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U. S. Nuclear Regulatory Commission
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Subject: Arkansas Nuclear One - Unit 1
Docket No. 50-313
License No. DPR-51
Proposed Technical Specification Change Request Concerning
the Arkansas Nuclear One - Unit 1 Instrumentation Systems

Gentlemen:

Attached for your review and approval is a proposed Technical Specification (TS) change revising the specifications governing the reactor protection system (RPS). This change modifies the use of the RPS channel bypass as specified by TS 3.5.1.3 and the associated Bases for TS 3.5.1.3 and TS 3.5.1.11 and revises a note associated with TS Table 3.5.1-1 to refer to a more appropriate action. The change will allow Entergy Operations flexibility in the control of inoperable functions in the individual RPS channels while requiring that appropriate evaluations are conducted to ensure that the RPS and other inter-connected systems are placed in the safest configurations during operation with inoperable components and clarifies the requirements of TS Table 3.5.1-1.

The proposed change has been evaluated in accordance with 10CFR50.91(a)(1) using criteria in 10CFR50.92(c) and it has been determined that this change involves no significant hazards considerations. The bases for these determinations are included in the attached submittal.

Entergy Operations requests that the effective date for this change be immediately upon NRC issuance of the amendment. Although this request is neither exigent nor emergency, your prompt review is requested.

A001

Very truly yours,

Jerry W Yelverton

JWY/cws
Attachments

To the best of my knowledge and belief, the statements contained in this submittal are true.

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for Logan **County and the State of Arkansas, this** 13th **day of** January **, 1994.**

Sandy Silvermorgen
Notary P blic
My Commission Expires May 11, 2000

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ATTACHMENT

TO

1CAN019401

PROPOSED TECHNICAL SPECIFICATION

AND

RESPECTIVE SAFETY ANALYSES

IN THE MATTER OF AMENDING

LICENSE NO. DPR-51

ENTERGY OPERATIONS, INC.

ARKANSAS NUCLEAR ONE, UNIT ONE

DOCKET NO. 50-313

DESCRIPTION OF PROPOSED CHANGES

The Arkansas Nuclear One - Unit 1 (ANO-1) Technical Specification (TS) Section 3.5 "Instrumentation Systems" has been revised as follows:

- TS 3.5.1.3 has been reworded to allow optional use of the channel bypass switch for on-line testing and in the event of a protection instrument or channel failure. Additional requirements have been added to ensure that only one reactor protection system (RPS) channel may be placed in channel bypass or contain inoperable functions or components unbypassed in the untripped state at any one time. Included in the additional requirements is an action to tag the remaining RPS key operated channel bypass switches when operating with inoperable functions unbypassed in the untripped state. Clarification has also been provided to give the operator direction in the event of multiple failures, or additional failures with one channel of RPS in channel bypass.

- Note 6 associated with TS Table 3.5.1-1 has been revised and now refers to the actions specified by Column 5 of Table 3.5.1-1 if the requirements of Note 6 cannot be met.

- The Bases associated with the RPS have been modified to incorporate a discussion of the actions required upon discovery of inoperable functions or components in RPS and the available options for operating the RPS with inoperable functions.

- The Bases associated with the EFIC system have been modified to discuss operation of the EFIC system maintenance bypass when any one RPS channel contains inoperable functions in the untripped state.

BACKGROUND

Reactor Protection System (RPS)

The RPS is described in section 7.1.2 of the ANO-1 Safety Analysis Report (SAR). A recent review of the RPS was performed by the NRC in conjunction with Babcock & Wilcox topical report BAW-10167A and Supplement 1, "Justification for Increasing the Reactor Trip System On-Line Test Interval" and Supplement 2, "Justification for Increasing the Reactor Trip System On-Line Test Interval - Additional Information on Allowed Outage Time."

The RPS monitors parameters related to safe operation and trips the reactor to protect the reactor core against fuel rod cladding damage. It also assists in protecting against Reactor Coolant System (RCS) damage caused by high system pressure by limiting energy input to the system through reactor trip action. The RPS is designed to provide the necessary protection to ensure that certain safety limits and accident analysis acceptance criteria are not violated. The three safety limits protected by RPS are high reactor coolant pressure, departure from nucleate boiling ratio (DNBR) and linear heat rate (kw/ft).

