



PERRY NUCLEAR POWER PLANT

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U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Perry Nuclear Power Plant
Docket No. 50-440
Annual Report of 10 CFR 50.59
Safety Evaluations for 1993

Gentlemen:

Pursuant to 10 CFR 50.59(b)(2), enclosed is the report of facility changes, tests, and experiments for the Perry Nuclear Power Plant. Those changes, tests, and experiments reported are for the period September 19, 1992 through September 18, 1993, and in selected cases more recent evaluations.

This report summarizes a total of 176 safety evaluations, none of which resulted in the identification of an unreviewed safety question. The safety evaluations are numbered sequentially and those not included in this summary have either been voided, withdrawn or are still under consideration although not approved at this time. Attachment 1 lists the number of safety evaluations in major categories based on the type of item being evaluated. Attachment 2 defines the acronyms and format description. Attachment 3 provides the summaries of the safety evaluations described above.

If you have questions or require additional information, please contact Henry Hegrat - Regulatory Affairs at (216) 280-5606.

Very truly yours,

A handwritten signature in black ink, appearing to read "Robert A. Stratman".

RAS:JEE:cs

Attachments

cc: NRC Project Manager
NRC Resident Office
Region III

Operating Companies
Cleveland Electric Illuminating
Toledo Edison

148105
9403160073 940311
PDR ADOCK 05000440
R PDR

JE471

Summary of
1993 Perry Safety Evaluations
by Category

The safety evaluations are divided into the major categories listed below.

<u>Category</u>	<u>Number</u>	<u>Percentage of Total</u>
1. Design Changes (except setpoint changes)	55	31.3
2. Drawing Changes	15	8.5
3. USAR Changes	21	11.9
4. Procedure/Instruction Changes (revisions, temporary changes)	32	18.2
5. Lifted Lead & Jumper, Electrical Devices and Mechanical Foreign Item Changes	18	10.2
6. Nonconformance Report Evaluations	21	11.9
7. Temporary Test Instruction Evaluations	6	3.4
8. Miscellaneous	8	4.6
Total	176	100%

FORMAT DESCRIPTION

Each 50.59 Safety Evaluation summary is presented in the following format:

SE No.: A sequentially assigned number from one (001) to end of the period, preceded by the year; e.g. 86-025.

Source Document: There are several sources of evaluations which are abbreviated as shown.

DCN - Drawing Change Notice
DCP - Design Change Package
EP - Emergency Plan
FCR - Field Clarification Request
FPI - Pre-Fire Plan Instruction
FTI - Fuel Technical Instruction
ISS - Installation Standard Specification
LL&JED - Lifted Lead and Jumper and Electrical Device
MFI - Mechanical Foreign Item
NR - Nonconformance Report where S or N in the serial number indicates safety or nonsafety
PAP - Plant Administrative Procedure
PEI - Plant Emergency Instruction
PSP - Physical Security Plan
PSTG - Perry Specific Technical Guidelines
PTI - Periodic Test Instruction
SCN - Specification Change Notice
SCR - Setpoint Change Request
SOI - System Operating Instruction
SSCR - Safe Shutdown Capability Report
SVI - Surveillance Test Instruction
TAF - Technical Assignment file
TXI - Temporary Test Instruction
USAR CR - Updated Safety Analysis Report Change Request

Description of Change:

A short narrative describing the location and type of plant change.

Summary

- I. Response to 10 CFR 50.59(a)(2)(i) - is the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report increased?
- II. Response to 10 CFR 50.59 (a)(2)(ii) - is the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report created?
- III. Response to 10 CFR 50.59(a)(2)(iii) - is the margin of safety as defined in the basis for any Technical Specification reduced?

Attachment 3
PY-CEI/NRR-1756 L

PERRY NUCLEAR POWER PLANT

SAFETY EVALUATION SUMMARY

PURSUANT TO

10 CFR 50.59(b)(2)

1993

SE No.: 92-168

Source Document: PAP-1920, Rev. 4

Description of Change

This change to Plant Administrative Procedure (PAP)-1920, "Periodic Fire Inspection", improves and clarifies the fire inspection process.

Summary

- I. No. This administrative change does not alter any equipment or plant operating practice. It is consistent with all NRC and NFPA guidelines for the inspection process. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This change is administrative and does not affect the operation of any equipment required for safe shutdown. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This change does not affect any equipment or operating practice relied upon by Technical Specification. The Fire Protection Program is referenced under administrative controls sections 6.5.1.6 N, 6.5.2.8 E, and 6.8.1 H of the Technical Specifications. These changes were evaluated and found to be consistent with these Technical Specification sections and with the USAR. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 92-169

Source Document: NR 92-N-291, Rev. 0

Description of Change

This nonconformance report dispositions a leaking crack at a weld interface on the condensate (N21) header "Temporary Use-As-Is" until a repair can be made.

Summary

- I. No. The leaking weld has been inspected and found to pose no current plant operational problems. The crack will be observed on a routine basis to ensure it does not propagate. The weld area was evaluated and structural integrity of the piping is not impacted. The piping will still continue to deliver condensate at the required flow. The loss of feedwater flow transient (USAR 15.2.7) is not impacted. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this disposition.
- II. No. The piping and associated equipment will continue to perform its design function at the specified crack size. Leakage is adequately contained within the floor drain system's capability. The leakage and steam plume will not adversely affect any safety related equipment. Therefore, this disposition will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The condensate system is non-safety and is not addressed within Technical Specifications. Therefore, this disposition will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 92-170

Source Document: NR 92-N-285, Rev. 0

Description of Change

This nonconformance report dispositions the cracked and leaking Service Water (P41) strainer blowdown line "Temporary Use-As-Is" until it can be repaired.

Summary

- I. No. The Service Water system is non-safety related and is not required for safe shutdown. Isolation of the blowdown line in the case of a complete failure will not adversely affect the overall operation of this system, nor will it adversely impact any other plant systems. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this disposition.
- II. No. The potential flooding from a complete failure of this line will be contained by the Plant Catch Basin Storm Drainage (P67) system. No other systems or equipment will be adversely affected by this disposition. Therefore, this disposition will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The Service Water system will continue to function as required. No Technical Specification related equipment will be adversely affected by this disposition. Therefore, it will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 92-171
Source Document: NR 92-S-287, Rev. 0

Description of Change

This nonconformance report dispositions ball valve 2P45F0040B "Use-As-Is" with its actuator removed. This is a Unit 1/Unit 2 boundary valve which must remain closed in order to support Unit 1 operation.

Summary

- I. No. Overall system performance will remain unaffected by this disposition. The ball valve will continue to meet the design and construction standards for the Emergency Service Water (P45) system. The valve will remain in a closed position with its actuator removed. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. Operation of the P45 system will remain as designed and the stress analysis shows that the system remains within allowable code limits. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The P45 system is addressed by Technical Specification 7.1 and this disposition does not alter its basis. The P45 system will continue to operate as designed. Therefore, this disposition will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 92-172

Source Document: Security Plan, Rev. 17, TC-1

Description of Change

This change to the Security Plan has been evaluated to ensure that the effectiveness of the Perry Nuclear Power Plant Security Plan has not been reduced and to ensure that the requirements of 10 CFR 73, Physical Protection of Plants and Materials, continue to be met. Site Protection must be contacted for further details since this is considered "SAFEGUARDS" information.

Summary

- I. No. The Security Plan describes the comprehensive Physical Security Program and has no effect on the occurrence or consequences of an accident or malfunction of equipment.
- II. No. The Security Plan does not direct the operation of plant systems or equipment and, therefore, can not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The Security Plan can not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 92-174

Source Document: PSTG, Rev. 2, TC-2

Description of Change

This change to the Plant Specific Technical Guidelines (PSTG) removes ambiguity concerning the use of the hydrogen control equipment.

Summary

- I. No. Operation of the hydrogen control equipment is not affected by this change nor is any equipment altered. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This is an editorial change. It removes ambiguity and prevents the equipment from being operated in an unsafe manner. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This editorial change does not alter the requirement or the bases for hydrogen control equipment in Technical Specifications 3.3.7.5, 3.6.7.1, 3.6.7.2 or 3.6.7.3. Therefore this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 92-175

Source Document: SCRs 1-92-1182, 1183, 1184, 1185, 1186 and 1187

Description of Change

These setpoint changes alter the tolerance specified for the Emergency Service Water pump motor inverse time overcurrent relays to ensure that the pickup setting does not fall below the degraded voltage value.

Summary

- I. No. These SCRs will not alter the function, operation or operability of these relays. This tightening of the lower tolerance will ensure that the relays protect the motors during a degraded voltage condition. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. These setpoint changes simply tighten the tolerance associated with the setpoints for these relays. Therefore, these changes will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. These setpoint changes do not affect the Technical Specification associated with the ESW System. Therefore, they will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 92-178

Source Document: NR 92-S-301, Rev. 0
NR 92-S-302, Rev. 0

Description of Change

These nonconformance reports disposition ventilation system prefilters which were not processed as safety related, "Use-As-Is"

Summary

- I. No. These prefilters do not perform a safety related function. They are used to prolong the High Efficiency Particulate Air (HEPA) filter life during normal operation. No credit is taken for prefilters in the accident analyses. Failure of the prefilters will not affect the overall efficiency of the Engineered Safety Feature (ESF) filter trains as analyzed in the USAR. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. Failure of these prefilters will have no adverse affect on any ESF system or on any other component in the plant. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The out of service times specified for the ESF ventilation systems will not be exceeded by the failure of these prefilters. Therefore, this disposition will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 92-179

Source Document: NR 92-S-307, Rev. 0

Description of Change

This nonconformance report dispositions ball valve 2P45F0160 "Repaired and Use-As-Is" with its actuator removed. This is a Unit 1/Unit 2 boundary valve which must remain closed in order to support Unit 1 operation.

Summary

- I. No. Overall system performance will remain unaffected by this disposition. The ball valve will continue to meet the design and construction standards for the Emergency Service Water (P45) system. The valve will remain in a closed position with its actuator removed. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. Operation of the P45 system will remain as designed and the stress analysis shows that the system remains within allowable code limits. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The P45 system is addressed by Technical Specification 3.7.1 and this disposition does not alter its basis. The P45 system will continue to operate as designed. Therefore, this disposition will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 92-182

Source Document: Emergency Plan, Rev. 10, TC-7

Description of Change

This change to the Emergency Plan completely revises the Classification Flowchart and the Emergency Action Levels (EAL) listed in Table 4-1 to accommodate Revision 3 to Regulatory Guide 1.101.

Summary

- I. No. This change does not direct or affect the operation of any plant equipment necessary for safe shutdown. Only the classification of accidents is being altered, not the initiators. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This change does not alter the design nor affect the operation of the plant. Therefore, it will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This changes does not adversely affect any equipment or operation relied upon by Technical Specifications. Therefore, it will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 92-183

Source Document: PAP-1914, Rev. 5

Description of Change

These changes to Plant Administrative Procedure (PAP)-1914, "Fire Protection System Operability", incorporate the necessary information from PAP-1923, "Actions on Inoperable Fire Protection Systems", to establish PAP-1914 as the single source document governing fire system operability. This will result in the cancellation of PAP-1923.

Summary

- I. No. This administrative change does not alter any equipment or plant operating practices. It does not introduce any new fire hazards or change the combustible loading of any plant area. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This is an administrative change. No plant equipment or operating practices are changed. There, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This administrative changes does not affect the alternate shutdown equipment or methods discussed in the USAR or the Technical Specification. Therefore, this change will not reduce the margin of safety as defined in the bases for any the Technical Specification.

SE No.: 92-184
Source Document: NR 92-N-300, Rev. 0

Description of Change

This nonconformance report dispositions a linear indication on a 3/8" section of Mixed-Bed Demineralizer (P22) piping "Use-As-Is" and "Repair".

Summary

- I. No. This piping is non-safety. The indication is not believed to extend into the minimum wall thickness and it does not adversely affect the function or operating of the P22 system. Additionally, this system is not relied upon in the safety analyses. Therefore, neither the probability of occurrence nor the consequences of previously analyzed accident will be increased by this disposition.
- II. No. This disposition does not adversely affect any equipment important to safety. In the unlikely event that the piping does fail, the P22 system is expected to remain operational and the leakage is not expected to adversely affect any other equipment relied upon for safe shutdown of the plant. Therefore, this disposition will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The P22 system is not addressed in the Technical Specification, nor are any licensing basis parameters affected by this condition. Therefore, this disposition will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 92-185

Source Document: NR 92-N-299, Rev. 0

Description of Change

This nonconformance report dispositions several Target Rock solenoid valves in the Post Accident Sampling (P87) system which exceed nameplate pressure and temperature ratings "Interim Use-As-Is" and "Use-As-Is".

Summary

- I. No. These valves have been hydrostatically tested and have been found to exceed the existing design requirement for external leakage. In the event of valve failure, check valves are provided to restrict reverse flow. Additionally, failure of the P87 system will not initiate any accident analyzed in the USAR. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this disposition.
- II. No. The P87 system is not relied upon for safe shutdown of the plant. This disposition will not lead to any failure which could adversely affect any equipment important to safety. Therefore, this disposition will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. Technical Specification 6.8.4.c governs the administrative aspects of the P87 system. This disposition will have no affect on these requirements. Therefore, it will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 92-186

Source Document: DCP 88-119, Rev. 2

Description of Change

This revision to the design change eliminates one of the nine Underdrain (P72) system pumps.

Summary

- I. No. The P72 system is oversized with respect to pumping capacity. It will continue to perform its design function with one less pump. With the failure of all nine of the original pumps, the P72 system will still meet its design function assuming simultaneous Unit 1 and Unit 2 circulating water line breaks. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. Operation with one less pump will continue to satisfy design requirements. In fact, loss of all nine pumps will not result in the groundwater level rising above the specified limit. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The plant underdrain system including both the pumped and the gravity discharge subsystems is not addressed in Technical Specifications. Inoperability of one pump will not affect the system's ability to perform its design function. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 92-190

Source Document: DCP 92-026, Rev. 0

Description of Change

This design change deletes the LOCA auto-start feature for the Emergency Service Water (ESW) screens (OP49-D001A/B) and screen wash pumps (OP49-C002A/B).

Summary

- I. No. This design change will improve voltage availability to the OP49 equipment during LOCA responses with offsite power present. The total post-LOCA load will be slightly decreased by this change. The net effect will be increased reliability of the OP49 equipment post-LOCA. Auto initiation, due to level variance and manual initiation post-LOOP via the control switch will remain unchanged by this modification. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This design change will not result in the OP49 system becoming unavailable during normal operations or post-LOCA/LOOP. Even if both screen wash subsystems were to become inoperable, there is a high probability that the traveling screens will remain clean for a period of at least 72 hours. There is more than sufficient time to manually rotate screens and clean them using an alternate water supply as necessary. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously.
- III. No. The P49 system is not addressed in Technical Specifications. Complete operability of the screen wash system is not required to ensure operability of the P45 system. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 92-191

Source Document: DCP 92-074, Rev. 0

Description of Change

This design change modifies the Feedwater Sample Probe (B21) by shortening it and by using a seal welded collar at the point of attachment.

Summary

- I. No. This modification will decrease the probability of future failures of this probe by increasing its structural integrity. The modified probe meets design requirements for sampling. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The probability of probe failure is greatly reduced by this modification. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. System and plant operation will remain unaffected by this modification. The probe will be less likely to fail. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 92-192

Source Document: DCP 89-039, Rev. 0

Description of Change

This design change adds temperature control valves (TCV) to the Nuclear Closed Cooling (P43) lines supplying the lube oil coolers for the Service (P51) and Instrument Air (P52) compressors in order to provide automatic regulation of the cooling flow.

Summary

- I. No. Automatic flow regulation provided by the TCVs to maintain oil temperature in the desired operating range will improve compressor reliability since operator action will no longer be required to throttle manual valves to accomplish the same function. This DCP will eliminate the potential for a trip of an auto started unit due to unregulated flow shortly after the compressor starts. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. There will be no adverse operational impact on the P43 system operation. This system will remain at least as reliable as it was without the TCVs. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This change will not alter the function or the overall operation of any of the systems involved. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 92-193

Source Document: TXI-0149, Rev. 0

Description of Change

This Temporary Instruction (TXI)-0149, "Determining Fuel Pool and Containment Pool Grace Time", is designed to determine the heatup rate of the Fuel Handling Building and Upper Containment Pools with the Fuel Pool Cooling and Cleanup (FPCC) System secured.

Summary

- I. No. No accident analyzed in Chapter 15 of the USAR taken credit for FPCC operation. All actions specified in this procedure fall within the scope of normal system operation and all FPCC instrumentation will remain available during the performance of this test. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. All actions specified fall within the scope of normal system operation. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. There is sufficient time to restart FPCC if the TXI limit of 98°F is reached in order to prevent exceeding the Technical Specification limit of 100°F. Staying below this limit ensures that this test will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-001

Source Document: DCP 91-277, Rev. 0

Description of Change

DCP 91-277, Rev. 1 supersedes this change. See SE No. 93-012.

SE No.: 93-002

Source Document: DCP 91-054, Rev. 0

Description of Change

This design change modifies the Main Steam Isolation Valve (MSIV) Leakage Control (E32) system to reduce boundary leakage and to facilitate Local Leak Rate Testing (LLRT).

Summary

- I. No. These changes meet applicable design criteria. They provide a system configuration that is equivalent to the original design while providing enhancements for minimizing main steam line penetration leakage and for snubber optimization. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. These changes actually result in the elimination of some postulated pipe breaks without adding any new ones. The net affect is the reduction of main steam line penetration leakage without compromising system function or integrity. Therefore, these changes will not create the possibility for an accident or malfunctions of a different type than any previously evaluated.
- III. No. These modifications reduce main steam line penetration leakage without compromising the structural integrity of the reactor coolant pressure boundary. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-003

Source Document: DCP 91-197, Rev. 0

Description of Change

This design change installs Fire Suppression (P54) system branch lines and sprinklers in the Intermediate Building (IB) 571' level to accommodate increased combustible loading in thi area.

