

PROPOSED CHANGE  
TECHNICAL SPECIFICATIONS  
SALEM NO. 1

DESCRIPTION OF CHANGE

Modify Salem No. 1 Technical Specifications, Table 3.3-1 (Action 1) and Table 3.3-3 (Action 13) to read the same as Salem No. 2 Technical Specifications, Table 3.3-1 (Action 1) and Table 3.3-3 (Action 13) respectively.

REASON FOR CHANGE

Due to recently added requirements to perform periodic preventive maintenance on the reactor trip breakers, the one (1) hour time frame presently allowed for surveillance testing on Unit No. 1 does not provide a reasonable amount of time to enable the performance of necessary breaker alignment and post maintenance operability testing.

The one (1) hour presently allowed for surveillance testing of the Solid State Protection System (SSPS) and Engineered Safety Features (ESF) automatic actuation logic has been, historically, a difficult requirement to meet. There have been occasions where the ACTION statement requirement to shut down the plant has been commenced and a Licensee Event Report submitted due to Salem technical staff's having to exceed the 1 hour provision to complete the testing.

The need to rush in the performance of these important and comprehensive test procedures increases the potential for mistakes and, thereby, diminishes the level of safe operation that the testing is designed to enhance.

NO SIGNIFICANT HAZARDS EVALUATION

Allowing 2 hours, rather than the presently allowed 1 hour, for performance of surveillance testing on Unit No. 1 will not result in any significant increase in the probability or consequences of an accident, nor significantly reduce the margin of safety as defined in the Technical Specification Bases. The results of the change have been found by the NRC on Salem Unit No. 2 and in the Standard Tech Specs for Westinghouse PWR's, NUREG 0452, Rev. 3, to be clearly within all acceptable criteria with respect to the reactor trip system in the Standard Review Plan.

LCR 83-17 (continued)

Since there are no modifications to the plant or the plant procedures, the possibility of a new or different accident from any accident previously evaluated is not created.

The Commission has provided guidance concerning the application of the standards for a No Significant Hazards determination by providing examples of actions not likely to involve a Significant Hazards Consideration in the Federal Register (48FR14870). One of the examples (vi) relates to changes that may result in some increase to the probability or consequences of a previously-analyzed accident or that may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan. These changes will also establish consistency in the Technical Specifications for identical equipment on Salem Units 1 and 2. This action also conforms, therefore, to example (i) which is provided in 48FR14870.

Since the proposed changes involve actions that conform to two referenced examples in 48FR14870, we have determined that this application for amendment involves No Significant Hazards Consideration.

TABLE 3.3-1 (Continued)

TABLE NOTATION

- \* With the reactor trip system breakers in the closed position and the control rod drive system capable of rod withdrawal.
- \*\* The channel(s) associated with the protective functions derived from the out of service Reactor Coolant Loop shall be placed in the tripped condition.
- # The provisions of Specification 3.0.4 are not applicable.
- ## High voltage to detector may be de-energized above P-6.

ACTION STATEMENTS

- ACTION 1 - With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement, be in HOT STANDBY within 6 hours; however, one channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.1.1 provided the other channel is OPERABLE.
- ACTION 2 - With the number of OPERABLE channels one less than the Total Number of Channels, STARTUP and/or POWER OPERATION may proceed provided the following conditions are satisfied:
  - a. The inoperable channel is placed in the tripped condition within 1 hour.
  - b. The Minimum Channels OPERABLE requirement is met; however, one additional channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.1.1.
  - c. Either, THERMAL POWER is restricted to  $\leq 75\%$  of RATED THERMAL and the Power Range, Neutron Flux trip setpoint is reduced to  $\leq 85\%$  of RATED THERMAL POWER within 4 hours; or, the QUADRANT POWER TILT RATIO is monitored at least once per 12 hours.
- ACTION 3 - With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement and with the THERMAL POWER level:

TABLE 3.3-3 (Continued)

TABLE NOTATION

- # Trip function may be bypassed in this MODE below P-11.
- ## Trip function may be bypassed in this MODE below P-12.
- ### The channel(s) associated with the protective functions derived from the out of service Reactor Coolant Loop shall be placed in the tripped mode.
- \* The provisions of Specification 3.0.4 are not applicable.

ACTION STATEMENTS

- ACTION 13 - With the number of OPERABLE Channels one less than the Total Number of Channels, be in HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours; however, one channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1.
- ACTION 14 - With the number of OPERABLE Channels one less than the Total Number of Channels, operation may proceed until performance of the next required CHANNEL FUNCTIONAL TEST, provided the inoperable channel is placed in the tripped condition within 1 hour.
- ACTION 15 - With a channel associated with an operating loop inoperable, restore the inoperable channel to OPERABLE status within 2 hours or be in HOT SHUTDOWN within the following 12 hours; however, one channel associated with an operating loop may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1.
- ACTION 16 - With the number of OPERABLE Channels one less than the Total Number of Channels, operation may proceed provided the inoperable channel is placed in the bypassed condition and the Minimum Channels OPERABLE requirement is demonstrated within 1 hour; one additional channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.1.