The RPS also provides signals to the following systems:

- RCS flow and neutron power levels are provided to the Integrated Control System (ICS),
- Narrow range RCS pressure signal is provided to non-nuclear instrumentation to regulate the RCS pressure,
- Main Feedwater (MFW) pump status, Reactor Coolant Pump (RCP) status, neutron power >10% Full Power, and RPS channel bypass status are provided to EFIC, and
- A wide range RCS hot leg temperature signal is provided to the margin-to-saturation monitors.

The RPS consists of four identical protection channels (A, B, C, and D), each terminating in a trip relay within a Reactor Trip (RT) module. In the normal untripped state, each protection channel passes current to the terminating trip relay and holds it energized as long as all inputs are in the normal energized (untripped) state. Should any one or more inputs become de-energized (tripped), the terminating relay in that protective channel de-energizes (trips). Each protection channel trip relay has four logic controlling contacts, each controlling a logic relay in one RT module. Therefore, each RT module has four logic relays controlled by the four protection channels. The four logic relays combine to form a 2-out-of-4 coincidence network in each RT module. The coincidence logic in each RT module trips whenever two of the four protection channels trip. Each of the RT modules (2-out-of-4 logic networks) controls a control rod drive power supply breaker or contactor. Thus, a trip in any two of the four protection channels initiates a trip of all the power supply breakers and contactors.

The use of 2-out-of-4 logic between protection channels permits a channel to be tested on-line without initiating a reactor trip signal. Maintenance to the extent of removing and replacing any module within a protection channel may also be accomplished in the on-line state without a reactor trip. To prevent either the on-line testing or maintenance features from creating a means for unintentionally negating protective actions, a system of interlocks initiates a protection channel trip whenever a module is placed in the test mode or is removed from the system unless the channel is bypassed.

Each protection channel is provided with a channel bypass switch. The channel bypass switch enables a protection channel to be bypassed without initiating a trip. Actuation of the switch initiates a visual alarm on the main console, cabinet alarm lamp panel and internally in the cabinet. The alarm remains in effect for the duration of any channel bypass. The key switch is normally used to bypass one protection channel during on-line testing. Thus, during on-line testing the system will operate in a 2-out-of-3 coincidence. The channel bypass key switches are interlocked in such a way that, if one channel key operated switch is in the channel bypass position, placing another channel key operated bypass switch in the channel bypass position will have no effect.

When a single protection channel fails, the system is left in either a 2-out-of-3 logic mode (if the channel fails to trip) or 1-out-of-3 logic mode (if the channel trips). As discussed in

section 7.1.2 of the ANO-1 SAR, failure mode and effects analysis of the RT module has demonstrated that single failures within the RT module or in its interconnections can produce one or more of the following:

1. Trip of the breaker associated with the RT module,
2. Placing the RPS in a 2-out-of-3 mode as if the associated protection channel had been placed in channel bypass, or had suffered a cannot trip type of failure,
3. Placing the RPS in a 1-out-of-3 mode as if the associated protection channel had tripped. Physical removal of a component associated with a single protection channel will leave the remaining components and protective channels operational in a 1-out-of-3 mode.

The combination of RT modules and control rod drive power supply breakers and contactors form a 1-out-of-2 x 2 logic. At this level the system will tolerate a cannot trip type of failure of one RT module, or of the breaker and/or contactors associated with one RT module without degrading the system's ability to trip all control rods. The failure analysis demonstrates that no single failure involving a RT module will prevent its associated breakers and contactors from opening.

Emergency Feedwater Initiation And Control (EFIC) System

The EFIC system is described in section 7.1.4 of the ANO-1 SAR. The ANO-1 EFIC system is an instrumentation system which monitors selected plant conditions and automatically initiates the Emergency Feedwater (EFW) system and Main Steam Line Isolation (MSLI) components upon detection of abnormal conditions. In addition, the EFIC system automatically controls EFW delivery, so as to maintain heat removal capability, by maintaining appropriate Once Through Steam Generator (OTSG) levels.

The EFIC system is designed to provide:

- Initiation of EFW,
- Control of EFW flowrate to the OTSGs to control level at appropriate setpoints,
- OTSG level rate control when required to minimize overcooling,
- The selection of appropriate OTSG(s) under conditions of steam line break or main feedwater or emergency feedwater line break downstream of the last check valve,
- Control of atmospheric dump valves to a pre-determined OTSG pressure setpoint,
- Signals for isolation of the main steam and main feedwater lines of a depressurized OTSG.