Summary

- I. No. This change will not degrade or adversely affect the design of the existing P54 equipment. This installation will meet appropriate criteria including the requirements contained in USAR Section 9A.5. The floor drains in the area are sufficient to prevent flooding following actuation of the sprinklers. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. There is no safe shutdown equipment located in the affected fire zone. The sprinkler system is designed to suppress and control the fire within this zone. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The addition of this sprinkler system enhances the overall capability to protect the plant from fire damage. The installation will not adversely affect any Technical Specification required equipment. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-004

Source Document: DCP 92-184, Rev. 0

Description of Change

This design change will activate spare wires, optical isolators, terminals and an annunciator window to install an alarm designated Suppression Pool Overflow. During refuel outages water from other pools is stored in the suppression pool causing a high level condition. The new annunciator will alert the reactor operator prior to the suppression pool over flowing the weir wall and spilling water into the drywell.

Summary

- I. No. This is an alarm only. It will be optically isolated from the safety related circuitry. It will not control or affect any equipment in the plant. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This alarm is optically isolated from safety related circuitry. It has been evaluated and used during past refueling outages under an approved Lifted Lead & Jumper (MFI/LLJED). It has no effect on any equipment. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This design change converts a temporary alarm into a permanent alarm. This alarm is not described in Technical Specification and it does not affect any Technical Specification equipment. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-005

Source Document: DCN 4080, Rev. 0

Description of Change

This drawing change corrects the mislabeling of two valves on P&ID D-302-604, Reactor Recirculation System.

Summary

- I. No. The configuration in the field is correct and all other supporting documentation is correct. The mislabeling was limited to this drawing. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. No equipment is altered by this change, nor are any operational changes being made. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This is an editorial change to a drawing. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-006

Source Document: MFI 1-92-091, Rev. 0

Description of Change

This Mechanical Foreign Item will allow installation of a 5 horsepower, 250 gpm, 300 lb. pump in the reactor vessel during a forced outage to minimize thermal stratification in the core with only the fuel pool closed cooling system available for heat removal.

Summary

- I. No. The pump will be properly supported and wired. The LOCA, Loss of AC Power and Seismic analyses are not affected by this installation. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The pump will not be installed near moving equipment that is important to safety. The Alarm Response Instruction (ARI) provides guidance for low vessel level in the event the water level decreases below the required level. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This installation aids the G41 system in removing heat and minimizing stratification within the vessel. The temporary pump and hose have no adverse impact on any Technical Specification required equipment or operation. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-007
Source Document: DCP 92-043, Rev. 0

Description of Change

This design change will allow the plant to be placed in a condition that will more easily allow Containment Integrated Leak Rate Testing (CILkT) to be performed. It consists of changing 1E51F0068 from a remote-manual to an automatic valve, taking credit for E51F0078 and E12F0102 as containment isolation valves and including flange E51D0023 into the containment isolation tables.

Summary

- I. No. This change automates a remote manual function required when high drywell pressure and low reactor pressure exist. Safety Evaluation 92-097 provide for locking close valve E12F0102. Taking credit for E51F0078 as an automatic isolation valve and E12F0102 as a locked closed manual isolation valve will change the isolation arrangements of the four affected penetrations, but will still allow each penetration to meets its originally specified design criteria. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. Only the closure of valve E51F0068 is changed. The interlocks for this valve remain in effect. The E12F0102 valve is presently locked closed under DCN 3755. The function and operation of the Reactor Core Isolation Cooling (RCIC) system remains essentially unchanged. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The function and operation of RCIC remain essentially unchanged. Allowing E51F0068 to automatically close will provide a greater margin of safety by removing protected human error. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-008

Source Document: DCP 91-155, Rev. 0
SCRs 0-91-1071 through 1074

Description of Change

This design change deletes the low pressure trip and alarm for the waste feed and waste dewatering pumps in the Solid Radwaste (G51) system.

Summary

- I. No. These trips and alarms were designed for operation of the original G51 system. This system never operated and was converted for use with a vendor supplied liner system. The trips and alarms being modified hinder operation of the vendor system. Their elimination will improve system operation and will actually reduce the probability of a radioactive spill by eliminating a major cause of system blockage. The failure of this portion of the radwaste system is bounded by the accident analyses in USAR Chapter 15. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. These changes have no impact on equipment impacted to safety. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. Eliminating these trips and alarms does not affect any equipment or operation described in the Technical Specification. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-009

Source Document: DCN 4045, Rev. 0

Description of Change

This drawing change revises P&ID D-302-110, Condensate Demineralizer System to accurately depict valves 1N24F0746A and B as relief valves rather than gate valves.

Summary

- I. No. This drawing change simply updates the drawing to reflect actual, approved field conditions. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This is simply a drawing change. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This drawing change does not affect Technical Specification. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-010

Source Document: DCP 85-098, Rev. 9

Description of Change

This design change adds a backwash flow control valve, flow element and temperature element to the backwash line of the Cation Regeneration Tank to improve system control.

Summary

- I. No. This change will improve control and result in less waste being generated. The failure of the regeneration portion of the Condensate Demineralizer (N24) system will not affect the plant's ability to mitigate the consequences of any accident. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The regeneration position of the N24 system is non-safety related and has no affect on equipment important to safety. This change enhances the performance of the resin backwash process. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The regeneration portion of the N24 system is not addressed by Technical Specifications. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-011

Source Document: DCP 92-213, Rev. 0

Description of Change

This design change replaces Residual Heat Removal (RHR) system gate valve 1E12F024B with a globe valve to increase reliability of the valve fully seating.

Summary

- I. No. The replacement valve design has been determined to be acceptable for this application. The piping loads and internal valve loads resulting from this valve replacement have been demonstrated not to result in exceeding ASME code allowable stresses. The replacement valve will be installed and tested in accordance with the design and quality assurance requirements of the original construction code such that replacement installation does not compromise the originally evaluated design. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The design change maintains the requirements of the original equipment design and construction codes. It utilizes equipment of proven reliability for this particular application. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This change improves the reliability of the 1E12F024B valve closing properly. It does not adversely affect any equipment specified in the Technical Specifications. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-012

Source Document: DCP 91-277, Revs. 0 and 1

Description of Change

This design change modifies the Reactor Water Cleanup (G33) system's regenerative and non-regenerative heat exchangers to provide positive isolation of the drain lines and to facilitate maintenance.

Summary

- I. No. These modifications will not change any functional or operating parameters of the system. The vent and drain lines are used during maintenance to drain the heat exchangers and related piping. These portions of the G33 system are classified as ASME, non-safety related piping. The relief valve removal involves a redundant relief valve. Relief capacity remains adequate. The analyses for flooding, jet impingement, leak detection and fire suppression are not altered by other modifications. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The piping, valves and flanges will be installed or altered in accordance with accepted codes and standards. The modifications have no significant affect on dose rates or heat loads in the room. The analyses for flooding, jet impingement, leak detection and fire suppression remain unaffected. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. Technical Specification addressing reactor water chemistry and activity are not affected by these modifications. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-013

Source Document: DCP 91-112, Rev. 0

Description of Change

This design change adds vent valves to the non-safety portions of the Diesel Generator Starting Air (R44) and the High Pressure Core Spray Starting Air (E22) systems to allow reverse flow leak testing of several valves.

Summary

- I. No. These non-safety portions of the starting air systems will continue to meet ANSI B31.1 and will have no impact on diesel generator operation or availability. These non-safety piping runs are not relied upon to provide diesel starting air under accident conditions. The safety related receiver tanks provide the necessary air volume under accident conditions. Check valves provide isolation of the receiver tanks from this non-safety piping. Current analysis assumes the loss of the non-safety piping. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This modification does not adversely affect the original system design or operation. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. System design requirement and operation remain the same. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-015

Source Document: NR 93-S-028, Rev. 0

Description of Change

A design change (DCP 87-204A) added a jumper to the operator for MOV 1B21F0019 to allow the Torque Switch (TS) to be removed for testing without affecting the TS balance. The design drawings were not updated to reflect this change. This nonconformance report was written to identify this drawing discrepancy.

Summary

- I. No. The wiring change was approved using Safety Evaluation 88-202 in conjunction with DCP 87-204A. This change simply updates the drawing to reflect the approved as-built condition. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This is simply a drawing change to reflect as-built condition. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. Technical Specifications are not affected by this change nor is any equipment or operation. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-016

Source Document: RWI-G50(WCS), Rev. 1, TC-1

Description of Change

This procedure change to Radwaste Instruction (RWI)-G50 (WCS) "Chemical Waste System", will allow the use of carbon in the radwaste Waste Demineralizer to reduce total organic carbon levels.

Summary

- I. No. No physical changes are required to implement this change. The carbon is placed on top of the resin. It is removed and processed in the same manner as the resin. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The carbon will improve the efficiency of the Waste Demineralizer. It will not adversely affect any equipment. Radioactive loading of the carbon/resin mix will remain within evaluated levels. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This change will improve effluent quality and will not adversely affect system operation. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-017

Source Document: TXI-0150, Rev. 0

Description of Change

This Temporary Instruction (TXI)-0150, "Testing of 1E12-F0024A(B) and 1E12-F0064A(B) without the Minimum Flow Time Delay Logic of Eight Seconds Activated" provides for testing 1E12-F024A(B) and F064A(B) with the minimum flow time delay logic deactivated.

Summary

- I. No. This is an instruction to allow for the collection of data at various flow rates between minimum flow and full flow while operating the Suppression Pool Test Mode of RHR. All of the interlocks are still active with respect to system operations and pump protection. The minimum flow valve will still respond under minimum flow conditions with a time delay of zero seconds rather than eight seconds. The Operational capabilities of the equipment within the system to provide flow, pressure, cooldown rates, and reaction times under accident conditions are still active under this instruction. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The purpose of this instruction is to collect data for the evaluation of the RHR A(B) Suppression Pool Test Return Valves [1E12-F0024A(B)]. The methods used to collect the data are consistent with the methods used for system operation in accordance with design requirements. The zero time delay will prevent the RHR pump from dead heading. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This is a data collection instruction. The time delay associated with an Agastat relay is being tested to satisfy calibration and logic system function requirements of Technical Specification System operation and pump protection are not adversely affected. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-018

Source Document: NR 92-S-012, Rev. 3

Description of Change

This nonconformance report allows the "Temporary Use-As-Is" for a 1 inch nominal tube in the Control Complex Chiller Water (P47) system. The installed 1 inch O.D. copper tubing transports oil to various components on the P47 compressor motor.

Summary

- I. No. The installed tube was found to meet the minimum wall thickness in all locations. The discrepancy is that it doesn't exceed minimum wall thickness by factor of 1-66. Because it meets minimum wall thickness, and because it is not subject to erosion/corrosion degrading it will maintain pressure integrity through April 24, 1993, when it will be replaced. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The tubing is stable under normal vibrational loads as well as seismic loads and it is not susceptible to erosion/corrosion in this application. Therefore, the tubing will maintain pressure integrity and this disposition will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The P47 system as well as the system it supplies will remain unaffected by this disposition. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-019

Source Document: DCN 4091, Rev. 0

Description of Change

This drawing change to P&ID D-302-739, Liquid Radwaste Sumps, reflects the as-built plant. The drain line from the Control Rod Drive (C11) Scram Discharge Volume was relocated from the Equipment Drain Sump to the Suppression Pool during initial plant design and the plant was licensed with this changed design.

Summary

- I. No. This change is editorial. The drain line is installed properly in the correct location. Changing the P&ID to reflect this design will not affect the operation of any equipment. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. Removal of the information from this drawing will not affect plant operation or control in any way. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This change does not affect the operation of any equipment. It is strictly an editorial change to the USAR. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-021

Source Document: PAP-0501, Rev. 7; PAP-0502, Rev. 8; PAP-0507, Rev. 9

Description of Change

Changes to Plant Administrative Procedures (PAP)-0501, 0502 and 0507 are being made to restructure the procedure hierarchy and to modify procedure processing methods. These administrative changes do not change the content, intent, interpretation or established commitments contained in the Operations Manual.

Summary

- I. No. These changes are administrative. They will not modify the physical plant nor will they lessen the PORC review requirements for changing procedures. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. These changes do not affect the operation or control of any equipment. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. These changes are administrative and do not affect Technical Specification. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-023

Source Document: Emergency Plan, Rev. 11

Description of Change

Several changes are being made to the format of the Emergency Plan to make it more consistent with other plant procedures.

Summary

- I. No. These changes do not alter the scope or contents of the Emergency Plan. They are administrative in nature and are intended to make the Plan easier to use and to revise. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. These changes do not alter the operation or the configuration of the plant. Therefore, they will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. These changes do not affect any equipment or operation relied upon in the Technical Specification. Therefore, they will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-024

Source Document: SOI-M14, Rev. 10, TC-3

Description of Change

This change to System Operating Instruction (SOI)-M14 "Containment Vessel and Drywell Purge System", eliminated the requirement to operate the Containment Vessel and Drywell Purge (M14) system at full flow prior to personnel entry into the drywell and during refueling activities.

Summary

- I. No. No changes are being made to the hardware. The accident analysis assumes full flow and isolation within 20 seconds of an accident initiation. A lower flow rate would lessen the release following a fuel handling accident. The isolation will still occur within 20 seconds because of the Containment Vessel Cooling (M11) and Drywell Cooling (M13) operation. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. Compensatory actions include operating the M11 and M13 systems when M14 is not operated prior to personnel entry. This will ensure adequate air flow and cooling. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. No changes are being made to the M14 system isolation logic. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

605A

SE No.: 93-025

Source Document: FCR 17384

Description of Change

This Field Change installs a freeze seal on the reactor vessel bottom head drain piping to allow maintenance on Reactor Water Cleanup (G33) valves.

Summary

- I. No. The freeze seal will be applied in accordance with the criteria contained in approved plant procedures. It serves as a backup to installed isolation valves which are closed. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. Loss of the freeze seal would result in no more leakage than presently exists past several leaking isolation valves. Makeup is more than adequate to compensate for this leakage. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The water level in the reactor will not be adversely affected by this temporary freeze seal, nor with any other equipment required by Technical Specification. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-026

Source Document: TXI-0153, Rev. 0

Description of Change

This Temporary Instruction (TXI)-0153, "Suppression Pool Bottom Vacuuming", provides for vacuuming the suppression pool bottom using the Pacific Nuclear Torus Cleanup System (TCS).

Summary

- I. No. The TCS is equivalent to the vacuum normally used for the tank. The difference will be that the waste will be pumped through a High Integrity Container (HIC) rather than through cartridge filters. The processing of waste in an HIC has been previously evaluated and determined to be acceptable. The plant will remain in a normal shutdown condition during this evolution. All of the water removed from the suppression pool will be returned to the suppression pool. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The vacuuming activities will not adversely affect any equipment important to safety. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. These activities will not affect any equipment required by Technical Specifications while the plant is shutdown. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-027

Source Document: DCP 92-043, Rev. 1

Description of Change

This design change allows the Local Leak Rate Testing (LLRT) of valves 1E51F0078 and 1E12F0102 in the reverse direction.

Summary

- I. No. The reverse testing of these valves is an acceptable method per ASME Section XI. Any leakage will be properly categorized. The proposed activity does not change the system configuration nor does it alter the operational performance of any system. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. There are no configuration or operational changes to the plant. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This method of testing is allowed by the ASME code. It does not adversely affect any other systems, structures or components relied upon in Technical Specifications, nor does it adversely affect the operation of any equipment. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-029

Source Document: DOSEPROJ 3.1

Description of Change

This change to DOSEPROJ revises the evacuation criteria based upon off-site dose following a release.

Summary

- I. No. DOSEPROJ is a software program used as a supplement for manual calculation of off-site doses and for determining protective actions in accordance with the Emergency Plan. This change to the program has been validated to ensure that it properly and accurately projects off-site dose. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This software does not affect any plant system, structure or component. The dose projections from this software have been verified to accurately predict off-site doses following a release. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The changes to this software do not adversely affect any system, structure or component identified in the Technical Specification. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-030

Source Document: DCP 92-213A, Rev. 0

Description of Change

This design change replaces Residual Heat Removal (RHR) system gate valve 1E12F024A with a globe valve to increases reliability of the valve fully seating.

Summary

- I. No. The replacement valve design has been determined to be acceptable for this application. The piping loads and internal valve loads resulting from this valve replacement have been demonstrated not to result in exceeding ASME code allowable stresses. The replacement valve will be installed and tested in accordance with the design and quality assurance requirements of the original construction code such that replacement installation does not compromise the originally evaluated design. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This design change maintains the requirements of the original equipment design and construction codes. It utilizes equipment of proven reliability for this particular application. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This change improves the reliability of the 1E12F024A valve closing properly. It does not adversely affect any equipment specified in the Technical Specifications. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-031

Source Document: DCP 91-177 B/C, Rev. 0
EDCR 91-7177

Description of Change

This design change allows the construction of a Low Level Radioactive Waste Storage and Processing Facility (LLRWSPF). This facility is intended for the processing and interior storage (5 years) of low level radioactive waste.

Summary

- I. No. The design, construction and use of the LLRWSPF are in compliance with the guidelines contained in Generic Letter (G.L.) 81-38. Complete failure of the facility has been analyzed and will not result in the generation of radiological conditions in excess of the Technical Specification limits. The Fire Protection aspects of the facility are in compliance with NFPA 13, NFPA 24, and the Fire Protection Program described in the USAR. No systems required for safe shutdown or for accident mitigation will be affected by the construction, use or failure of this facility. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. Facility failure has been analyzed and is in compliance with existing regulations/guidance. The effects of natural events have been analyzed and the facility is bounded by existing analyses. Safe shutdown and accident mitigation systems will not be impaired. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The LLRWSPF is not required for safe shutdown or accident mitigation. Failure of the structure or internal equipment will not adversely impact the capability to process or store radioactive waste. Further, failure does not impact the accident analysis as described in USAR Chapter 15.7. Administrative controls and the physical design of the LLRWSPF satisfy the criteria described in Technical Specifications. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-032

Source Document: DCP 92-011, Rev. 0

Description of Change

This design change removes the calibration stations, associated tubing, air supply and service water supply from the local H22 panels located in the Auxiliary Building.

