OPERABILITY of each RCS accumulator ensures that a sufficient volume of borated water will be immediately forced into the reactor core through each of the cold legs in the event the RCS pressure falls below the pressure of the accumulators. This initial surge of water into the core provides the initial cooling mechanism during large RCS pipe ruptures.

The limits on accumulator volume, boron concentration and pressure ensure that the assumptions used for accumulator injection in the safety analysis are met.

The accumulator power operated isolation valves are considered to be "operating bypasses" in the context of IEEE Std. 279-1971, which requires that bypasses of a protective function be removed automatically whenever permissive conditions are not met. In addition, as these accumulator isolation valves fail to meet single failure criteria, removal of power to the valves is required.

The limits for operation with an accumulator inoperable for any reason except an isolation valve closed minimizes the time exposure of the plant to a LOCA event occurring concurrent with failure of an additional accumulator which may result in unacceptable peak cladding temperatures. If a closed isolation valve cannot be immediately opened, the full capability of one accumulator is not available and prompt action is required to place the reactor in a mode where this capability is not required.

3/4.5.2 and 3/4.5.3 ECCS SUBSYSTEMS

The OPERABILITY of two independent ECCS subsystems ensures that sufficient emergency core cooling capability will be available in the event of a LOCA assuming the loss of one subsystem through any single failure consideration. Either subsystem operating in conjunction with the accumulators is capable of supplying sufficient core cooling to limit the peak cladding temperatures within acceptable limits for all postulated break sizes ranging from the double ended break of the largest RCS cold leg pipe downward. In addition, each ECCS subsystem provides long term core cooling capability in the recirculation mode during the accident recovery period.

If a safety injection cross-tie valve is closed, safety injection would be limited to two lines assuming the loss of one safety injection subsystem through a single failure consideration. The resulting lowered flow requires a decrease in THERMAL POWER to limit the peak clad temperature within acceptable limits in the event of a postulated small break LOCA.

3/4.7 PLANT SYSTEMS

BASES

3/4.7.1 TURBINE CYCLE

3/4.7.1.1 SAFETY VALVES

The OPERABILITY of the main steam line code safety valves ensures that the secondary system pressure will be limited to within 110% of its design pressure of 1085 psig during the most severe anticipated system operational transient. The maximum relieving capacity is associated with a turbine trip from 100% RATED THERMAL POWER coincident with an assumed loss of condenser heat sink (i.e., no steam bypass to the condenser).

The specified valve lift settings and relieving capacities are in accordance with the requirements of Section III of the ASME Boiler and Pressure Code, 1971 Edition. The safety valve is OPERABLE with a lift setting of $\pm$3% about the nominal value. However, the safety valve shall be reset to the nominal value $\pm$1% whenever found outside the $\pm$1% tolerance. The total relieving capacity of all safety valves on all of the steam lines is 17,153,800 lbs/hr which is at least 105 percent of the maximum secondary steam flow rate at 100% RATED THERMAL POWER. A minimum of 2 OPERABLE safety valves per steam generator ensures that sufficient relieving capacity is available for the allowable THERMAL POWER restriction in Table 3.7-1.

STARTUP and/or POWER OPERATION is allowable with safety valves inoperable within the limitations of the ACTION requirements on the basis of the reduction in secondary system steam flow and THERMAL POWER required by the reduced reactor trip settings of the Power Range Neutron Flux channels. The reactor trip setpoint reductions are derived on the following bases:

For 4 loop operation

$$SP = \frac{(X) - (Y)(V)}{X} \times (109)$$

Where:

SP = reduced reactor trip setpoint in percent of RATED THERMAL POWER

V = maximum number of inoperable safety valves per steam line

X = total relieving capacity of all safety valves per steam line in lbs./hours = 4,288,450

Y = maximum relieving capacity of any one safety valve in lbs./hour = 857,690

109 = Power Range Neutron Flux-High Trip Setpoint for 4 loop operation

ATTACHMENT 3 to AEP:NRC:1169

CURRENT PAGES MARKED-UP TO REFLECT PROPOSED CHANGES

TABLE 4.7-1

STEAM LINE SAFETY VALVES PER LOOP

VALVE NUMBER	LIFT SETTING (±3%)*	ORIFICE SIZE
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d. SV-2	1075 psig	16 in.^{2}
e. SV-3	1085 psig	16 in.^{2}

*The lift setting pressure shall correspond to ambient conditions of the valve at nominal operating temperature and pressure.

3/4.7.1 TURBINE CYCLE

3/4.7.1.1 SAFETY VALVES

The OPERABILITY of the main steam line code safety valves ensures that the secondary system pressure will be limited to within 110% of its design pressure of 1085 psig during the most severe anticipated system operational transient. The maximum relieving capacity is associated with a turbine trip from 100% RATED THERMAL POWER coincident with an assumed loss of condenser heat sink (i.e., no steam bypass to the condenser).

INSERT A

The specified valve lift settings and relieving capacities are in accordance with the requirements of Section III of the ASME Boiler and Pressure Code, 1971 Edition. The total relieving capacity for all valves on all of the steam lines is 17,153,800 lbs/hr which is approximately 121 percent of the total secondary steam flow of 14,120,000 lbs/hr at 100% RATED THERMAL POWER. A minimum of 2 OPERABLE safety valves per operable steam generator ensures that sufficient relieving capacity is available for the allowable THERMAL POWER restriction in Table 3.7-1.

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INSERT A

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EMERGENCY CORE COOLING SYSTEMS

ECCS SUBSYSTEMS - $T_{avg} \geq 350°F$

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3.5.2 Two independent ECCS subsystems shall be OPERABLE with each subsystem comprised of:

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f. All safety injection cross-ties ~~are~~ valves open.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

a. With one ECCS subsystem inoperable, restore the inoperable subsystem to OPERABLE status within 72 hours or be in HOT SHUTDOWN within the next 12 hours.

~~b.~~ c. In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date.

b. With ~~the~~ a safety injection cross tie valve closed, restore the cross tie valve to the open position or reduce core power level to less than or equal to 3250 MW within one hour. Specification 3.0.4 does not apply.

TABLE 3.7-4

STEAM LINE SAFETY VALVES PER LOOP

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3/4.5 EMERGENCY CORE COOLING SYSTEMS

BASES

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3/4.7 PLANT SYSTEMS

BASES

3/4.7.1 TURBINE CYCLE

3/4.7.1.1 SAFETY VALVES

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INSERT A

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