The EFW protective function is actuated by any of the following eight conditions:

- "A" OTSG level low
- "B" OTSG level low
- "A" OTSG pressure low
- "B" OTSG pressure low
- Loss of both MFW Pumps (when >10% full power)
- Loss of all four Reactor Coolant Pumps
- Engineered Safeguards Actuation System (ESAS)
- Diverse Reactor Overpressure Prevention System/ Anticipated Transient Without Scram Mitigation System Actuation Circuitry (DROPS/AMSAC)

The EFIC system consists of four channels (A, B, C, and D). Each of the four channels are provided with input, initiate, and vector logics. Channels A and B also contain trip logics and control logics associated with EFIC Train "A" and "B", respectively. Each channel monitors inputs by means of the input logic, ascertains whether action should be initiated by means of the initiate logic, and determines which OTSG should be fed by means of the vector logic. Channels A and B monitor initiate signals from each of the four initiate logics by means of the trip logics and transmit trip signals when required. Channel A and B also exercise control of EFW flow to the OTSGs by means of control logics to maintain level at prescribed values once EFW has been initiated.

Each train of EFIC (A and B) is provided with three 1-out-of-2 x 2 trip logic networks. The trip combination in Train "A" is (A or B) and (C or D). The trip combination in Train "B" is (A or C) and (B or D). These networks monitor the appropriate outputs of the initiate logics in each of the channels and output signals for initiating EFW, OTSG "A" main steam line isolation, and OTSG "B" main steam line isolation. For each trip function, the trip logic is provided with two manual trip switches. This affords the operator with a means of manually tripping a selected function by depressing both switches. The use of two trip switches allows for testing the trip switches and also reduces the possibility of accidental manual initiation.

The number of components which can fail in a single instrument channel is small. The redundancy of the logic and the division of the devices forms a system having two parallel protective trains either of which is capable of performing the required functions. The built-in test facilities permit complete electrical testing of each channel during normal power operation. Each EFIC channel is equipped with a key-locked maintenance bypass switch. One EFIC channel may be placed in maintenance bypass prior to testing, effecting a 1-out-of-1 and 1-out-of-2 trip logic on the remaining three channels. An interlock feature prevents placing more than one channel at a time in maintenance bypass. Placing an RPS channel in channel bypass allows only the associated EFIC channel to be placed in maintenance bypass through an additional interlock feature which gives RPS channel bypass status override rights over EFIC maintenance bypass.

DISCUSSION OF CHANGE

TS 3.5.1.3, as currently written, could be interpreted to require that any RPS channel undergoing on-line testing or any protection instrument or channel failure be placed in channel bypass. This appears to be in conflict with Note 6 associated with TS Table 3.5.1-1, which allows reducing the number of operable channels to two provided one channel is placed in channel bypass and one channel is manually tripped. Changing TS 3.5.1.3 to read "For on-line testing or in the event of a protection instrument failure or channel failure, a key operated channel bypass switch associated with each reactor protection channel may be used to lock the channel trip relay in the untripped state as indicated by a light" will result in additional flexibility in the operation of the plant. This change will allow a single inoperable channel to be placed in channel bypass, in the manually tripped state, or to remain in operation in a "degraded" condition as determined by evaluation, plant conditions, and management approval. This change will also allow a channel undergoing testing to be placed in either channel bypass or in the manually tripped state as determined by existing plant conditions and management review. The optional use of the RPS channel bypass is allowed by the Oconee Technical Specifications - initial issue.

Placing the channel undergoing testing or experiencing a failure in channel bypass results in placing the RPS in a 2-out-of-3 trip logic configuration. Placing the affected channel in the manual trip condition would be a more restrictive condition in that the RPS would be placed in a 1-out-of-3 trip logic configuration. These conditions are acceptable as the RPS is still capable of initiating a reactor trip upon receipt of trip parameters taking into account a single failure in the RPS. This change will also allow one channel of RPS to continue to operate in the untripped state with a failed function. Failure of components or functions within a channel of RPS can result in one or more of the following results:

- A trip of the breaker associated with the trip module in the affected RPS channel,
- Placing the RPS in a 1-out-of-3 trip logic mode as if the associated RPS channel had tripped, or
- Placing the RPS in a 2-out-of-3 trip logic mode as if the associated RPS channel had been placed in channel bypass or had suffered a cannot trip type of failure.