Summary

- I. No. The calibration stations are not required and are not utilized by plant or I&C personnel to perform instrument calibrations. The calibration stations are non-safety related and are isolated from the safety related instrumentation. This design change will have no impact on plant operation. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The calibration stations are isolated during normal operation. Their removal will have no impact on the operation of the plant. Appropriate lines will be capped using approved codes. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The calibration stations are non-safety related and have no interaction with the plant shutdown capability. The removal of these stations will actually improve the ability of the instrument racks to withstand seismic loading. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-033

Source Document: DCP 88-005, Rev. 0
SCR's 1-90-1033 through 1048, 1056, 1087

Description of Change

This design change extends the Reactor Water Cleanup (RWCU) delta flow timer setpoint to 10 minutes and reconnects the containment room temperature switches. The increased timer setpoint will allow system perturbations to settle without isolating the system. The temperature switches will isolate the system if the flow rate increases substantially before the timer times out, indicating a line break.

Summary

I. No. These changes to the Leak Detection system enhance the reliability of the RWCU System by limiting unnecessary system isolations. The RWCU delta flow timer setpoint has been increased from 45 seconds to 10 minutes to allow the delta flow signal to stabilize during system startup conditions. The increased time has been analyzed concerning its impact on off-site doses, with the results showing that releases due to a possible leak for this time period, are well within PNPP's off-site dose limits.

The containment RWCU room temperature monitoring switches are being placed back in service to monitor for increased temperatures from a line break. The temperature increase could occur if the leak rate becomes greater than the heat removal capability of the system during the timer interval (10 min.). The temperature switches will isolate the RWCU system before any equipment damage occurs.

Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.

II. No. The changes to the leak detection system consist of an increase of an existing timer setpoint, and reconnection of existing room temperature switches, similar to other evaluated switches. These systems have been previously evaluated in the USAR. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.

III. No. The increased delta flow timer setpoint has been evaluated for impact on the off-site dose limits, with the results showing that the increase is well within the 10CFR100 limits. The technical specification table for isolation actuation instrument setpoints has been revised in Amendment No. 46 to our Operating License by the NRC. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-034

Source Document: SOI-E12, Rev. 7, TC-11

Description of Change

This change to System Operation Instruction (SOI)-E12, "Residual Heat Removal System", involves the operation of an RHR pump with its minimum flow valve incapable of opening. It replaces the requirement that the RHR pump breaker be racked out whenever the minimum flow valve is incapable of automatically opening with a requirement that either the RHR pump breaker be racked out or that additional monitoring be provided the RHR pump is operating to ensure that minimum flow requirements are met. In either case, the associated RHR pumps must be declared inoperable and the appropriate Technical Specification actions taken.

Summary

- I. No. The only accident analyzed in Chapter 15, of the USAR which evaluates RHR as a potential initiator is the inadvertent initiation of shutdown cooling analysis. Allowing the RHR pump breaker to be racked in with the minimum flow valve disabled does not increase the probability of this accident which is assumed to be caused by operator error.

This analysis also assumes that the RHR pump starts and operates at full design flow rate. During a startup of the RHR System to Shutdown Cooling, the minimum flow valves are closed and the shutdown cooling return valves are throttled to provide the equivalent flow prior to starting the RHR pump. This same condition will exist with the RHR pump breaker racked in and the minimum flow valves incapable of opening. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.

- II. No. RHR pump failure has already been evaluated in the USAR. This change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.

- III. No. The instruction requires declaring the associated RHR System inoperable and taking the required Technical Specification actions for an inoperable RHR Loop. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-035

Source Document: FTI-B05, Rev. 5

Software Change Request C91-93-3

Description of Change

This change to Fuel Management and Analysis Instruction (FTI)-B05, "Core Heat Balance", allows the use of the Main Feed Pump suction flow minus Recirculation flow indication to be used for total feedwater flow in the core heat balance calculation.

Summary

- I. No. The core thermal power calculated by this method will be used to calibrate the APRMs. There is no active interface between the process computer and other plant systems. The process computer and its associated software are non-safety related. Miscalibration of the APRMs is not a precursor to any accident or malfunction described in the USAR. This change specifies that the suction minus recirc flow indication may only be used when it indicates higher than the main feed flow venturis. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The use of this indication will affect the calibration of the APRM system only. The only possible negative consequence of this action would be miscalibration of the APRMs. Given that the feed pump suction minus recirc flows are within the required accuracy, miscalibration will not occur solely as a result of implementation of this activity. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. It has previously been determined that a feedwater flow measurement uncertainty of 1.7% will have a negligible (although non-conservative) impact on the Safety Limit Minimum Critical Power Ratio. The main feed pump suction minus recirc flow uncertainty is less than 1.7%, and this indication is only allowed to be used when it is higher than the indicated main feedwater venturi flow. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-036

Source Document: DCP 93-010, Rev. 0

Description of Change

This design change installs the I&C hardware necessary to support the addition of three Process Computer Point inputs associated with feedwater flow parameters.

Summary

- I. No. This design change terminates existing wiring between cabinets to obtain desired feedwater flow computer point inputs. The proposed terminations will have no impact on the feedwater control loops in performing their required function as described in USAR Section 7.7.1.4 nor will they impact current USAR Chapter 15 analysis associated with feedwater flow. The proposed circuit addition will also have no impact on current USAR analysis in Sections 7.7.1.3 and 7.7.1.8 associated with the Recirc Flow Control System and Process Computer System, respectively (with exception to the required USAR P&ID changes). Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The inputs are connected in a manner that will not affect the operation of the existing Recirculation Flow Control System nor the Feedwater Control System. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated
- III. No. Process Computer point wiring has no impact on any Technical Specification basis or margin of Safety described therein. The installation also has no impact on the proper functions of the Feedwater Control System. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-037

Source Document: SOI-B33, Rev. 4, TC-4

Description of Change

This change to System Operating Instruction (SOI)-B33, "Reactor Recirculation System", describes actions to take if the feedwater flow venturis are providing an erroneous interlock preventing the upshift to faster speed recirculation pump operation. This revision will allow use of the appropriate bypass switches when NPSH requirements have been verified.

Summary

- I. No. The bypass switches will only be used to bypass the low pump water flow cavitation interlock for the reactor recirculation pump upshift after the feedwater flow venturi signal has been proven to be falsely below the interlock setpoint and when NPSH requirements are met. The primary low speed pump operation cavitation interlock (L3) is not affected by this change, nor is the primary fast speed pump operation cavitation downshift interlock (dome to loop less than 8 degrees F indicating inadequate subcooling from feedwater). Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The administratively controlled use of these bypass switches cannot create any type of malfunction of equipment important to safety that has been previously evaluated in the USAR. The manner in which the system is operated is unchanged. Cavitation prevention is maintained. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This is an administrative change. The regions and borders described for power vs. flow operation are unchanged. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-038

Source Document: MFI/LLJED 1-93-011

Description of Change

This Mechanical Foreign Item (MFI) provides for inserting a blind flange in place of an existing spectacle flange (1E12D0502A) to allow operation of 1E12C001A while replacing valve 1E12F0024A.

Summary

- I. No. The installation of the blind plate flange will prevent flow back to the suppression pool. In this condition, the suppression pool cooling and full flow test return mode become unavailable. In addition, the shutdown cooling or Alternate Shutdown Cooling modes described in USAR 5.7.4.1.5 also becomes inoperable. However, since the plant will be in Modes 4 and 5 during the 1E12F0024A replacement there is no need for these modes of RHR to be available. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The blank flange being installed will be designed in accordance with the applicable requirements of the ASME code. The blank will remain in place until 1E12F0024A has been replaced and hydrostatically vented. Throughout the valve replacement, 1E12C002A will be in service to provide alternate shutdown cooling. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. There are no changes to the Technical Specification or the Operating License because the system will not be considered operable during the time this MFI is installed. The RHR A will however be available for alternate decay heat removal. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-039

Source Document: MFI/LLJED 1-93-012

Description of Change

This Lifted Lead & Jumper will install a jumper to defeat the interlock between 1E12F024A and F006A to allow the use of RHR A as a source of alternate decay heat removal during the replacement of valve 1E12F024A.

Summary

- I. No. The interlock to be jumpered prevents 1E12F024A and F006A from being opened simultaneously to prevent draining the reactor. During the period that this LLJED will be in effect, the piping upstream of 1E12F024A will be blanked off, thus preventing draining of the reactor via this valve. Therefore, during this period, the interlock is not needed, and neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The LL&J will not affect any other function or interlock associated with 1E12F006A. The LL&J will be installed in a junction box and will not affect any other system or component. The possibility of draining the reactor through 1E12F0024A/1E12F006A will not be a problem with the blank installed. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The LLJED will allow the use of the inoperable but available RHR A system as a source of alternate decay heat removal. This operating enhancement will give added flexibility and reliability to the operable decay heat removal system, thereby increasing the margin of safety. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-040

Source Document: DCP 92-009, Rev. 0
NR 90-S-257, Rev. 1
NR 90-S-264, Rev. 1

Description of Change

This design change replaces the springs in five Emergency Service Water (ESW) relief valves to change the backpressure characteristics.

Summary

- I. No. These modification are consistent with the requirement of the ASME Boiler and Pressure Vessel Code and do not alter the existing Safety Evaluation as stated in USAR 9.2.1.3. The performance and availability of the ESW system is not being degraded by these changes. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This change does not alter the functioning or operating characteristics of the ESW System. The new relief valves will still open at 150 psig during operation of the ESW System. A break in these lines is still bounded by the larger size pipe break analysis for the Control Complex and the Diesel-Generator Buildings. ESW remains available as designed in accordance with the USAR and ASME code and reliability is increased. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The use of the new relief valves does not alter any existing Technical Specifications nor adversely affect any other equipment. This change does not alter the operation, functions or design of the ESW System in any way. ESW reliability is increased. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-041

Source Document: TXI-0155, Rev. 0

Description of Change

This Temporary Instruction (TXI)-0155, "RHR Alternate Suppression Pool Cooling" provides an alternate flow path for RHR suppression pool cooling in which the RHR pump takes a suction through 1E12F004A(B) and returns to the suppression via 1E12F011A(B). This instruction maintains the minimum flow valves in the open position.

Summary

- I. No. The only accident analyzed in the USAR which evaluates RHR as a potential initiator is the inadvertent initiation of shutdown cooling. Operation in this mode effectively prevents this accident from occurring. With 1E12F003A(B) and F048A(B) closed, there is no way to establish a return flow path to the RPV. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. Adequate minimum flow is assured by deenergizing the minimum flow valve in the open position. The flow path is identical to the path used when flushing RHR loops with suppression pool water in preparation for shutdown cooling. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This change requires declaring the associated RHR system inoperable and taking the required Technical Specification actions for an inoperable RHR loop. It also requires declaring Containment Integrity Inoperable and taking the required outcome for a loss of Containment Integrity. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-042

Source Document: USAR CR 93-011
FTI-B0010, Rev. 0, TC-1

Description of Change

Superseded by SE 93-052.

SE No.: 93-043

Source Document: PAP-1916, Rev. 4, TC-2

Description of Change

This change to Plant Administrative Procedure (PAP)-1916, "Duties of the Fire Watch" the Fire Protection Program allows impairment compensating actions to be assigned to the individual work groups to improve the utilization of manpower when minor fire door impairment are required along with other administrative changes.

Summary

- I. No. The administrative changes are consistent with NRC and NFPA guidelines. They do not alter any system or component. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The changes are administrative and do not adversely affect any system, structure or component. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. These changes do not impact any activity described in Technical Specifications. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-044

Source Document: DCN 3662, Rev. 0

Description of Change

This drawing change deletes reference of the MSIV isolation valves in the "Valves Closed" portion of Table III shown on P&ID D-302-964, Leak Detection System, for temperature switches 1E31N351A-D. The isolation function of these leak detection (E31) system switches was deleted via DCP 88-298. Reference SE 89-110.

Summary

- I. No. This is an editorial change to a USAR drawing. The E31 Leak Detection System design basis and field configuration are not affected by this DCN. Neither the probability of occurrence nor the consequences of a previously analyzed accident are increased by this change.
- II. No. This DCN does not affect the hardware on the operation of the E31 system. Therefore, the possibility for an accident or malfunction of a different type than any previously evaluated in the USAR is not created.
- III. No. This editorial DCN does not change any Technical Specification design as operability requirements, nor does it affect the licensing bases. Therefore, this change does not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-045

Source Document: DCP 87-524Q, Rev. 0

Description of Change

This design change removes the Feedwater Zinc Injection (P85) system analyzer, associated equipment, and sections of the existing sample lines. The existing RWCU (G33) and NCC (P43) piping which provide the sample and cooling water are being capped.

Summary

I. No. Although continuous reactor coolant zinc analysis is desirable, intermittent grab sampling and analysis is an acceptable alternative. The operation of the zinc injection skid provides a relatively constant zinc concentration within the feedwater and reactor coolant. Because of this, grab sampling and analysis is adequate to maintain the zinc concentration within specified limits.

The P43 & G33 vent and drain valves which were previously used will now be closed and the end of the piping capped. This work will be performed in accordance with ASME and ANSI B31.1 requirements applicable to the original line spec requirements.

The P85 reactor coolant analyzer is not required for safe shutdown of the reactor. Removal of this equipment has no adverse radiological affects, and has no impact on off-site dose/releases. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.

II. No. The removal of the P85 reactor coolant zinc analyzer and capping of the P43 and G33 piping will be done in accordance with the original industry standards which are applicable to each system's piping. The reactor coolant zinc analyzer is non-safety, and the P85, G33 and P43 systems are not important to safety and are not required for safe shutdown of the plant. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.

III. No. The P85 reactor coolant analyzer is not addressed by Technical Specifications nor are the Technical Specification Reactor Water Chemistry limits affected by removal of this equipment. In addition, the Technical Specification licensing bases parameters are not affected by the removal of the analyzer and capping of the P43 and G33 piping. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-046

Source Document: MFI/LLJED 1-93-013

Description of Change

This Mechanical Foreign Item will allow the installation of 50 feet of 1/2" stainless steel tubing at the sample point in the feedwater system to support chemical traces testing. This line will be connected and supported properly and pressure tested prior to use.

Summary

- I. No. The vent valve isolating the tubing from the non-safety feedwater system will remain Normally Closed. Additionally, the feedwater line break outside of containment analysis bounds any potential break of this line. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. There is no equipment important to safety in the vicinity of the tubing run. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The connection of this 1/2" tubing to a vent line in the non-safety feedwater system will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-047

Source Document: DCP 89-056, Rev. 2

Description of Change

This design change improves maneuverability of the solid radwaste disposal system crane, (S.R.D) under both loaded and non-loaded conditions. The crane limit switch trippers were originally set to move only 55 gallon drums. This change will allow movement of liners which are 180 cu. ft. and 72 in. diameter. The new design will allow operators to control the view (cameras) with one hand and the crane travel with the other without mechanical interlock. It will also permit a hoist fast speed in the process pit to minimize radiation exposure to operating personnel. The extent of this Safety Evaluation is to consider the operation of the S.R.D. crane not its rated capacity which has been previously evaluated.

Summary

- I. No. The solid radwaste disposal system crane function and performance remain essentially as originally designed. The only exception to the description in USAR Section 11.4 is that the override switch will allow slow speed movement of the crane when the hoist is not fully up. This was previously accomplished by jogging the switch, and thus the load. Additionally, the operator now has full view of all crane movements via closed circuit TV to allow better control. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. Crane control and operation are enhanced by these changes, not degraded. Circuit reliability remains unchanged while inspection, testing and maintenance of the system are improved. The function, operation and reliability of the system remain eventually unchanged. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The reliability of the system remains unchanged by these changes. The proposed activities do not change the control or operation of the crane as previously evaluated nor does it change the way the liners are handled. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-048

Source Document: TXI-0157, Rev. 0

Description of Change

This Temporary Instruction (TXI)-0157, "RHR Shutdown Cooling Using Throttled ESW Flow", analyzes operation of the Emergency Service Water (P45) and Residual Heat Removal (E12) systems in a modified shutdown cooling mode in which the RHR Heat Exchanger Bypass Valve, 1E12-F048A(B), is closed and the cooldown rate is controlled by throttling ESW flow through the RHR heat exchangers.