PROPOSED CHANGE  
TECHNICAL SPECIFICATIONS  
SALEM NO. 2

DESCRIPTION OF CHANGE

Correct the apparent typographical error in the third sentence of Section 4.8.1.1.2.c.7 of the Salem Unit 2 Technical Specifications to read, "...after completion of this 24 hour test, perform Specification 4.8.1.1.2.c.4."

REASON FOR CHANGE

The final draft Technical Specifications issued for comment in September 1980 were worded, in Section 4.8.1.1.2.c.7, the same as described above in the Description of Change. But, when Revision 0 of the Unit No. 2 Tech. Specs. was issued with the Full Power Operating License in May 1981, the subject sentence read, "...after completion of this 24 hour test, perform Specification 4.8.1.1.2.c.7b."

There is no Specification 4.8.1.1.2.c.7a or 7b.

The test procedures which accomplish the surveillance requirements of Section 4.8.1.1.2.c.7 were written prior to receipt of the Full Power Operating License Tech. Specs. and were based on the surveillance requirements that were incorporated in the previous issuances of the Tech. Specs. which called for performing Specification 4.8.1.1.2.c.4 after completion of the 24 hour test of Specification 4.8.1.1.2.c.7.

SIGNIFICANT HAZARDS EVALUATION

The proposed correction will restore the subject specification to its intended wording and meaning. The correction will require, and be in agreement with, the testing that has been periodically conducted as originally worded.

Because this proposed amendment involves only an administrative (typographical) change, it will not involve any significant increase in the probability of an accident previously evaluated or a significant reduction in a margin of safety. Because no change in operating conditions will result, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. Because no changes in any accident analysis will result, the proposed amendment does not involve any increase in the consequences of an accident previously evaluated.

This proposed change conforms to example (i) in 48 FR 14870 which was provided as guidance by the Commission for no significant hazards determinations and therefore is deemed to not involve a significant hazards consideration.

PROPOSED CHANGE  
TECHNICAL SPECIFICATION  
SALEM NO. 1 AND 2

DESCRIPTION OF CHANGE

Change the response time for the Unit 2 Overtemperature  $\Delta T$  trip on Table 3.2-2, "Reactor Trip System Instrumentation Response Time" from  $\leq 2.0$  seconds to  $\leq 5.0$  seconds and change the corresponding response time on Unit 1 from  $\leq 6.0$  seconds to  $\leq 5.0$  seconds.

REASON FOR CHANGE

This change is necessary on Unit 2 to allow the use of resistance temperature detectors (RTD's) in the reactor coolant system that meet the environmental qualification criteria of Regulatory Guide 1.97. The RTDs that meet the requirements of Regulatory Guide 1.97 have longer response times than the previously installed (unqualified) detectors. This causes the overall response of the Overtemperature  $\Delta T$  to exceed the Unit 2 technical specification response time requirements of  $\leq 2.0$  seconds.

This requirement on Unit No. 1 is presently  $\leq 6.0$  seconds for the same (identical) equipment and is proposed to be changed on that Unit in the interest of conservatism and continuity in the technical specification.

SIGNIFICANT HAZARDS EVALUATION

The time delay to trip assumed in the accident analyses for Salem Units 1 and 2 Overtemperature  $\Delta T$  is shown in Table 15.1-3 of the Salem UFSAR as 6.0 seconds total time delay. To raise the allowed response time for Unit 2 from  $\leq 2.0$  seconds to the proposed  $\leq 5.0$  seconds will not result in any increase in the probability of an accident. The consequences of an accident could be increased by the change on Unit 2 due to lengthening the Overtemperature  $\Delta T$  trip response time; but, since the response time would remain less than that time response assumed in the accident analyses, the increase in consequences would not be of significant magnitude.

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The margin of safety as defined in the Technical Specification Bases is not reduced since the applicable Bases state, "The measurement of response time at the specified frequencies provides assurance that the protective and ESF action function associated with each channel is completed within the time limit assumed in the accident analyses."

This change for Unit 1 is conservative (ie-shortening the response time requirement). The operation of both Salem Units, as a result of this change, will remain within previously analyzed bounds and clearly within all acceptable criteria with respect to the reactor trip system in the Standard Review Plan and existing requirements of Unit No. 1 Technical Specifications.

The proposed 5.0 seconds response time will provide a conservative limit relative to the accident analysis of the UFSAR and will, at the same time, provide sufficient latitude to allow the use of presently available, environmentally qualified, RTD's.

Since there are no modifications to the plant or the plant procedures, the possibility of a new or different accident from any accident previously evaluated is not created.

The Commission has provided guidance concerning the application of the standards for a No Significant Hazards determination by providing examples of actions not likely to involve a Significant Hazards Consideration in the Federal Register (48FRI4870). One of the examples (vi) relates to changes that may result in some increase to the probability or consequences of a previously-analyzed accident or that may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan. These changes will also establish consistency in the Technical Specifications for identical equipment on Salem Units 1 and 2. This action also conforms, therefore, to example (i) which is provided in 48FRI4870.

Since the proposed changes involve actions that conform to two reference examples in 48FRI4870, we have determined that this application for amendment involves No Significant Hazards Consideration.