The first two types of failures result in a condition that is at least equivalent to placing the affected channel in manual trip. The third type of failure, characterized as a failure of a function which does not result in a channel trip, is equivalent to placing the channel in channel bypass for that function only. All other functions in the affected channel are still operable. This results in a 2-out-of-3 trip logic condition for the failed function and a 2-out-of-4 trip logic for all remaining functions in the affected protection channel. For example, if the "A" RPS channel experienced a failure such that the reactor trip function on high Reactor Building pressure became inoperable in an untripped state, the RPS trip logic would become 2-out-of-3 for high Reactor Building pressure, and would remain in a 2-out-of-4 state for all other functions in the RPS. Although ANO-1 is analyzed for operation indefinitely in the 2-out-of-3 trip logic mode, operation in this mode (channel unbypassed in an untripped state) will result

in additional conservatism as the remainder of the channel functions remain in a normal 2-out-of-4 trip logic mode.

From this discussion, it follows that operation with any inoperable function unbypassed in an untripped state is equivalent to a channel bypass function limited to that function alone. Therefore, TS 3.5.1.3 has been further revised to require that "Only one channel shall be locked in the untripped state or contain inoperable functions in the untripped state at any one time." This requirement prevents operation with an inoperable function in the untripped state in one channel of RPS and either placing another RPS channel in channel bypass or operating with an inoperable function in the untripped state in another RPS channel. This preserves the minimum trip logic of 2-out-of-3 unless one of the two affected RPS channels is placed in the tripped condition in accordance with Note 6 of TS Table 3.5.1-1 (in which case the trip logic becomes 1-out-of-2). TS 3.5.1.3 has also been modified to require the operator to tag the remaining RPS key operated channel bypass switches when operating with an inoperable function unbypassed in the untripped state. This requirement ensures that one of the remaining RPS channels will not be placed in channel bypass without prior management approval consistent with the requirements of TS Table 3.5.1-1.

Upon discovery of an inoperable component or function in any channel of RPS, the condition is evaluated for channel and system operability as required by existing plant administrative procedures and TS. This review not only looks at the failure itself, but also includes an evaluation of the effect of any failure on interconnected systems. Should this evaluation determine that the failure would prevent the functioning of another system, the appropriate actions for the additional affected system are implemented. These actions can include bypassing or manually tripping the additional affected system. In the case of an RPS function failure, the additional systems that would require evaluation would include ICS, EFIC, RCS pressure control, and margin-to-saturation monitors.

In the case of the RPS and EFIC interface, one signal could require an action other than bypassing or tripping. This signal is the neutron power >10% signal that automatically arms the EFIC actuation of EFW upon a trip of both MFW pumps above 10% full power. Failure of the neutron power signal could result in unarming this EFIC actuation in the associated EFIC channel. Placing the affected EFIC channel in maintenance bypass is allowed for this condition. However, due to the interconnection of the RPS channel bypass switches and the EFIC maintenance bypass switches only the associated RPS channel and EFIC channel may be placed in maintenance bypass at the same time. This condition would require (by the current specification) tripping the affected EFIC channel during testing of any other EFIC or RPS channel and using the bypass function for the channel being tested. This results in placing the EFIC system in a "half-trip" state during testing, increasing the possibility of a spurious trip of the EFIC functions. Following approval of the attached TS change, a temporary modification to the affected RPS channel could be installed which would ensure the availability of the MFW pump trip function above 10% full power, by setting the RPS bistable output to the associated EFIC channel to a value equivalent to 100% full power.

The RPS channel bypass condition and the EFIC maintenance bypass condition are annunciated in the control room for the extent of the bypass operation. Operation with inoperable functions unbypassed in the untripped state in one channel of RPS would not be annunciated. Plant status board entries are used to ensure operations personnel are aware of operation with inoperable components. The status of inoperable functions unbypassed in the untripped state is an item that would be entered on the plant status boards. Operations philosophy with regard to placing systems or components in a bypassed condition for operation, maintenance, testing or failure is to check the status of redundant equipment to ensure operability prior to the bypass operation. Prior to placing any other channel of RPS or EFIC in the channel or maintenance bypass condition for on-line testing, the status of the redundant RPS and EFIC channels would continue to be reviewed prior to the bypass operation. In addition, during operation with an inoperable function in the untripped, unbypassed condition, the remaining RPS channel key-lock channel bypass switches will be "Hold Carded" (tagged) to prevent their operation without prior management approval consistent with the requirements of TS Table 3.5.1-1. Plant management continues to have the responsibility to approve operation with components in a failed or bypassed condition.