Summary

- I. No. Operation in this mode will result in lower Emergency Closed Cooling (ECC) temperatures and increased flow to certain ECC supported systems. No changes to the RHR system flow rate will be made. The only accident analyzed in Chapter 15 of the USAR with RHR as a potential initiator is the inadvertent initiation of shutdown cooling. The initiator of this accident is dependent on operator error, the probability of which is not affected by this change. The ECC loads have been analyzed for the Operational Conditions during which this change applies and compensatory actions have been incorporated into procedures to ensure system reliability. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The only equipment of concern affected by this change are the Control Complex Chilled Water (P47) chillers. If the ECC cooling water supply is too cold, the chillers may trip. This change requires the Control Room HVAC (M25/26) subsystem associated with the "at risk" P47 chiller to be declared inoperable, thus ensuring that compensatory actions per Technical Specifications are taken in advance of any protected problem. No potential exists for either the P47 system or the M25/26 system to initiate a transient or an accident in Operational Conditions 4 or 5 during which this change applies. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This instruction requires declaring the associated RHR and M25/26 subsystems inoperable and taking the required Technical Specification actions for the inoperable equipment. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-049

Source Document: DCP 93-020, Rev. 0

Description of Change

This design change replaces restricting orifices (MPL 1E12D003A/B) with restricting orifices which have a provision for air testing the sealing surfaces of the flange/orifice to verify that the joint is leak-tight:

Summary

- I. No. This design change meets ASME III, subsection NC design requirements. The replacement restricting orifice will be of the same size (6.21 inch I.D.) as the original orifice and will have no detrimental affect upon the flow characteristics through this line. The gasket material conforms with ISS-2000 line specification. As documented in the Design Interface Summary, this modification will have no impact upon the piping analysis or the seismic supports associated with this piping and the design remains in compliance with GE system design specifications. The design of the testable orifice plate will permit type B testing consistent with the requirements of 10CFR50 Appendix J. Finally, the RHR system test return line penetrations are not associated with any accident initiators described in the USAR. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The proposed design change meets all original design criteria. It has no negative impact upon containment integrity or RHR system function. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This design change ensures the maintenance of containment integrity under post-LOCA conditions and maintains the RHR system design standards. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-050

Source Document: NR 93-N-059, Rev. 0

Description of Change

This nonconformance report provides the "Temporary Use-As-Is" and "Repair Use-As-Is" dispositions for a through wall pin hole leak on Auxiliary Steam and Drain (P61) system valve 1P61F0583. Per USAR Section 9.5.10 the valve was designed in accordance with the standard set forth in ASME/ANSI B31.1. The pin hole leak violates the pressure boundary of the valve and consequently it is no longer in compliance with ANSI/ASME B31.1. Therefore, the valve is no longer in compliance with the USAR and this results in an implied change to the plant as described in the USAR. The purpose of this Safety Evaluation is to evaluate the implied change to the plant as a result of this Temporary Use-As-Is and Repair with Use-As-Is dispositions.

Summary

- I. No. The pin hole leak has been inspected and found to be acceptable for Temporary Use-As-Is. In the unlikely event that the valve fails, there will be no increase in the probability of an accident previously analyzed in the USAR. The Aux. Boiler System and the components it supplies are non-safety related and are not required for the safe shutdown of the plant. There are no correlations between the performance of the Aux. Boiler system and any of the accidents previously evaluated in the USAR. Additionally, the Aux. Boiler and valve 1P61F0583 are located outside of the RRA in a non-safety building that contains no safety related equipment. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This equipment does not interact with any equipment important to safety or safety related. Therefore, this proposed activity will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. Although heavy reliance is placed on the P61 system to supply the Building Heating (P55) system with steam for freeze protection, neither the P61 nor the P55 systems are included in the bases of the Technical Specifications. Therefore, the proposed activity will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-051
Source Document: PAP-1917, Rev. 3, TC-2

Description of Change

This change to Plant Administrative Procedure (PAP)-1917, "Fire Protection Training Program" modifies the definition of "Annual Basis" to allow flexibility in the training schedule. It allows up to a thirteen month training frequency, not to be used routinely, to alleviate problems created by the realignment of working shifts within the Site Protection Section. This change also corrects a discrepancy between course content and description and it modifies the training requirements for a work group serving as a firewatch when minor fire door impairments are required.

Summary

- I. No. The changes made in this procedure are consistent with all existing licensing requirements. They do not alter any system or component nor do they change any plant activity which could affect system operation. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. These changes have no effect on system function or operation. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. Technical Specifications contain only the administrative aspects of the Fire Protection Program, including review and audit responsibilities, the need for administrative procedures and reporting requirements. Additionally, the training frequency change being made is consistent with Section 4.0.2 of the Technical Specification. The changes being made to PAP-1917 do not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-052

Source Document: USAR CR 93-011

FTI-B0010, Rev. 0, TC-1

Description of Change

This evaluation analyzes the update of USAR Appendix 15B, "Reload Safety Analysis," and the Plant Data Book Section F (PDB-F0001), "Core Operating Limits Report," and the Fuel and Core Analysis Instruction (FTI-B0010), "Preparation for Final Feedwater Temperature Reduction." The update is necessary because of the change in the fuel loading configuration made during the Cycle 4 mid-cycle outage.

Summary

I. No. The only change to the plant is in the introduction of a new fuel configuration and core design. No other plant system or component is altered. Since all the accidents involving fuel are initiated by other systems, no change to accident initiators is proposed.

The fundamental sequences of accidents and transients have also not been altered. Potentially limiting plant transients and accidents have been analyzed and evaluated using the same limits on consequences as have been used previously in the USAR, and as approved in the NRC Safety Evaluation for GESTAR II. The General Electric document 23A7147, Rev. 2, "Supplemental Reload Licensing Report for PNPP Unit 1 Reload 3 Cycle 4" documents the results of the GESTAR II analysis for the remainder of Cycle 4. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.

II. No. Plant operation which conforms to the analyzed envelope of the USAR Chapters 4, 5, and 15, and with the Core Operating Limits Report revision, will allow conformance with the GESTAR II analysis. The GESTAR II analysis has been accepted by the NRC as comprehensive for ensuring that fuel designs will perform within acceptable bounds. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.

III. No. The new fuel configuration does not alter the design or function of any plant system, outside of the fuel. The fuel design was produced using NRC-approved methods described in GESTAR II. The design satisfies the acceptance criteria which are consistent with the MCPR Safety Limit, and the bases of the other fuel-related Technical Specifications (MAPLHGR, LHGR, Shutdown Margin). Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-053

Source Document: Emergency Plan, Rev. 11, TC-1

Description of Change

This change to the Emergency Plan involves assignment and availability of back-up communicator support during the initial phase of an event.

Summary

- I. No. This change does not reduce the NUREG-0654 requirement for on-shift notifications/communications support, nor does it alter the commitment as outlined in Table 5-1 of the Emergency Plan. Rather, this change merely clarifies the availability of back-up communicator support during the initial phase of an event. Based on this review, the change has been evaluated as not decreasing the effectiveness of the Plan per 10CFR50.54(q) and continues to meet the requirements of 10CFR50.54(b) and Appendix E. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. See Item I above.
- III. No. This change is administrative and does not affect the operation of plant systems, components, or structures. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-054

Source Document: NR 93-S-066, Rev. 0

Description of Change

This nonconformance report provides for the "Interim Use-As-Is" disposition regarding operability of the pilot air header position of the Control Rod Drive (C11) system hydraulic control units (HCU) with mixed tube fittings.

Summary

- I. No. The nonconforming condition involves the mixing of tube fittings from different manufacturers. These mixed tube fittings are comparable in strength to the proper fittings and are present in the pilot air header which is a fail-safe position of the system. A gross tube failure is bounded by the loss of instrument air analysis and would result in a reactor scram. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. Initial testing and plant operation to date has shown the integrity of the tube fitting connections to be maintained and acceptable for interim operation in their present configuration. Gross failure of any of the tube fitting joints is considered to be highly unlikely. The Parker and Swagelok fittings presently installed are relatively similar in design strength and assembly configuration, thus giving reasonable assurance against this type of malfunction. Gross failure in this case is bounded by the loss of instrument air accident analysis (Chapter 15) and would result in a reactor scram. Therefore, this condition will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This condition is limited to the fail-safe portion of the HCUs. In the highly improbable event that gross tube joint failure occurs, a reactor scram would result thus maintaining Technical Specification margins of safety. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-055
Source Document: PTI-E12-P0003, Rev. 1

Description of Change

This change to Periodic Test Instruction (PTI)-E12-P0003, "RHR Heat Exchangers B and D Performance Testing", involves the replacement of installed temperature indication with more accurate instrumentation to support data collection on the B and D Residual Heat Removal (RHR) (E12) heat exchangers.

Summary

I. No. This activity collects data to enable an analysis to be performed on the capacity of the RHR B & D Heat Exchangers. The system is functional with all of the designed safety interlocks still active during the data collection process. The four temperature elements used in recording the inlet and outlet temperatures of the RHR and the ESW system are the only plant equipment affected by the implementation of this instruction. These temperature elements are replaced by more accurate temperature measuring devices known as RTD's, (Resistance Thermal Devices), and are placed within each of the existing pipe thermalwells. Temperature indication, during data collection, for these points are no longer transferred to the recorder on the 1H13-P601 panel in the control room. The instruction identifies that these temperature elements are not available for control room observation by the illumination of three control room annunciators as annotated in the instruction. However, the temperature indication is available through the test equipment used within this instruction during the data collection period. During the collection of the data necessary for the heat exchanger evaluation the individual temperatures may be obtained from the responsible test personnel.

The operation of plant equipment, or maintenance activities will not be affected by the use of this instruction. The systems used for this instruction will be placed in operation by the use and/or performance of pre-approved instructions, primarily by the applicable System Operating Instruction(s) [SOI(s)]. The parameters established will be maintained within the design basis criteria established in Section 5.4.7 of the USAR for the Shutdown Cooling and Suppression Pool Cooling Modes of the RHR System, and Section 9.2.1 of the USAR for the Emergency Service Water System. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.

II. No. The activity associated with the performance of this instruction is the collection of data for the evaluation of the RHR B & D Heat Exchangers. All of the methods implemented during this data collection are consistent with the operational methods use for system operations in accordance with design requirements within USAR Sections 5.4.7.1.1.1, 5.4.7.2.2.b, and 5.4.7.2.6.a. Therefore, this instruction will not create the possibility for an accident or malfunction of a different type than any previously analyzed.

SE No.: 93-055 (Cont.)

Summary (Cont.)

III. No. The RHR system is functional with all of the designed safety interlocks still active during the data collection process. Therefore, this instruction will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-056

Source Document: PTI-E12-P0002, Rev. 1

Description of Change

This change to Periodic Test Instruction (PTI)-E12-P0002, "RHR Heat Exchanger A and C Performance Testing", involves the replacement of installed temperature indication with more accurate instrumentation to support data collection on the A and C Residual Heat Removal (RHR) (E12) heat exchangers.

Summary

I. No. This activity collects data to enable an analysis to be performed on the capacity of the RHR A & C Heat Exchangers. The system is functional with all of the designed safety interlocks still active during the data collection process. The four temperature elements used in recording the inlet and outlet temperatures of the RHR and the ESW system are the only plant equipment affected by the implementation of this instruction. These temperature elements are replaced by more accurate temperature measuring devices known as RTD's, (Resistance Thermal Devices), and are placed within each of the existing pipe thermalwells. Temperature indication, during data collection, for these points are no longer transferred to the recorder on the 1H13-P601 panel in the control room. The instruction identifies that these temperature elements are not available for control room observation by the illumination of three control room annunciators as annotated in the instruction. However, the temperature indication is available through the test equipment used within this instruction during the data collection period. During the collection of the data necessary for the heat exchanger evaluation the individual temperatures may be obtained from the responsible test personnel.

The operation of plant equipment, or maintenance activities will not be affected by the use of this instruction. The systems used for this instruction will be placed in operation by the use and/or performance of pre-approved instructions, primarily by the applicable System Operating Instruction(s) [SOI(s)]. The parameters established will be maintained within the design basis criteria established in Section 5.4.7 of the USAR for the Shutdown Cooling and Suppression Pool Cooling Modes of the RHR System, and Section 9.2.1 of the USAR for the Emergency Service Water System. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.

II. No. The activity associated with the performance of this instruction is the collection of data for the evaluation of the RHR A & C Heat Exchangers. All of the methods implemented during this data collection are consistent with the operational methods use for system operations in accordance with design requirements within USAR Sections 5.4.7.1.1, 5.4.7.2.2.b, and 5.4.7.2.6.a. Therefore, this instruction will not create the possibility for an accident or malfunction of a different type than any previously analyzed.

SE No.: 93-056 (Cont.)

Summary (Cont.)

III. No. The RHR system is functional with all of the designed safety interlocks still active during the data collection process. Therefore, this instruction will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-057

Source Document: USAR CR 93-009

Description of Change

This change specifies the submergence requirements for spent control rod blades during both transit and storage. The USAR currently addresses only spent control rods in underwater storage.

Summary

- I. No. The proposed change will allow for spent control rod blades to be lifted above the interpreted minimum "storage" submergence requirement of 6 feet - 7 inches during transit without having provisions in place to administer minimum "storage" shielding requirements. Once seated upon the hanger, the control rod blade will be maintained with a minimum of 6 feet - 7 inches shielding of water as previously stated in the USAR. The change, which allows for the raising of the control rod blade, does not affect any accident postulations as previously evaluated nor will it initiate any accident. As a result of this change, spent control rod blades will be lifted as necessary to place them onto the hangers. The lifting of the spent control rod blade will not create an accident of a different type than any previously evaluated in the USAR. A condition of a spent control rod drop under the additional height increase would still be enveloped under the worst case load drop. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this USAR change.
- II. No. This change defines the submergence requirements for spent control rods blades during transit and during storage. Activities associated will not affect equipment important to safety. Therefore, this activity will not create the possibility for an accident or malfunction of a different type than any previously analyzed.
- III. No. As a result of this proposed change, a reduction in water shielding by a maximum of four inches will occur to allow the control rod blade to be lifted onto the storage hanger. This reduction in shielding will result in a submergence of no less than 6 feet - 3 inches of water during transit activities. A comparison of this submergence with that of calculation REE-92-004 "Assess Impact of Lower Fuel Pool Water Level," which estimates the maximum drop in water level, shows that the 6 foot - 3 inch submergence as required for the transit of a control rod blade onto a hanger will be bounded by the results which show that decreasing the shielding of water above the control rod to 6 feet - 1 inch will still be within the USAR Chapter 12 Figure 12.3-3 limits which are not to exceed the Zone III limit of 25 mR/hr. Furthermore, fuel handling accident

SE No.: 93-057 (Cont.)

Summary (Cont.)

consequence bound the consequences of potential drop of control rod blade from a 4" higher elevation. Based on the fact that the dose limit at the operating floor will not be exceeded and that the proposed change any associated activities will not affect equipment important to safety or result in an accident which already has been analyzed for the proposed activity of adding this change to the USAR and the direct result of lifting a spent control rod blade onto the hanger will not reduce the margin of safety as defined in the bases for any technical specifications.

SE No.: 93-058

Source Document: DCN 3704, Rev. 0

Description of Change

This drawing change corrects MPL numbers on P&IDs D-352-621, Emergency Closed Cooling System (Unit 2), and D-302-243, Instrument Air (Unit 1).

Summary

- I. No. The revision of P&IDs to correct MPL numbering will not affect plant operation in any way. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. See Item I above.
- III. No. This DCN does not change or affect any information contained in the Technical Specification, nor does it affect the operation of any system. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-059

Source Document: MFI/LLJED 1-93-29

Description of Change

This MFI/LLJED connects equivalent temperature sensors in Reactor Steam Domes A and B to the control logic for the Reactor Recirculation Pumps in order to restore the Thermal Shock and the 8 Degree Delta Temperature Interlocks to operation.

Summary

- I. No. The thermocouple and RTDs being used are identical to the ones originally providing these interlocks. Jumpers and connections are of like materials to those already present in the circuits. Chapter 15 of the USAR and the Technical Specifications assume that the interlocks are administratively enforced. There is no Chapter 15 analysis or Technical Specification basis which relies on this interlock. Thus, automatic actuation is an added benefit. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The Reactor Recirculation Pump control logic is described in USAR Section 7.7.1.3 under "Control Systems not Required for Safety." With the interlocks restored to operation the Reactor Recirculation System will be protected from events already described in the USAR. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. Technical Specifications assume that the Thermal Shock Interlocks are administratively enforced during recirculation pump starts and they make no assumption regarding the 8 Degree Delta Temperature interlock. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-060

Source Document: DCP 89-216, Rev. 0

Description of Change

This design change is considered to be Phase I of a 3 phase program to upgrade the Perry Plant Computers. This first phase will upgrade the Monicore VAX 11/780 Digital Equipment Computer (DEC) to a 3D Monicore (3DMS) VAX 7000 DEC computer. The new system will be installed and operated in parallel with the original equipment for a period of time to ensure successful operation of the new equipment.

Summary

- I. No. The new 3DMS has state-of-the-art hardware and enhanced software which does not alter the operation and reliability of the core performance requirements needed to support plant operation. Therefore, the original design intent has not been compromised. The 3DMS will operate in parallel with the Monicore and Process Computers until the new 3DMS is satisfactorily tested and accepted by Reactor Engineering. If for any reason the 3DMS cannot meet all design and operational requirements, the existing Monicore and Process computer as before, will be used. The evaluated events described in Section 15.0 are not impacted by the parallel operation of the new 3DMS. The 3DMS is non-safety related and has no active interface with safety related systems. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. Parallel operation of this computer will not affect plant operation. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The values obtained in parallel by the 3DMS will be compared with the value from the original Monicore VAX 11/780 prior to use. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-061

Source Document: DCP 91-064, Rev. 0

Description of Change

This design change replaces the Solon differential pressure switches associated with the Annulus Exhaust Gas Treatment (M15) System (AEGTS) fans with Fluid Components Inc. (FCI) thermal dispersion type flow switches.

Summary

I. No. The flow switch is a fully qualified component capable of performing its intended function in a nuclear environment. There are no moving parts. Actual flow is detected and measured based on a thermal dispersion technique. Set point drift experienced by the existing differential pressure switches has been eliminated thus increasing the reliability of AEGTS.

Failure of the flow switch itself or loss of power will automatically provide the fan transfer function to the standby system. This assures maintenance of the negative differential pressure in the annulus at all times. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.

II. No. The flow switch is a fully qualified component capable of performing its intended function in a nuclear environment. The purpose of the switch is to provide the fan transfer function to the standby system. Failure of the flow switch itself or loss of power will automatically provide this transfer. There are NO other interlocks associated with this switch. Therefore, this design change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.

III. No. This design change does not deviate from any design basis. Accident analyses as described in the USAR are not affected. Operational requirements are unchanged. Therefore, there is no reduction in the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-062

Source Document: CHIA-54, Rev. 1

Description of Change

This change to Chemistry Analytical Instruction (CHIA)-54, "Radiological Effluent Data Reduction", allows planned liquid radwaste discharges to be made during periods when the excess service water flow rate is less than the currently specified minimum dilution flow rate of 30,000 gpm. This will be accomplished by varying the tank discharge rate accordingly.

Summary

- I. No. The proposed change does not involve accidental releases as described in the USAR safety analyses, but rather deals only with planned, cognizant releases. Variability in the dilution flow rate is a normal occurrence. This change has no affect on the operability or availability of equipment important to safety. It simply alters the method by which proper dilution flow is obtained. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This change does not impact the operability or availability of equipment important to safety. Therefore, it will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The proposed change does not alter any liquid radwaste discharge limits specified in the Technical Specifications, or does it allow for the release of liquid radioactive waste above specified limits. Therefore, it will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-063

Source Document: MFI/LLJED 1-93-031

Description of Change

This Mechanical Foreign Item removes the internals of check valves OG50F663 and OG50F664 to allow use of the Chemical Waste Distillate Tanks (CWDT) for storing water. Water from the radwaste filters will be sent to the CWDT for temporary storage. From the CWDT, it will be processed through the radwaste demineralizers to the sample tanks in accordance with approved procedures.

Summary

I. No. Removal of the check valve internals does not change the design basis of the piping system. The CWDT is designed to contain radioactive liquid. The piping configuration is consistent with the other lines that tie into the radwaste demineralizers. The CWDT line to the discharge station is controlled by a locked valve so there is no increase in the probability of an inadvertent discharge. The locked valve is administratively controlled to prevent discharges except as allowed by Technical Specifications.

The analyzed accident pertaining to this change is the rupture of a radwaste storage tank resulting in a liquid release. The CWDTs are approximately 15,000 gallons smaller than a waste collector or floor drain collector tanks. The radioactive contents of the CWDTs will be filtered waste collector or floor drain collector tank water thus will be lower in activity. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.

II. No. The modified system will meet the original design basis and the configuration without a check valve is consistent with other radwaste branches off the same pipe. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.

III. No. Liquid radwaste will continue to be treated and discharged in accordance with the requirements of Technical Specifications and therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-064

Source Document: MFI/LLJED 1-93-032

Description of Change

This Mechanical Foreign Item supplies temporary keep fill capability to Emergency Service Water (P45) Loops A, B and C while the Service Water (P41) system is isolated from ESW. The temporary source of water is from the Fire Protection (P54) system via a hose connection to the non-safety related piping side of the Class 3 boundary check valves.

Summary

- I. No. The temporary keep fill system will operate essentially the same as the originally installed system. It will tie into non-safety piping side of the Class 3 boundary check valves. In the event of a hose rupture, the Class 3 check valves are designed to prevent ESW backflow. The hose and connection are designed for P54 system pressure. This change has no impact on any of the fixed fire suppression systems in the plant. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The ESW keep fill system will continue to operate normally to prevent air pockets from forming that could cause water hammer. The fixed fire suppression system operability will remain within established margins of safety. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This MFI will not affect the overall operation of the ESW system on the Fire Suppression system. The capability of both will remain within design limits. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-065

Source Document: MFI/LLJED 1-93-033

Description of Change

This Mechanical Foreign Item provides a temporary source of backup air to the service and instrument air system during maintenance on the service water system. The temporary compressor will only be used if the installed service and instrument air compressors cannot maintain adequate system pressure.

Summary

- I. No. The connection of the temporary compressor will be through the normal Integrated Leak Rate Test connection and the air will be fed into the service air system, through its receiver tank to the instrument air receiver tank and on through the filters and dryers to the process piping. Air quality and pressure at this point will be the same as that supplied by normally installed systems. All materials and connections will be in accordance with plant approved specifications. The complete loss of instrument air accident bounds a rupture in this temporary connection. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The instrument air pressure and quality will be maintained within normal limits. Loss of the temporary air source is bounded by the complete loss of instrument air accident analysis. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously analyzed.
- III. No. The service and instrument air systems are not addressed in Technical Specifications. Instrument air pressure and quality will be maintained within normal limits. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-066

Source Document: MFI 1-93-034

Description of Change

This Mechanical Foreign Item provides an alternate source of cooling from the Fire Suppression System (F54) to the Instrument Air Compressor during the period that maintenance is being performed on the Service Water System. This MFI will provide an effective alternate cooling water source in the event of a loss of Nuclear Closed Cooling (NCC).

Summary

- I. No. This MFI will permit the continued operation of the Instrument Air compressor in the event of a loss of NCC to the compressor. The loss of Instrument Air is evaluated in the USAR and this MFI falls within the bounds of that evaluation. The use of the Fire Suppression system for backup cooling is within the excess capacity of that system and will not adversely impact the operation of that system. Connections and materials will be made in accordance with plant approved specification. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. All equipment and materials are rated for the pressures to which they will be subjected. This installation will minimize the possibility of a loss of Instrument Air. The Loss of Instrument Air, Fire and Flooding accidents are already analyzed in the USAR and they bound any situation which could result from a failure of this equipment. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This change enhances the operability of the Instrument Air System and it does not adversely affect the Fire Suppression System. It will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-067

Source Document: MFI 1-93-035

Description of Change

This Mechanical Foreign Item will supply an alternate source of cooling water to the Condensate (N21) Hotwell pump motor lube oil coolers. Fire Suppression (P54) system water will be routed through a portion of Turbine Building Closed Cooling (P44) (TBCC) system to the lube oil coolers to allow pump operation for Hotwell level/water management purposes. P54 will supply 8 to 25 gpm of cooling water flow to the Hotwell pumps.

Summary

- I. No. This MFI provides for temporary cooling water from P54 to the Hotwell pump motor lube oil coolers in order to permit operation of the hotwell pumps for the purposes of hotwell level control and water management. This MFI will not be utilized to support power operations nor is it required to support equipment important to safety in the present plant condition. This MFI does not increase the potential for flooding in the areas associated, as no new water source is involved and the equipment utilized is rated for the pressures concerned. The consequences of a fire are unchanged with this temporary modification as the MFI has no impact on any fixed suppression systems. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The MFI is to be installed on non-safety equipment, with the plant in a shutdown condition. This equipment will not be utilized to support the plant in power modes of operation nor will it impact equipment important to safety in the current plant condition either due to proximity or application. The capabilities of the P54 system remain unchanged. Therefore, this MFI does not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The proposed usage of the P54 system is within the margin of safety for fire suppression capability. Neither the Condensate nor the TBCC systems are described in Technical Specification. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-068

Source Document: MFI 1-93-036

Description of Change

This Mechanical Foreign Item adds a heat exchanger cooled by the Fire Suppression (P54) system to the Turbine Building Closed Cooling (TBCC) system during the period that the Service Water (P41) system is not available.

Summary

- I. No. The heat exchanger has been tested in accordance with the ASME code. The capabilities of the P54 system remain within acceptable limits. All materials and component are properly rated. The additional water source in the Turbine building is negligible in comparison with the flooding analysis assumptions. The TBCC system is non-safety related and is not required for safe shutdown. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The TBCC system is non-safety related and does not supply any safety related equipment. The affect on the P54 system has been evaluated and found to be acceptable. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The Turbine Building Closed Cooling system is not discussed in the Technical Specifications. Technical Specification 3.11.2.4 requires the offgas system (a TBCC load) to be in operation only when the air ejector evacuation system is in operation and this modification will be removed prior to start-up. The P54 water usage has been found to be well within the safety margins. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-069

Source Document: DCN 4163, Rev. 0

Description of Change

This drawing change revises drawings D-302-110, Condensate Demineralizer System, and SS-304-107-181, Condensate Demineralized System - Turbine Power Complex, to show orifice flanges, a ring spacer and the associated root valves in the Condensate Demineralizer (N24) system that have been abandoned in place following removal of an orifice plate and flow meter by an earlier DCP.

Summary

- I. No. The components remaining in place are installed in accordance with ANSI B31.1. No new failure mechanisms are introduced by leaving these items installed. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The items abandoned in place do not affect the safe operation or shutdown of the plant. They meet plant design basis requirements and their failure would have no impact upon equipment required for safe shutdown. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. System operability has not been adversely affected by these components remaining in place. This change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-070

Source Document: USAR CR 93-027

Description of Change

This change updates the USAR to identify the Diesel Fuel Storage Tank Maintenance Structure Missile protection barriers.

Summary

- I. No. The missile shields already exist. The USAR is being updated to reflect their location. No changes to systems, structures or components are being made, nor are any changes to system operation being made. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This change simply updates the USAR to reflect existing missile protection structures which meet the appropriate design criteria. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. There are no changes to systems, structures or components nor are there any changes to any operating parameters or procedures. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-071

Source Document: DCP 93-045, Rev. 0

Description of Change

This design change adds a 2" drain line and valve to the low point in the 42" L1-4 Service Water (P41) return piping in the Unit 2 Auxiliary Building to facilitate draining of the 42" header.

Summary

- I. No. The operation of the Service Water system will not be altered as a result of this DCP. The drain line valve will be closed and the line capped during normal operation. The modification will be made in accordance with Perry Installation Standards and ASME/ANSI B31.1. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The reliability of the P41 system will not be adversely affected by this change. No additional flow paths are created and the line will be capped during normal operation. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The Service Water system is not addressed by Technical Specifications nor does its operation affect the bases for any Technical Specification. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-072

Source Document: USAR CR 93-010
FCR 17234

Description of Change

This change will allow the storage of up to two High Integrity Containers (HIC) containing spent resin in the Radwaste Building. The USAR currently requires metal tanks for storing resin and the minimization of plastics in the plant.

Summary

- I. No. The fire hazard from storing two polyethylene HICs containing spent resins in the Radwaste Building has been evaluated and found to be acceptable as has the radiological hazard. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. There is no safe shutdown equipment in this area. The size and weight of the HICs do not exceed that of the steel tanks previously used. The storage area is surrounded by a concrete wall that will contain any spills and floor drains provide drainage to the liquid radwaste drain system. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This change will not adversely impact the fire suppression capability in this area nor is any safe shutdown equipment located in this area. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-073

Source Document: DCP 91-274, Rev. 0

Description of Change

This design change switches the control complex elevator power supply from the Division II diesel generator backed distribution panel 1R2580009 to the non-diesel backed panel R25S005.

Summary

- I. No. The control complex elevator is non-safety and does not require diesel backing. Removing this load will reduce the Division II diesel generator loading by approximately 50 amperes which improves the loading capability of the diesel generator. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The control complex elevator has no safety related function and the diesel generator loading should be made more reliable by this change. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. Diesel generator operability is not reduced by this change and the elevator does not affect any Technical Specification related equipment. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-074

Source Document: DCP 93-047, Rev. 0

Description of Change

This design change adds a 2" drain line and valve to the low point in the 24" L1-4 Service Water (P41) return piping in the Unit 1 Auxiliary Building to facilitate draining of the 42" header.

Summary

- I. No. The operation of the Service Water system will not be altered as a result of this DCP. The drain line valve will be closed and the line capped during normal operation. The modification will be made in accordance with Perry Installation Standards and ASME/ANSI B31.1. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The reliability of the P41 system will not be adversely affected by this change. No additional flow paths are created and the line will be capped during normal operation. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The Service Water system is not addressed by Technical Specifications nor does its operation affect the bases for any Technical Specification. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-075

Source Document: DCP 93-046, Rev. 0

Description of Change

This design change removes the Mixed Bed Demineralizer (P22) system flush/purge capability for the Reactor Recirculation (B33) and the Reactor Water Cleanup (G33) samples in the Post Accident Sampling (P87) system near the sample source to prevent further contamination of the P22 system. Flushing will be performed downstream using other P22 flush lines within the system.

Summary

- I. No. The modification will be made utilizing the same design and construction materials as the original design. Flushing downstream of the sample cooler using P22 water and purging the sample lines using the sample itself satisfies the intent of NUREG-0737. Failure of the affected portions of the P87 and/or P22 systems can not cause the initiation of an accident analyzed in the USAR, nor are the affected portions of these system required for safe shutdown. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The P87 and P22 system modifications have no affect on equipment import to safety. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. Technical Specification 6.8.4.c governs the administrative agents of the P87 system. This change does not affect the system's ability to provide the samples necessary to maintain conformance with these administrative requirements. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-076

Source Document: DCP 90-012A, Rev. 3

Description of Change

This design change replaced two manual Emergency Closed Cooling (P42) system valves P42F551 and P42F550 which control water to the Control Complex Chilled Water (P47) system "C" chiller with motor operated valves. DCP 90-012A, Rev. 1 was written to install new circuits for the valve operators along with 1-hour rated fire wrap to protect the circuits. The current revision (Rev. 3) deletes the fire wrap until an acceptable wrap becomes available.

Summary

I. No. The new equipment and circuits were analyzed in all fire zones and areas where they would be installed to verify that the MOV valve isolating the line from the chiller for the method utilized for safe shutdown in the event of a fire in these areas would be able to close and remain closed in order to provide the necessary cooling water for the system. These raceways have been analyzed for separation from the redundant train of safe shutdown components and circuits and the protection of the redundant train in these areas meets the requirements of 10CFR50 Appendix R Section III G or has a previously approved deviation of like application.

The new circuits terminate in the MOVs which are separated by only 6 ft. To protect these valves, fast response type sprinkler heads have been provided about 6 ft. above the valves. There is also an area sprinkler system at ceiling level and area fire detection. The routing of the conduits extend the separation to 16 ft. at the level of the valves and to over 20 ft. near the ceiling. This increase in separation, along with the reinforcement of the fire suppression capabilities where the separation is less than 15 ft., provides for an equivalent level of protection for these conduits as is provided for the redundant MOVs. An hourly fire watch is present in the area due to the generic problems with the 1 hour fire rating for other wrap in the area. This compensatory action meets the requirements of the approved fire protection program for any fire rated barrier that is degraded or removed with detection on one side of the barrier. The fire watch, separation and protection limits the potential for a fire affecting the conduits of both divisions of valves until the cable protection is installed. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.

II. No. This revision does not impact the equipment or protection of the P42 system described in the Safe Shutdown Capability Report in a manner required for safe shutdown. It does not increase the fire hazard or degrade fire suppression so it will not alter the effect a fire would have on any equipment important to safety.

SE No.: 93-076 (Cont.)

Summary (Cont.)

The Emergency Closed Cooling System has been analyzed as operating with the P42F551 and P42F550 valves closed to achieve and maintain safe shutdown. This revision will not affect this analysis. Operation of this system is addressed in existing operation instructions. The revision does not involve changes to operator actions or post fire repairs required to achieve shutdown due to damage to the systems incurred by the fire in the area of the cable wrap installation. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.

- III. No. This revision does not alter P42 system operation in any way, nor does it affect any other equipment relied upon in the Technical Specification. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-077

Source Document: SCN 00387-ISS-2155, Rev. 0

Description of Change

This specification change allows the use of appropriate off-site material as Class B fill. The previous specification required the use of lower till material that had been excavated on-site during construction and stockpiled for use as Class B fill. The stockpiles of this material have been depleted.

Summary

- I. No. The off-site material will be tested to ensure that the properties of the replacement soil are similar to those of the depleted on-site material. The placement requirements remain unchanged. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. There is no change to the performance requirements of the Class B fill. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The off-site material will provide adequate backfill and will not interfere with the ability of any structure, system or component to perform its intended function. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-078

Source Document: PAP-0525, Rev. 2

Description of Change

This change to Plant Administrative Procedure (PAP)-0525 "Solid Radwaste Administration", allows the Radwaste Unit to operate the vendor-supplied "wet waste" processing equipment in lieu of the vendor supplied technicians. Numerous format and editorial changes are being made that do not impact radwaste processing or shipping as described in the USAR or the Process Control Program (PCP).

Summary

- I. No. The processing will continue to be performed in accordance with the Perry Process Control Program. The operators will receive training equivalent to that received in the vendor training program. All operation will be under the vendor's NRC Topical Report. Maintenance of the equipment will be in accordance with approved vendor procedures. Home office vendor support will be available as needed. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- II. No. The only change being made is in the employment of the radwaste operators. Training will be equivalent and the equipment will remain the same. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. All processing will remain in accordance with Technical Specifications. This change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-079, 93-169

Source Document: DCN 4202, Rev. 0

Description of Change

This design change removes the roughing filters from the Drywell Cooling (M13) system during normal operation. The filters will be utilized only during outage periods.

Summary

- I. No. Removal of the filters during normal operating periods will not adversely affect the operation of the M13 system. This is a recirculation system and very little dust loading occurs during normal operation. The filters will be reinstalled during outage periods when dirt and dust is introduced into the drywell. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The purpose of this change is to eliminate a source of debris with the potential for clogging the Emergency Core Cooling System strainers in the suppression pool. M13 system performance will remain within specification. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The M13 system function, operation and design all remain within specification following this change. Drywell area average temperature limits will continue to be complied with. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-080

Source Document: NR 93-N-090, Revisions 0 through 5

Description of Change

This nonconformance report dispositions repairs to allow the "Temporary Use-As-Is" of the Service Water (P41) system until RFO-6. This NR repairs deficiencies on the 48", 42" and 30" diameter P41 supply side fiberglass piping.