Currently, if any RPS channel is placed in channel bypass, only the associated EFIC channel may be placed in maintenance bypass. Should a failure occur in an RPS channel function or component which is not an input to the EFIC system, allowing the affected channel to operate in the untripped state will not preclude placing any channel of EFIC in maintenance bypass. For example, if the high Reactor Building pressure trip function in the "A" RPS failed in an untripped state, the evaluation would show that this function does not input to EFIC. Since all EFIC inputs from the appropriate RPS channel functions are operable, any channel of EFIC may be placed in maintenance bypass for on-line testing or component failure as allowed by TS 3.5.1.11 while the "A" RPS high Reactor Building pressure function is inoperable in the untripped condition.

TS 3.5.1.3 has been further clarified to incorporate the guidance of TS Table 3.5.1-1 Note 6 in the event of multiple failures, or in the event one channel of the affected system is placed in the bypass condition and a component fails in the untripped condition in another channel of the system. Should multiple channel function failures occur, or additional failures occur with one channel in bypass, the operator is required to implement the actions of Table 3.5.1-1 Note 6 within 1 hour. This will result in placing the RPS in a 1-out-of-2 trip logic within 1 hour. This change results in a clarification to the TS and is considered to be administrative in nature.

TS Table 3.5.1-1 Note 6 has been revised. The current Note 6 requires the Operator to apply Specification 3.3 in the event the RPS cannot be placed in a 1-out-of-2 coincidence. Specification 3.3 deals with the Emergency Core Cooling System components and has no applicability in this situation. The current wording existed in the initial issue of the ANO-1 TS. With this revision, Note 6 will direct the Operator to apply the action specified by Column 5 of Table 3.5.1-1 if the actions required by Note 6 cannot be accomplished. Column 5 of Table 3.5.1-1 refers to several Notes, depending on the system in question, which will place the plant in a safe condition for the inoperable system. If the RPS cannot be placed in a 1-out-of-2 coincidence as required by Note 6, the requirements of Columns 3 and 4 are not

met, and a shutdown would be initiated in accordance with Note 1 specified by Column 5. This change removes a misleading reference, gives guidance to place the plant in a mode where the affected instrumentation system is not required, and is considered to be administrative in nature.

The changes to the Bases of the RPS and EFIC TS include portions of the discussions above. This information is presented to clarify the TS as revised by this submittal.

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

An evaluation of the proposed change has been performed in accordance with 10CFR50.91(a)(1) regarding no significant hazards considerations using the standards in 10CFR50.92(c). A discussion of these standards as they relate to this amendment request follows:

Criterion 1 - Does Not Involve a Significant Increase in the Probability or Consequences of an Accident Previously Evaluated.

The RPS and EFIC system provide accident mitigation features and are not considered to be accident initiators. The accident mitigation features of the plant are not affected by the proposed amendment. In any configuration allowed by the revised specifications, the trip logic instituted on the RPS is at least equivalent to the trip logic instituted by placing a channel in channel or maintenance bypass. The RPS remains single-failure proof with one channel in channel bypass, manually tripped, or with an inoperable function unbypassed in the untripped state. Therefore, upon receipt of an initiating signal, a single failure will not prevent the proper actuation of RPS. Should a channel of RPS contain an inoperable function unbypassed in the untripped condition which does not affect an EFIC channel, any channel of EFIC may be placed in maintenance bypass. RPS and EFIC remain single-failure proof in this configuration.

Administrative controls are established to ensure that all inoperable RPS functions are evaluated for continued operation in the untripped state. Upon detection of a failed function in any channel of RPS, the administratively controlled condition reporting process evaluates the failure and its effect on other systems for continued operability. The operator is informed of the continuing status of inoperable functions through the use of Station Log entries and Plant Status board entries. In addition, during operation with an inoperable function in the untripped, unbypassed condition, the remaining RPS channel key-lock channel bypass switches will be "Hold Carded" (tagged) to prevent their operation without prior management approval consistent with the requirements of TS Table 3.5.1-1. Plant management maintains the responsibility to approve continued operation with inoperable functions unbypassed in the untripped state to ensure that the plant is operated in the safest configuration with regard to the extent of the failure, and the plant operating conditions. Prior to placing any channel of RPS or EFIC in bypass, the operator checks the status of redundant systems for operability and TS compliance and takes the proper action as required by existing plant conditions, plant operating procedures and TS.