Summary

- I. No. The P41 system is a non-safety related system and is not required for the safe shutdown of the plant. These changes will not alter system flow for Unit 1. The 30" supply to Unit 2 is being blanked off, thus isolating potential break locations from the active/pressurized Unit 1 piping. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The operation of the P41 system is unaltered by the disposition of this NR. The "blanking off" of the 30" P41 supply line does not alter the Postulated Piping Failures in Fluid Systems Analysis performed in USAR Section 3.6.1.2.2 Paragraph i. Furthermore, blocking off of the 30" supply line to the Unit Two TBCC heat exchanger will provide added system reliability since the 30" fiberglass piping will no longer be a part of the "active/pressurized" Unit One P41 system. The reliability of the Unit One P41 system will be increased as a result of this NR. No additional system operational flow paths are created by this NR. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The normal operation of the Unit One P41 system as well as the plant will be unaltered following implementation of this NR. The operation of the P41 system is not addressed in the Technical Specification nor does it affect the bases for any other Technical Specification. Therefore, this proposed activity will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-081

Source Document: NR 93-N-103, Revs. 0 and 1

Description of Change

This nonconformance report dispositions "Temporary Use-As-Is" repairs to the fiberglass piping adjoining the Service Water (P41) system.

Summary

I. No. The P41 system is a non-safety class system and is constructed in accordance with ANSI/ASME B31.1 for carbon steel and in accordance with accepted industry practice for fiberglass. These changes will be made in accordance with these standards.

The current operation of the service water system will not be altered as a result of this NR. The "blanking off" of the 24" P41 return line does not alter the Postulated Piping Failures in Fluid Systems Analysis performed in USAR Section 3.6.1.2.2 Paragraph i. Furthermore, blanking off of the 24" return line from the Unit Two TBCC heat exchanger (performed at the 24" to 42" reducer) will provide added system reliability since the 24" fiberglass piping will no longer be a part of the "active/pressurized" Unit One P41 system. All Unit One system flow paths and required flow will remain unaltered by this NR disposition. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.

II. No. The reliability of the Unit One P41 system will be increased as a result of this NR. No additional system operation flow paths are created. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.

III. No. The normal operation of the Unit One P41 system as well as the plant will remain unaltered following implementation of this NR. The operation of the P41 system is not addressed in the Technical Specifications nor does it affect the bases for any Technical Specifications. Therefore, this activity will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-082
Source Document: USAR CR 93-032

Description of Change

This change clarifies USAR Sections 6.5, 7.3, 9.4, 15.7 and 15A to consistently identify only the exhaust portion of the Fuel Handling Area Ventilation (M40) system as an Engineered Safety Feature (ESF) system.

Summary

- I. No. This change does not alter or change any M40 technical information contained in the USAR. No changes are being made to the design, function or operation of the M40 system. The exhaust portion of M40 remains an ESF. The M40 ESF functions have not been affected, nor have the accident mitigation functions of M40 been impacted. The failure of M40 is not an initiator for any USAR analyzed accident or transient. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This is an editorial change. The M40 system design function and operation have not been altered. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This change is an editorial clarification to the USAR. The M40 ESF functions have not been affected. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-083

Source Document: DCP 93-048, Rev. 0

Description of Change

Superseded by SE 93-088.

SE No.: 93-084

Source Document: DCP 93-055, Rev. 0

Description of Change

This design change removes the roughing filters from the Containment Vessel Cooling (M11) system.

Summary

- I. No. The M11 system is not required to mitigate the consequences of an accident. Removal of the filters will not affect the M11 systems intended function. In order to ensure that the cooling coils continue to deliver the required cooling capabilities, the current Repetitive Tasks to inspect and clean the coils will be increased in frequency. Containment average air temperature will not exceed 90 degrees Fahrenheit. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The M11 system function will not be affected by this change. The system will continue to meet all operational and design parameters. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. Operation of the M11 system will continue to meet design and Technical Specification requirements. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-085

Source Document: NR 93-S-115, Rev. 0

Description of Change

This nonconformance report dispositions "Use-As-Is" piping support with actual stresses exceeding ASME allowables but not exceeding yield strength to remain in place until the end of RF0-4.

Summary

- I. No. The actual stresses have been evaluated to be lower than the yield strength capacity of SA-36 structural steel. This portion of piping is used only during system testing and not during normal operation. It has been declassified to non-safety. The piping and equipment have been analyzed for the applicable upset loads and it has been shown that failure will not occur. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this disposition.
- II. No. The piping has been analyzed and shown not to fail. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. Failure of the pipe and support under load will not occur nor will they affect any other equipment. Therefore, this disposition will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-086

Source Document: TXI-0161, Rev. 0

Description of Change

This Temporary Instruction (TXI)-0161, "RHR A/B Pump Suction Strainer Test", is intended to demonstrate adequate RHR pump flow with the new suction strainers partially plugged.

Summary

- I. No. The required number of ECCS systems will be operable during the performance of this test without taking credit for LPCI A and B (RHR). The RHR loop not being tested will remain in service in the shutdown cooling mode and the RHR loop being tested will be available for shutdown cooling service. Precautions are included in the TXI to trip the affected pump should the suction pressure decrease to 6 psig (i.e., indicative of strainer fouling/programs). Additionally, the temporary test hood is secured in such a manner so as to ensure that if it were to dislodge from the strainer, it would not impact any other SSC's in the suppression pool. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The RHR system will be operated within the specified parameters of the design basis. Also, the temporary test hood will be secured in such a manner so as to ensure that if it were to dislodge from the strainer, it would not impact any other SSC's in the suppression pool. Therefore, this TXI will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This TXI can only be performed in Modes 4 and 5. The Technical Specification required number of ECCS systems will be operable without taking credit for LPCI A or B. The RHR loop not being tested per this TXI will be in service for Shutdown Cooling. The TXI is written such that the loop being tested will remain available for Shutdown Cooling throughout the test. Therefore, this instruction will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-087

Source Document: USAR CR 92-015

Description of Change

This change updates the USAR to reflect changes made to drawing D-226-501, Electric Cable Tray Layout Emergency Service Water Pumphouse - 586', 6". This drawing was revised to incorporate FVA 3556-33-749. The FVA moved several non-safety cable trays slightly to improve maintenance access to the ESW sluice gates. The FVA was performed under Safety Evaluation 92-027.

Summary

- I. No. This is strictly an editorial change. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This editorial change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The editorial change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-088

Source Document: DCP 93-048, Rev. 3

Description of Change

This design change replaces the existing suppression pool ECCS/RCIC strainers with a new strainer design to minimize strainer fouling problems.

Summary

- I. No. This new design will continue to meet the original design, material and construction requirements. The RHR, LPSCS, HPCS and RCIC systems will continue to operate as designed without loss of NPSH. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This change does not reduce the level of equipment redundancy nor any design margins previously in existence. It does not introduce any new equipment type. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This new strainer design maintains the original equipment design and construction standards. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-089

Source Document: DCP 89-216, Rev. 1

Description of Change

This design change provides for the paralleling of eight computer inputs from the Process Computer system to the new 3D-MONICORE Computer system.

Summary

- I. No. The design change installs wiring and hardware for computer points required to provide an alternate method for calculating and indicating feedwater flow on the 3D-MONICORE Computer. This alternate method has already been implemented on the Process Computer per DCP 9300010 and Safety Evaluation 930036. The proposed changes will have no impact on the feedwater control loops in performing their required function as described in the USAR Section 7.7.1.4 nor will they impact the current USAR analysis in Sections 7.7.1.3 and 7.7.1.8 associated with Recirculation Flow Control System and Process Computer System, respectively. Paralleling the Process Computer points to the 3D-MONICORE Computer System will have no impact on the current analysis described in the USAR Chapters 7 and 15. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The addition of computer points to the 3D-MONICORE will require paralleling existing Process Computer points currently in service. The computer points are connected in a manner that will not affect the operation of the existing Recirculation Flow Control System nor the Feedwater Control System. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. 3D-MONICORE computer point wiring has no impact on any Technical Specification basis or margin of safety as described therein. The installation also has no impact on the proper functions of the Feedwater Control System. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-090

Source Document: SCN 00399-ISS-2155

Description of Change

This specification change revises SP-2155, "Technical Requirements for Excavation and Installation of Backfill" to allow the use of flowable fill material.

Summary

- I. No. The use of the flowable fill will be limited to those areas where regular fill is not easily applied, such as undermined areas. Engineering approval will be required for each application to ensure bearing capacity equal to or greater than the original material. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. There will be no decrease in the level of backfill performance because the flowable fill material must be approved by Engineering and it must have properties meeting or exceeding the fill material it replaces. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The flowable fill material will provide adequate backfill and will not interfere with the ability of any system, structure or component to perform its intended function. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-091

Source Document: DCP 93-032B, Rev. 0

Description of Change

This design change removes several toilet trailers and buildings from site which have potable water (P71) and service (P66) connected. These services will be capped off below grade. A new 3" water line will be tapped off the 10" P71 main. This will require a short P71 system outage.

Summary

- I. No. These modifications will improve the reliability of the P66 and P71 systems. The short outage will not adversely affect any plant systems. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The change being proposed involve the removal of service to buildings and trailers being demolished, a new water line to the new Perry Administrative building and the abandonment of the existing water line to the Start-Up Building. System reliability is enhanced while system function remains unchanged. These changes will not adversely affect any other plant required systems. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This new configuration will not adversely affect any system or operation important to safety. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-092

Source Document: DCP 93-032A, Rev. 0

Description of Change

This design change installs a new 8-inch fire main via a tee connection in the existing non-safety 8-inch main in order to provide fire protection capability to the new Perry Administrative Building.

Summary

- I. No. This change will not degrade the existing fire suppression system nor will the total fire service demand be increased. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This change affects only the fire protection system. It will not increase the severity of any fire. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This design change has no impact on the administrative aspects of the Fire Protection Program nor does it affect the Remote Shutdown System. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-093

Source Document: Condition Reports 92-251, 93-014 and 093-076

Description of Change

This evaluation examines proposed actions to minimize the spread of contamination to the Auxiliary Boilers.

Summary

- I. No. The actions taken to minimize contamination will not adversely affect any system important to safety. This safety evaluation does not allow continued operation of a contaminated boiler. The increased sampling frequency and system operating instruction (SOI) changes are in place to minimize boiler contamination and to aid in gathering data if a future contamination occurs. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The Auxiliary Boiler is non-safety and does not support any safety related equipment. The changes to the SOI and increasing sampling frequency do not alter the original design. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The Auxiliary Stem and Drain (P61) system is a non-safety related system. These changes will not adversely affect any Technical Specification equipment. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-094

Source Document: USAR CR 93-039

Description of Change

This change updates USAR Section 13.1, 13.5 and 17.2 to reflect the new Perry Site organization.

Summary

- I. No. No function or activities have been eliminated. They have only been reassigned. The qualifications of the site management remain consistent with ANSI N18.1-1971, Regulatory Guide 1.8 and Technical Specification. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This change does not alter the plant in any way nor does it adversely impact plant operation. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. Plant operations will not be adversely affected. These changes are consistent with Regulatory Guide 1.8 and ANSI N18.1-1971. Therefore, they will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-095
Source Document: DCP 91-176, Rev. 0

Description of Change

This design change replaces the existing Service Air (P51) system supply to the Building Heating (P55) system expansion tank with a nitrogen generator supplied by Instrument Air (P52). This change will minimize hydrazine depletion in the P55 system caused by exposure to oxygen.

Summary

- I. No. Replacing the pressurization medium in the expansion tank from compressed air to compressed nitrogen does not affect the operability of the P55 system. The expansion tank will continue to maintain P55 pressure above the extraction steam pressure to prevent contamination of the hot water distribution system by the extraction steam. Hydrazine has been shown to be more easily controlled in the absence of oxygen.

Operational transients and design basis accidents accident (DBAs) located in various section of the USAR analyses are unaffected by the change in pressurization medium at the expansion tank. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. These design changes to the P51, P52 and P55 systems do not degrade the reliability of any safety related component. The Building Heating System is non-seismically designed and piping and components are located so that they have no adverse affects on any safety related structure, system or component if a system failure occurs during a SSE. Therefore, these changes will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. These changes do not adversely affect any equipment required by Technical Specifications. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-096
Source Document: DCP 91-060A, Rev. 0

Description of Change

This design change replaces an existing non-regulating distribution transformer with regulating transformer to minimize voltage dips on the Division II Class 1E 120 VAC power distribution system.

Summary

- I. No. This change will enhance the operability of the Division II 120 VAC power distribution system by limiting voltage dips during large load swings. It will not adversely impact the accident analyses described in the US'. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased
- II. No. This transformer replace.. . will not impact system function and it will greatly enhance system capability, reliability and operability. It will not adversely affect any other equipment. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The Division II 120 VAC power system operability will be greatly improved by this transformer replacement. This change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-097

Source Document: PSTG, Rev. 2, TC-3

Description of Change

These changes to the Plant Specific Technical Guidelines (PSTG) are minor changes to eliminate redundancy and to improve human factoring.

Summary

- I. No. These changes do not affect any actions taken in the PEIs. They are strictly intended to make the PEIs easier to use. The same actions continue to be taken at the same point in each scenario. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. These changes do not alter any actions specified in the PSTG. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The actions and sequences have not been changed. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-098

Source Document: FCR 017764 and 017561

Description of Change

This field change permits the temporary installation of freeze seals in the 3/4" to 1-1/2" branch lines of the Two Bed Demineralizer (P21) system to allow for valve repairs.

Summary

- I. No. A failure of the freeze seal would result in a maximum leakage of less than 100 gpm which is enveloped by the USAR assumptions for flooding in the Turbine Building. This flow rate would not adversely affect any other equipment in the area. The P21 system is a non-safety system and is not required for safe shutdown. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The performance of these freeze seals will not produce any undesirable consequences for equipment important to safety. The rate of flooding is bounded by the flooding consideration in the USAR. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The operation and design of the P21 system are not relied upon within the Technical Specification base. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-099

Source Document: USAR CR 93-037

Description of Change

This change updates USAR Table 9A.3-2 regarding Emergency Lighting to reflect reviews performed in accordance with I.E. Notice 90-69. These changes are editorial. No equipment changes have been made.

Summary

- I. No. These changes are editorial. Several lighting elements were added to Table 9A.3-2 to reflect installed equipment and the numbering system was changed to reflect the plant Master Parts List (MPL) identification system. No equipment changes were made. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. These changes are editorial and do not physically affect any equipment in the plant. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. These editorial changes do not alter any equipment or operational considerations. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-100

Source Document: DCN 4199, Rev. 0

Description of Change

This drawing change revises various Piping and Instrument Diagrams (P&ID) to correct the construction coordinates.

Summary

- I. No. This change is strictly editorial. It does not alter any equipment or operating practices. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The editorial change does not alter or adversely affect any equipment in the plant. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This change is editorial and has no affect on Technical Specifications. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-101
Source Document: MFI/LLJED 1-93-041

Description of Change

This MFI/LLJED relocates the Control Room HVAC (M25) M25-C002A motor to the M25-C001 fan to restore operability of the M25/26 A train in the Emergency Recirculation (ER) mode. The A train was rendered inoperable by the failure of the M25-C001A motor.

Summary

- I. No. This temporary modification will allow operation of the M25/26 A train in the ER mode. It will still permit annunciation of loss of power for the remaining A and B train components. The M25/26 system will still be available to support plant operation; however, the A train will be able to support only the ER mode. Smoke clearing will be accomplished with the B train or by using portable blowers. Control room evacuation has been analyzed. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This temporary modification restores all modes of operation to the M25/26 system. Therefore, it will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The Technical Specification bases assume the availability of the M25/26 system in the ER mode. This change restores that mode and it doesn't diminish any other Technical Specification required conditions. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-102

Source Document: DCN 4186, Rev. 0

Description of Change

This drawing change revises P&ID 302-212, Service Water System, to reflect modifications made to the Service Water (P41) system under Safety Evaluations 93-080 and 93-081.

Summary

- I. No. This is strictly an editorial change. Equipment changes were made under other Safety Evaluations. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This editorial change does not alter any equipment or affect the operation of the plant in any way. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. No physical plant changes are being made nor are any operating practices being altered. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-103

Source Document: PTI-P42-P0001, Rev. 1

Description of Change

This change to Periodic Test Instruction (PTI)-P42-P0001, "Emergency Closed Cooling Heat Exchanger A Performance Testing", will provide for the taking of data to evaluate the capability of the Emergency Closed Cooling (ECC) (P42) A heat exchangers while in operation. This change involves the temporary replacement of installed temperature elements with more accurate instrumentation.

Summary

- I. No. The ECC system will remain fully functional with all designed safety interlocks still operable during the data collection process. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The methods implemented during data collection are consistent with the methods used for normal system operation and the equipment is more accurate. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The performance of this instruction change will not adversely affect any equipment or operation relied upon by Technical Specification. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-104

Source Document: PTI-P42-P0002, Rev. 1

Description of Change

This change to Periodic Test Instruction, (PTI)-P42-P0002, "Emergency Closed Cooling Heat Exchanger B Performance Testing", will provide for the taking of data to evaluate the capability of the Emergency Closed Cooling (ECC) (P42) B heat exchangers while in operation. This change involves the temporary replacement of installed temperature elements with more accurate instrumentation.

Summary

- I. No. The ECC system will remain fully functional with all designed safety interlocks still operable during the data collection process. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The methods implemented during data collection are consistent with the methods used for normal system operation and the equipment is more accurate. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The performance of this instruction change will not adversely affect any equipment or operation relied upon by Technical Specification. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-105

Source Document: MFI 1-93-042

Description of Change

This Mechanical Foreign Item installs a leak sealant device (line kill) on valve 1N36F511 to eliminate a source of contamination from the Extraction Steam (N36) system to the Auxiliary Steam (P61) system.

Summary

- I. No. Valve 1N36F511 is a manual, normally closed valve which provides isolation of the cross connection between the Extraction Steam and the Auxiliary Steam systems. This cross connection is not relied upon for any accident mitigation purposes. The device, sealant and methods of construction will be in accordance with the appropriate guideline. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The operation of the N36 and P61 systems with this MFI installed represents an equivalent condition to normal operation. The components meet applicable codes. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The N36 and P61 systems are not relied upon in Technical Specifications. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-106

Source Document: Emergency Plan, Rev. 11, TC-1

Description of Change

This change to the Emergency Plan revises the Classification Flowchart and Emergency Actions Levels (EAL) to reflect the latest revision (Rev. 3) to Regulatory Guide 1.101.

Summary

- I. No. This change does not alter any equipment nor does it direct any operator actions related to plant operation. This change affects only the classification of accidents once they have occurred. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This change does not alter any plant equipment or operating procedures. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This change does not decrease the effectiveness of the Emergency Plan. It does not later any plant equipment or operating procedure. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-107

Source Document: IOI-9, Rev. 4

Description of Change

This change to Integrated Operating Instruction (IOI)-9, "Refueling", allows reactor disassembly, manipulation of a limited number of irradiated fuel assemblies (less than 10) and reactor reassembly without installing the Refueling Operation Atmospheric Radiation Monitor (D17-K650) and the Unit 1 Portable Drywell Radiation Monitor (1D21-N340). This revises SE 92-107.

Summary

- I. No. The purpose of these monitors is for personnel protection for those individuals involved with maintenance and testing during refueling. Equivalent compensatory measures have been taken to ensure personnel protection. The accident analyses are not affected by this change. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. There are no changes to plant refueling other than these personnel safety monitor changes. Equivalent compensatory actions have been taken to ensure personnel safety. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. These monitors are not described in Technical Specifications nor do they provide a safety margin for plant system and equipment. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-108

Source Document: NR 93-N-156, Rev. 1
MFI 1-93-049

Description of Change

This Mechanical Foreign Item installs a leak sealant device on a 1" Condensate (N21) drain line to prevent leakage from a weld discontinuity or a coupling in the system. The nonconformance report was dispositioned Use-As-Is with this modification installed until a weld repair can be made.

Summary

- I. No. System and plant operation remain unaffected with this temporary installation and any flooding resulting from a sealant failure is bounded by the Turbine Building flooding accident analysis. Materials and methods of construction will be in accordance with approved standards and instructions. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. System and plant operation remain unaffected with this temporary plugging of the drain line. Flooding resulting from a loss of this seal will not affect any safety related equipment and is bounded by the accident analyses. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.
- III. No. The operation of the N21 system and of the plant is not adversely affected by this disposition. Therefore, it will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-109

Source Document: DCP 91-017, Rev. 0

Description of Change

This design change increases the power circuit fuse size for the Control Room HVAC (M25) fan motors from 100 amp to 150 amps to prevent unwanted fuse operations on motor starts.

Summary

- I. No. This change will increase the reliability of the fans. The larger fuse size remains within limits specified in the National Electric Code and by the manufacturer, and will not change the operation of the plant's power distribution system. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This change will not adversely affect the operation of any equipment. Coordination of protective devices remains properly sequenced and the reliability of the fan is greatly increased. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This design change will not affect the operation of the plant's power distribution system. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-110

Source Document: NR 93-N-163

Description of Change

This nonconformance report assesses the operation of the Auxiliary Boiler in a contaminated condition caused by the inleakage from the Main Steam system. The nonconformance report provides a "Use-As-Is" disposition for the Auxiliary Boiler in this condition pending repair of the leaking valves.

Summary

- I. No. The contamination does not decrease the reliability of the Auxiliary Boiler. The additional off-site dose resulting from operating a contaminated boiler is insignificant and will not increase the dose consequences analyzed in the USAR. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The contamination will not decrease system reliability or function. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. Equipment performance remains unaltered and increased dose consequences are negligible. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-111

Source Document: DCN 4107, Rev. 0

Description of Change

This design change upgrades the Alison temperature sensors from an earlier design to the present one because of the unavailability of parts for the earlier sensors.

Summary

- I. No. The upgraded part fulfills the function within the required temperature range and does not lessen the sensitivity of the instrument. Control room and local alarms still annunciate at a minimum temperature of 225 degrees F. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This change involves the upgrade of an obsolete part. The new sensors contain a hermetically sealed connector which is an improvement over the original design and will increase the reliability of the sensor. No other new equipment has been added. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. Technical Specifications remain unaffected by this sensor change. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-112
Source Document: USAR CR 93-054

Description of Change

This change describes a corporate reorganization involving on-site personnel. It includes the establishment of a Senior Vice President-Nuclear and the reorganization of department and sections.

Summary

- I. No. No functions or activities have been eliminated. The on-site personnel involved continue to meet the ANSI N18.1-1971 and Regulatory Guide 1.8 qualification requirements for their positions and the change complies with Technical Specifications. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This change does not alter the plant in any way. No functions or activities have been eliminated. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. There are no changes being made to the plant. The personnel qualifications continue to meet the requirements of Regulatory Guide 1.8 and ANSI N18.1-1971 and the Technical Specifications. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-113

Source Document: NR 93-N-165, Rev. 0

Description of Change

This nonconformance report assesses the operation of the Auxiliary Boiler in a contaminated condition caused by the inleakage from the Main Steam system. The nonconformance report provides a "Rework" disposition for the leaking valves causing the contamination.

Summary

- I. No. The contamination does not decrease the reliability of the Auxiliary Boiler. The additional off-site dose resulting from operating a contaminated boiler is insignificant and will not increase the dose consequences analyzed in the USAR. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The contamination will not decrease system reliability or function. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. Equipment performance remains unaltered and increased dose consequences are negligible. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-114

Source Document: SVI-P53-T8305
SVI-P53-T8312

Description of Change

This change to Surveillance Instructions, (SVI)-P53-T8305 and T8312, "Type S Local Leak Rate Test of Lower/Upper Containment Airlock (Penetration P305/312) Barrel Test" provides clarification for the number of strong backs (test clamps) required to perform the lower (SVI-P53-T8305) and the upper (SVI-P53-T8312) airlock barrel test.

Summary

- I. No. This change specifies that three test clamps be used at 11.31 psig versus four test clamps at 17.25 psig. This change affects only the test conditions, not plant operation. It has been approved as an acceptable alternative by the manufacturer for providing a valid test of the airlocks. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This change does not affect plant design or operation. The barrel test will be performed safely and without over-stressing airlock components. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This change does not affect any Technical Specifications parameters. It provides a valid test at the test pressure utilized for this testing. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-115

Source Document: SOI-G36, Rev. 6, TC-4

Description of Change

This change to System Operating Instruction (SOI)-G36, "RWCU Filter Demineralizer System (Unit 1)", eliminates the requirement to operate the Containment Vessel and Drywell Purge (M14) system when backwashing an RWCW filter/demineralizer.

Summary

- I. No. The USAR contains no analyses requiring the operation of the M14 system following an accident. No changes are being made with respect to the automatic isolation features of the M14 system. Administrative limits are in place to ensure that the containment to annulus and the containment to drywell d/Ps are maintained within specification. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. Compensatory actions have been taken to ensure that the design objectives of the M14 system continue to be met. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. Administrative limits are in place to ensure that the air being added to the containment during the RWCU backwash will not increase containment pressure beyond the administrative d/P limits. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-116

Source Document: MFI/LLJED 1-93-048

Description of Change

This MFI/LLJED defeats the Steam Bypass (C85) pressure regulator error from the load demand error signal fault isolation logic.

Summary

- I. No. The load demand error signal is only used for operation in the auto load following mode. This mode is not used at Perry. Elimination of this regulator trip will have no affect on the operation of the plant. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. Removal of this trip will have no detrimental affect on the reliability of the Steam Bypass system. The fault detection logic which monitors the pressure regulator output and the bypass valve demand signals is not impacted by this change. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. Removal of this trip has no adverse impact on the ability of the Steam Bypass system to perform its intended function, nor of any other equipment to meet Technical Specification Requirements. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-117

Source Document: USAR CR 92-028

Description of Change

This change eliminates postulated breaks RHS1 and RH1LL in the recirculation piping based upon the results of GE Design Report 23A4755, Rev. 1. No new breaks are added.

Summary

- I. No. This change involves the removal of postulated breaks in the recirculation piping based upon updated analysis. No equipment changes are being made. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. There is no change to equipment or to plant operation as a result of this postulated pipe break elimination. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The Technical Specifications do not address the postulation of rupture locations within any piping system nor do they address the criteria associated with this issue. The configuration and the function of the piping remain unaltered. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-118

Source Document: DCN 4170, Rev. 0

Description of Change

This change allows the use of threaded end connections rather than socket welds for the small valves in the Two-Bed Demineralizer (P21), Mixed-Bed Demineralizer (P22) and Liquid Radwaste Disposal (G50) systems. It also allows the replacement of Dresser valves with Ladish valves in these applications to eliminate the seat leakage problems associated with the hard disc Dresser valves.

Summary

- I. No. Both the Dresser and the Ladish valves with threaded end connections meet ANSI B31-1 requirements. This change will not affect the function or operability of any system. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The replacement valves meet the material and service requirements for the systems involved. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The P21, P22 and G50 systems are not addressed by Technical Specification nor will any Technical Specification related equipment be adversely affected by these valve specification change. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-119

Source Document: PSTG, Rev. 2, TC-4

Description of Change

This change to the Plant Specific Technical Guidelines (PSTG) revises the Heat Capacity Limit (HCL), Figure 4 in the PSTG, to indicate the UNSAFE region and deletes an unnecessary (redundant) step regarding low suppression pool level.

Summary

- I. No. This change is strictly editorial. It improves the labeling of the HCL curve and removes a redundant step. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This change is editorial and does not affect the technical content of the PSTG. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This editorial change will not affect any actions or equipment required by Technical Specifications. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-120

Source Document: NR 92-S-170, Rev. 0

Description of Change

This nonconformance report provides a "Use-As-Is" disposition for operation of the High Pressure Core Spray (HPCS) waterleg pump in a degraded condition. Pump flow fell below the required 28.9 gpm at 33 psig discharge pressure.

Summary

- I. No. Analysis shows that the waterleg pump will keep the minimum flow line full of water at a discharge pressure of 27 psig or above. The pump has not degraded to this point yet. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this disposition.
- II. No. No equipment changes have been made and the waterleg pump is able to perform its intended function at the reduced flow rate of 28.1 gpm at 33 psig. Therefore, this disposition will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The waterleg pump will maintain the minimum flow line full of water at present conditions. Continued performance of pump surveillances as required by Technical Specification 4.0.5 will identify any further decrease in pump flow such that actions can be taken prior to the pump not being able to perform its intended function. Therefore, disposition change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-121
Source Document: USAR CR 93-057

Description of Change

This USAR change updates the radiological consequences information associated with a large break LOCA based upon a reanalysis of this event for Perry. The reanalysis utilizes revised information taken from a tracer gas study performed for the plant.

Summary

- I. No. The proposed change is an analytical re-evolution of an accident previously postulated to occur. No changes to the physical plant or to its operation are being made as a result of this reanalysis. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This is strictly an analytical change to the input parameter used in determining radiological consequences for a postulated design basis LOCA. No physical changes to the plant are being made. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The margin of safety applicable to this change involves the post accident dose levels. The parameters being changed in the radiological reanalysis do not affect the LPZ whole body dose or any of the EAB doses. Thus, the margin of safety remains the same for these doses. The LPZ thyroid dose is being increased (due to postulating a passive failure of an ECCS component), however, the new dose value remains below the 150 R value recognized by the NRC for the Perry Plant. It is also well below the 300 R acceptance limit of 10CFR100. Therefore, the margin of safety for this dose is considered not to be reduced. The Control Room doses for thyroid, whole body, and skin remain the same or decrease below those values previously calculated. As such, the margin of safety for these doses remain the same. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-122

Source Document: NR 93-S-172, Rev. 0

Description of Change

This nonconformance report dispositions 30A time delay fuses in the motor control centers for Main and Reheat Steam (N11) system MOVs "Use-As-Is". USAR Section 8.3 requirements for these fuses is being changed from 300% to 200% for motor full load amps (FLA).

Summary

- I. No. The change in operating point of the motors FLA will give the associated MOVs more protection under locked motor (LRA) conditions. It will not adversely impact any of the accident analyses contained in the USAR. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this disposition.
- II. No. This change will improve MOV LRA protection without adversely impacting MOV function and operability. No equipment changes are being made as a result of this disposition. Therefore, it will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. Technical Specifications 3/4-8 are concerned with the operability of the Class 1E power distribution system. These changes will not affect the function or the operability of this system. Therefore, this disposition will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-124
Source Document: USAR CR 93-059

Description of Change

This USAR change involves the manual actuation of the HVAC Charcoal Filter Plenum Deluge System. They will no longer be manually actuated from the Control Room, but rather from the local deluge valve location. This change is being implemented to reduce the current risk of accidental water intrusion into the HVAC charcoal filters.

Summary

- I. No. This change does not adversely affect the operability or function of the fire suppression system. It reduces the chances of inadvertently wetting charcoal and rendering the HVAC for charcoal absorbers less effective. All fire protection and safe shutdown systems will continue to operate as designed. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The potential for disabling charcoal absorbers reduced by this change. No other systems or equipment is effected. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This change does not adversely affect any equipment or operating practices required by Technical Specifications. Therefore, it will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-125

Source Document: NR 93-N-178, Rev. 0

Description of Change

This nonconformance report dispositions "Repair" and "Use-As-Is" a leak sealant device installed on a 0.75 inch drain line coupling on the Feedwater (N27) system to prevent leakage from a weld discontinuity or a coupling in the system until a weld repair can be made.

Summary

- I. No. Systems and plant operation remain unaffected with this temporary installation and any flooding resulting from sealant failure is bounded by the Turbine Building flooding accident analysis. Materials and methods of construction will be in accordance with approved standards and instructions. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. System and plant operation remain unaffected with this temporary plugging of the drain line. Flooding resulting from a loss of this seal will not affect any safety-related equipment and is bounded by the accident analysis. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The operation of the N27 system and of the plant is not adversely affected by this disposition. Therefore, it will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-126

Source Document: NR 93-N-180, Rev. 0

Description of Change

The nonconformance report dispositions "Repair" and "Use-As-Is" a leak sealant device on a 1.5 inch elbow on the 1B MSR shell pocket drain to prevent leakage from a pin hole leak on the elbow, until a weld repair can be made.

Summary

- I. No. System and plant operation remain unaffected with this temporary installation and any flooding resulting from sealant failure is bounded by the Turbine Building flooding accident analysis. Materials and methods of construction will be in accordance with approved standards and instructions. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. System and plant operation remain unaffected with this temporary plugging of the drain line. Flooding resulting from a loss of this seal will not affect any safety-related equipment and is bounded by the accident analysis. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The operation of the MSRs and of the plant is not adversely affected by this disposition. Therefore, it will not reduce the margin of safety as defined in the basis for any Technical Specification.

SE No.: 93-127

Source Document: SOI-E22A, Rev. 4, TC-7

Description of Change

This change to System Operating Instruction (SOI)-E22A, "High Pressure Core Spray System", incorporates alternate HPCS keepfill methods.

Summary

- I. No. The only accident/transient analyzed in Chapter 15 which is initiated by the HPCS System is Inadvertent HPCS Startup (USAR Chapter 15.5.1). This transient assumes a manual startup of the HPCS System (i.e., operator error). The source of keepfill (the water leg pump or one of the alternate keepfill methods) will not affect the probability of an operator error that could start the HPCS Pump. HPCS pump discharge pressure is high enough to close the HPCS Flush Line Check Valve (1E22-F003) against Two Bed Demineralizer (P21) pressure. For all analyzed USAR accidents/transients in which the HPCS Pump starts, the use of alternate keepfill will not create an alternate injection path. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. Alternate keepfill from the CST has already been demonstrated viable and P21 system pressure is within the normal bounds of HPCS system pressure. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. Technical Specifications 3.5.1 and 3.5.2 require the HPCS System to be maintained filled with water to ensure the minimum possible injection time and to minimize the potential for water hammer. Both of the analyzed methods are capable of achieving this. Furthermore, since HPCS Flush Line Check Valve (1E22-F003) has not been inservice tested in accordance with Technical Specification 4.0.5, the HPCS System is declared inoperable whenever using the Two Bed Distribution System to supply keepfill. When the HPCS System is declared inoperable, actions will be taken in accordance with T.S. 3.5.1 or 3.5.2 as required. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-128

Source Document: DCN 4254, Rev. 0

Description of Change

This drawing change allows an alternate, equivalent bearing housing to be substituted for the obsolete bearing housing on the ECCS waterleg pump.

Summary

- I. No. The substitute bearing housing meets the original design, material and construction specifications. Pump performance will not be adversely affected by this part substitution. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The substitute bearing housing meets the original design, material and construction specifications. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This part substitution meets all of the material and construction requirements of the original part. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-129

Source Document: ONI-N11, Rev. 5

Description of Change

This change to Off Normal Instruction (ONI)-N11, "Pipe Break Outside Containment (Unit 1)", incorporates the Emergency Procedure Guidelines (EPG), Revision 4 Secondary Containment Control Guidelines.

Summary

- I. No. ONI-N11 is entered after an accident or transient has occurred. Once entered, attempts are made to mitigate the accident or transient. This change results in a plant shutdown, cooldown and depressurization at least as rapid as that assumed in the USAR, and in many cases, more rapid than that assumed in the USAR. This will result in a quicker leak isolation and will reduce the radiological consequences of analyzed accidents. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. ONI-N11, with this change incorporated, attempts to mitigate the accident or transient by isolation of the leak source. All actions taken are within the range of analyzed actions in the USAR. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. ONI-N11 actions may result in exceeding the Technical Specification 3.4.6.1 maximum cooldown limit of 100°F in any one hour period. Emergency depressurization is bounded by the USAR analysis and Technical Specification 3.4.6.1 requires an engineering evaluation prior to repressurization. The actions of ONI-N11 will drive the plant to Cold Shutdown conditions which establishes the "or" part of the Action statement (or be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the following 24 hours. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-130

Source Document: MFI/LLJED 1-93-056

Description of Change

This Mechanical Foreign Item installs a temporary reset switch for RPS channel "D". The present switch is malfunctioning.