The clarification to TS 3.5.1.3 which directs the operator to the appropriate actions if multiple channels become inoperable, or in the event of an inoperable channel or inoperable function occurring concurrent with one channel in bypass is considered to be administrative in nature. The change to Note 6 of Table 3.5.1-1 results in the correction of misleading information and directs the Operator to place the plant in a safe mode depending on the system which is affected by a failure, and is also considered to be administrative in nature. The Bases changes add additional information to clarify the specifications.

Therefore, this change does not involve a significant increase in the probability or consequences of any accident previously evaluated.

Criterion 2 - Does Not Create the Possibility of a New or Different Kind of Accident from any Previously Evaluated.

The probability or consequences of equipment important to safety malfunctioning will not be increased. In any configuration allowed by the revised specifications, the trip logic instituted on the RPS is at least equivalent to the trip logic instituted by placing a channel in channel bypass. The RPS remains single-failure proof with one channel in channel bypass, manually tripped, or with an inoperable function unbypassed in the untripped state. Therefore, upon receipt of an initiating signal, a single failure will not prevent the proper actuation of RPS. Should a channel of RPS contain an inoperable function unbypassed in the untripped condition which does not affect an EFIC channel, any channel of EFIC may be placed in maintenance bypass. RPS and EFIC remain single-failure proof in this configuration.

The clarification to TS 3.5.1.3 which directs the operator to the appropriate actions if multiple channels become inoperable, or in the event of an inoperable channel or inoperable function occurring concurrent with one channel in bypass is considered to be administrative in nature. The change to Note 6 of Table 3.5.1-1 is also considered to be administrative in nature, in that misleading information in the specification has been corrected to an appropriate requirement. The Bases changes add additional information to clarify the specifications.

Therefore, this change does not create the possibility of a new or different kind of accident from any previously evaluated.

Criterion 3 - Does Not Involve a Significant Reduction in the Margin of Safety.

The RPS and EFIC system have the same capabilities to mitigate and/or prevent accidents as they had prior to this proposed change. Allowing flexibility in the response to a function failure in one channel of RPS allows placing the plant in the safest operating condition for the existing plant conditions considering the extent of the function failure. Operation of an RPS channel with an inoperable function unbypassed in the untripped state results in placing the inoperable function in a 2-out-of-3 trip logic (equivalent to channel bypass) while the remainder of the RPS functions remain in the normal 2-out-of-4 trip logic. The ANO-1 RPS

has been reviewed as a 3 channel system with one channel in bypass. Implementing this change results in additional conservatism with respect to any postulated single-failures.

Administrative controls are established to ensure that all inoperable RPS functions are evaluated for continued operation in the untripped state. Upon detection of a failed function in any channel of RPS, the administratively controlled condition reporting process evaluates the failure and its effect on other systems for continued operability. The operator is informed of the continuing status of inoperable functions through the use of Station Log entries and Plant Status board entries. In addition, during operation with an inoperable function in the untripped, unbypassed condition, the remaining RPS channel key-lock channel bypass switches will be "Hold Carded" (tagged) to prevent their operation without prior management approval consistent with the requirements of TS Table 3.5.1-1. Plant management maintains the responsibility to approve continued operation with inoperable functions unbypassed in the untripped state to ensure that the plant is operated in the safest configuration with regard to the extent of the failure, and the plant operating conditions. Prior to placing any channel of RPS or EFIC in bypass, the operator checks the status of redundant systems for operability and TS compliance and takes the proper action as required by existing plant conditions, plant operating procedures and TS. Should a channel of RPS contain an inoperable function unbypassed in the untripped condition which does not affect an EFIC channel, any channel of EFIC may be placed in maintenance bypass. RPS and EFIC remain single-failure proof in this configuration.

The clarification to TS 3.5.1.3 which directs the operator to the appropriate actions if multiple channels become inoperable, or in the event of an inoperable channel or inoperable function occurring concurrent with one channel in bypass is considered to be administrative in nature. The change to Note 6 of Table 3.5.1-1 results in the correction of misleading information and directs the Operator to place the plant in a safe mode depending on the system which is affected by a failure, and is also considered to be administrative in nature. The Bases changes add additional information to clarify the specifications.

Therefore, this change does <u>not</u> involve a significant reduction in the margin of safety.

Based upon the reasoning presented above and the previous discussion of the amendment request, Entergy Operations has determined that the requested change does <u>not</u> involve a significant hazards consideration.