Summary

- I. No. This modification installs a parallel switch using similar equipment but in a different panel. It does not affect the operation or function of the switch and is installed so as not to interfere with any other equipment. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This modification utilizes like equipment (switch and wiring) and does not change the function or operation of the RPS "D" channel. It does not interfere with the operation of any other equipment. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This modification does not adversely affect any equipment required by Technical Specification. Therefore, this change will not reduce the margin of safety as defined in the basis for any Technical Specification.

SE No.: 93-131

Source Document: USAR CR 93-061

Description of Change

This change updates the USAR to reflect the title change from Licensing and Compliance Section to Regulatory Affairs Section.

Summary

- I. No. This is strictly an editorial change. No functions or activities were eliminated. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This change simply revises an organization's name. It does not alter the plant in any way. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. No changes have been made to the plant or to any functions or activities described in the Technical Specifications. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-132

Source Document: DCP 93-032D, Rev. 0

Description of Change

This design change modifies the Storm Drain Sewer (P67) system to accommodate the construction changes associated with the site completion project.

Summary

- I. No. The changes being made do not alter the function or the capability of the P67 system. They provide for additional paths for storm water to enter the system. The accidents analyzed in the USAR assume a complete blockage and failure of the P67 system. Yard flooding is controlled by grading the site to slope away from plant buildings. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. Building flooding is not controlled by the P67 system, nor is P67 connected to any other plant system. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The P67 system is not addressed by Technical Specifications nor are any plant systems affected by it. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-133
Source Document: DCP 89-050, Rev. 0

Description of Change

This design change adds a charcoal filter to the Controlled Access Area HVAC (M21) system exhaust ducting to filter contaminants from the oil analysis lab fume hoods.

Summary

- I. No. The addition of this filter will have no effect on overall system performance. The balancing damper in this branch is greater than 50% closed without the filter installed. It will be adjusted as necessary to rebalance flow. This filter will remove contaminants which have been prematurely poisoning the charcoal in the main exhaust unit. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. System function and reliability will not be adversely affected by this change, nor will this change adversely affect any other system or equipment. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This change will not adversely affect any equipment required by Technical Specifications. All design parameters in the USAR will continue to be met. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-134

Source Document: MFIs 1-93-058 and 1-93-059

Description of Change

These Mechanical Foreign Items temporarily install gauges, vent valves and fittings in order to monitor the HPCS injection Valve 1E22F0004 and the RCIC injection valve 1E51F0013 for the potential for pressure locking.

Summary

- I. No. The components will remain isolated via locked closed valves except during brief periods to obtain pressure readings. They will not be pressurized without being monitored. This temporary installation will not impact the ability of the permanent safety-related components to perform this intended function. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This change does not adversely affect any other equipment nor alter the operation of any permanent equipment. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. Administrative controls have been established as required Technical Specification bases 3.6.4 to ensure satisfactory operation of this equipment and to maintain Containment Integrity. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-135
Source Document: DCP 93-075, Rev. 0

Description of Change

This design change installs a continuous backfill modification to the reactor vessel level instrument reference legs off of condensing chambers 1B21D004A, B, C and D to prevent noncondensable gases from building up in the reference legs.

Summary

- I. No. This safety evaluation addresses only the fabrication and installation of this equipment. A separate evaluation will be performed prior to connecting and placing this equipment into operation. All materials and installation requirements will be met. Because this system is not connected and because it will be supported properly, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased.
- II. No. The hardware installation has been analyzed for structural integrity and it meets the applicable codes and standards. No tie-ins will be made, therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This modification is not connected to any plant systems. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-136

Source Document: DCN 3135, Rev. 0; SCN 281-DSP-E12;
SCN 276-DSP-E15 and SCN 277-DSP-E51

Description of Change

Changes to drawings, specifications and the USAR are being made to reflect an earlier design change allowing Emergency Service Water inlet temperature to rise from 80°F to 85°F. Safety Evaluations 88-387 and 90-045 addressed the increase in ESW temperature and the resulting increase in the maximum suppression pool temperature for the MSIV closure transient.

Summary

- I. No. The changes reflect corrections to the USAR text, tables, and figures; various drawings; and Piping Design Specifications DSP-E12, DSP-E15 and DSP-E51 based on approved design basis information. All of the changes are directly related to the change in the ESW system inlet water temperature from 80°F to 85°F. The increase in temperature from 80°F to 85°F was approved by Safety Evaluation 88-387. The operational data updated on D302-661 to reflect the current suppression pool temperature was previously addressed and approved by Safety Evaluation 90-0045. The requested changes do not change the physical plant in any way or change the operational basis of any system. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. These changes simply reflect a previously approved change to the ESW inlet temperature. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. Previous evaluations of the 85°F ESW Safety Evaluations 88-387 and 90-045 show no reduction in the margin of safety as defined in the Technical Specifications. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-137

Source Document: Emergency Plan, Rev. 11, TC-3

Description of Change

This is an administrative change to the Emergency Plan which deletes redundant and extraneous information, adds clarifying information and updates the telephone system descriptions.

Summary

- I. No. These are administrative changes to the existing Emergency Preparedness Program which do not alter any equipment or plant operation. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The administrative changes do not alter any equipment or plant operation. Therefore, they will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. There are administrative changes which do not affect any equipment or operation required by Technical Specifications. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-138

Source Document: DCN 4259, Rev. 0

Description of Change

This change revises the drawings of various ventilation systems to permit the removal of the supply plenum roughing filters during cold weather in order to prevent collected snow from causing low flow conditions.

Summary

- I. No. Removal of the supply plenum roughing filters during cold weather will not adversely affect the operation of these systems. Supply pressure will vary slightly but will remain within specification. Dust and dirt loading during the winter is negligible. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This change will not adversely affect any other equipment or operating practices. Air supply will remain within specification. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. System operation will remain within design limits. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-139
Source Document: DCP 93-079, Rev. 0

Description of Change

This design change increases the number of locking devices to the Inclined Fuel Transfer (IFTS) system area floor plugs, the IFTS valve room shield doors and the drywell airlock shield door in accordance with changes to 10CFR20.

Summary

- I. No. These additional locking devices will allow compliance with the new 10CFR20 regulations and will provide increased personnel protection. These changes do not affect the function or operation of any plant systems required for safe shutdown. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The modifications will not affect any equipment or operating practices required for safe shutdown. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. These modifications do not adversely affect any equipment or operation required to satisfy the bases for any Technical Specification. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-140

Source Document: PAP-0114, Rev. 0

Description of Change

This change to Plant Administrative Procedure (PAP)-0114, "Radiation Protection Program", is a new procedure which incorporates the requirements of the revised 10CFR20 into the Perry radiation protection program.

Summary

- I. No. The revisions to 10CFR20 require only an administrative change to Perry's existing Radiation Protection Program. This program does not involve any activity which could impact the design, function, or operation of any plant system or component. Accident analysis is not affected. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This is strictly an administrative change to an existing program. It does not alter any plant equipment or operation required for safe shutdown of the plant. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The NRC is preparing a Generic Letter to provide additional guidance to ensure Technical Specification compliance with the revised Part 20. In the meantime, a letter from NRR dated June 30, 1993 allows the current Technical Specifications to be utilized after January 1, 1994 until such time that the Technical Specifications are changed. The limiting factors for the current effluent technical specifications are based on 10CFR50 Appendix I dose limits. These values have not changed and are still applicable. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-141

Source Document: DCP 90-280A, Rev. 0

Description of Change

This design change installs an independent closed circuit television (CCTV) camera system on the auxiliary platform to provide better viewing capabilities during refueling.

Summary

- I. No. The structural adequacy of the auxiliary platform for all loading conditions has been verified with the increased loading by the CCTV positioner. A CCTV positioner is within the bounds of the single fuel bundle drop accident previously analyzed. Therefore, neither the probability of occurrence nor consequences of a previously analyzed accident will be increased by this change.
- II. No. Beyond the possibility of a dropped CCTV positioner which has already been analyzed, there are not possibilities for equipment interaction which could adversely affect any equipment important to safety. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The CCTV camera positioner system will improve the platform operation during core verification and vessel internal inspection. There is no change to the auxiliary platform. Therefore, all operating requirements associated with the auxiliary platform and fuel handling equipment, i.e., load limits, as defined in the Technical Specifications load limits will continue to be met. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-142

Source Document: SOI-F11/15, Rev. 5

Description of Change

This administrative change to System Operating Instruction (SOI)-F11/15, "Fuel Handling, Refueling and Auxiliary Platforms", involves the clarification of the type jumper installed and identification of a USAR paragraph number change.

Summary

- I. No. The technical changes associated with using a jumper were approved under Safety Evaluation 90-193. The current changes are strictly administrative to reflect revised terminology in the tagging program and revised USAR paragraph numbering. No changes to plant equipment or operation are being made. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This is strictly an administrative change. No changes to equipment or operation of the plant are being made. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. This administrative change does not alter any plant equipment or operation. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-143

Source Document: DCP 92-048, Rev. 0

Description of Change

This design change replaces obsolete Two-Bed (P21) and Mixed Bed Demineralizer (P22) system acid and caustic pumps with new pumps by the same manufacturer but with different baseplate dimensions and piping connections. This change also adds as-built information to the P&ID associated with these pumps.

Summary

- I. No. The new pumps are manufactured by the original equipment manufacturer (Pulsafeeder) with the same horsepower, materials of construction, and motor controls. They have capacities and design ratings suitable for the service conditions. The newer model pumps have different baseplate dimensions and inlet/outlet piping connections which necessitates this change. The baseplate and piping materials used with the new pumps are the same as those supplied with the original pumps stations. None of the changes above affects the design function or operation of the system. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. The P21/P22 systems are non-safety and do not supply water to systems important to safety. The changes in the pump and the P&ID are considered equivalent to the currently reviewed and approved design. The pumps and new piping meet the material and service requirements for the P21/P22 systems, and the changes do not adversely affect the function or operation of the system nor any other system. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The P21/P22 systems are not addressed by Technical Specifications. In addition, the Technical Specification licensing bases parameters are not affected by the pump and P&ID changes. The Technical Specification water quality limits are not changed or affected by this change. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-144

Source Document: USAR CR 93-065

Description of Change

This USAR change updates Section 9, 11, 12, and 15 to reflect NRC revisions to 10CFR20. It also updates the USAR with respect to Zn-65 concentration (SE 92-173).

Summary

- I. No. These changes which reflect the revised 10CFR20 do not impact the design, function or operation of any plant system or component. The revised calculated Zn-65 concentration was evaluated as acceptable under Safety Evaluation 92-173. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. These changes are administrative. They do not change any activity which could impact the design, function, or operation of any plant system or component. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. The NRC is preparing a Generic Letter to provide additional guidance to ensure Technical Specification compliance with the revised Part 20. In the meantime, a letter from NRR dated June 30, 1993 allows the current Technical Specifications to be utilized after January 1, 1994 until such time that the Technical Specifications are changed. The limiting factors for the current effluent technical specifications are based on 10CFR50 Appendix I dose limits. These values have not changed and are still applicable. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-145

Source Document: DCP 92-161, Rev. 0

Description of Change

This design change strengthens the design of the valve stem coupling on the 2" Control rod drive scram discharge valves 1C11F0011 and F0181.

Summary

- I. No. This modification utilizes a higher strength steel for the coupling and for the fasteners and minimizes the removal of material required for assembly. The design of the coupling and fasteners remain equivalent in fit and function. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. This coupling design using higher strength materials was evaluated and found to be acceptable with respect to the existing lower strength actuator and valve stem materials. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. Valve function for stroking closed in the event of reactor scram is not affected by this design change because the stem coupling fit and form are essentially equivalent. This function will be verified in the DCP by performing SVI-C11-T2004 and SVI-C11-T2200 following coupling installation. On the basis of the above equivalency and testing, the valve function to provide isolation of the scram discharge volume as described in Section 3/4.1.3 of the Plant Technical Specifications is fully maintained. All other design margins for the Control Rod Drive system and these valves are maintained. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-146

Source Document: DCP 87-671, Rev. 5

Description of Change

This design change installs communication jack stations in the Unit 1 Drywell for the R51 PA system, the R52 Maintenance and Calibration Jack system and the R55 PBX telephone system to facilitate communication.

Summary

- I. No. The R51, R52, and R55 Communication systems are all nonsafety-related. They have no interaction with any other plant system. Their failure will not adversely affect any other plant equipment. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. Failure of any of other communication system will not adversely affect any system or equipment important to safety. Therefore, this change will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. These added phone jacks will not interfere with the proper operation of any Technical Specification related equipment. Therefore, this change will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-148

Source Document: MFI 1-93-061
TXI-0166, Rev. 0

Description of Change

This temporary modification to the plant installs a system which purges the reference leg of the shutdown and upset range reactor pressure vessel (RPV) level instrumentation, using the Control Rod Drive Hydraulic system (C11) as a water source. The purge system is isolated from existing plant systems except for performance of TXI-0166, which will verify stable level indications during normal plant evolutions which include RPV level changes and control rod manipulations. This plant change and test is in response to Generic Letter 92-04 and NRC Bulletin 93-03, which addressed potential outgassing from BWR reference legs causing false level indications. A complete system description is evaluated in Safety Evaluation 93-166.

Summary

- I. No. This purge system installation affects RPV instrumentation which only provides indication, and will not affect engineered safeguard actuators. Purging the reference leg of this instrumentation increases level indicator reliability, which augments consistent operator response under upset and shutdown conditions. Check valves prohibit draining of the instrument reference leg through purge system breaks, and C11 makeup flow is limited by a flow restricting orifice. Plant evolutions performed during TXI-0166 are already covered by plant procedures and are analyzed in the USAR. In addition, TXI-0166 contains administrative controls to ensure that tests are performed in operational conditions that do not impact Technical Specifications. The break of an instrument line as analyzed in USAR 15.6.2 bounds any consequence of purge system failure. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. Restricting orifice or check valve protection prohibits adverse effects on interfacing water supply (C11) and reference leg systems. The purge system installation is also analyzed to assure no seismic or fall-down impacts on previously installed safety related equipment. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The Technical Specification Bases and interfacing systems are not adversely affected by any of these changes. Therefore, margins of safety so defined are not reduced.

SE No.: 93-149

Source Document: EDCRs 93-7018, Rev. 0 and 93-7032, Rev. 0

Description of Change

This safety evaluation is intended to examine all aspects of the Site Completion Project which have not been covered by specific safety evaluations.

Summary

- I. No. Flooding is the only concern which has not been specifically eliminated through the other safety evaluation. Completion of this project does not adversely affect the drainage capability of the site. Plant buildings will remain protected from flooding. Therefore, neither the probability of occurrence nor the consequences of a previously analyzed accident will be increased by this change.
- II. No. Plant structures remain protected from flooding. Therefore, these changes will not create the possibility for an accident or malfunction of a different type than any previously evaluated.
- III. No. Flooding of buildings and plant structures will not occur as a result of these changes. Therefore, they will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 93-151
Source Document: DCP 93-085, Rev. 0

Description of Change

This design change modifies the actuator of the low pressure core spray (LPCS) minimum flow valve to increase torque/thrust capability. Increased actuator torque was determined by revised valve operational loading calculation in accordance with Generic Letter 89-10. With this change, valve stroke time increases about 2 seconds.

Summary

- I. No. The probability of USAR event occurrence is not affected by this change. Valve reliability is increased with higher activator torque. Consequences of analyzed events are not adversely affected. For purposes of maintaining adequate core cooling in the LPCS mode, USAR Section 6.3.3 defines minimum required injection flow under stated conditions (the "licensing bases"). Although the minimum flow line takes 2 seconds longer to isolate, thereby diverting an estimated 20 gallons of coolant injection, the amount by which actual LPCS flow exceeds the flow required to meet core cooling safety margin results in net core cooling flow, in the required time frame, which still exceeds the licensing basis. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change maintains original system configuration and functions, and creates no new system interactions. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Valve reliability is increased to provide greater assurance of full LPCS injection flow to the reactor vessel. Core cooling safety margins are maintained by exceeding the licensing basis LPCS injection flow versus time with actual demonstrated system performance capability. Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.

SE No.: 93-152

Source Document: DCP 93-110B, Rev. 0

Description of Change

This design change modifies the actuator of the low pressure coolant injection (LPCI) valve to increase torque/thrust capability. Increased actuator torque was determined by revised valve operational loading calculations in accordance with Generic Letter 89-10. With these changes, valve stroke time increased about 5 seconds.

Summary

- I. No. The probability of USAR event occurrence is not affected by this change. Valve reliability is increased with higher actuator torque. Consequences of analyzed events are not adversely affected. For purposes of maintaining adequate core cooling in the LPCI mode, USAR Section 6.3.3 defines minimum required injection flow under stated conditions (the "licensing basis"). Although the time to injection valve full open is increased 5 seconds from 2¹/2 to 32 seconds, LPCI rated flow is achieved with the injection valve approximately 60% open. Sufficient core cooling flow is delivered to meet safety margins defined in the licensing basis. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change maintains original system configuration and functions, and creates no new system interactions. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Valve reliability is increased to provide greater assurance of timely LPCI injection to the reactor vessel. Core cooling safety margins are maintained by exceeding the licensing bases' LPCI injection flow versus time with actual demonstrated system performance capability. Therefore, the margin of safety as defined in the bases for any Technical Specifications will not be reduced.

SE No.: 93-153

Source Document: DCP 93-0085A, Rev. 0

Description of Change

This design change modifies the actuator and power supply circuit for the low pressure core spray (LPCS) injection valve to increase torque/thrust capability. Increased actuator torque was determined by revised valve operational loading calculations in accordance with Generic Letter 89-10. With these changes, valve stroke time increased about 5 seconds.

Summary

- I. No. The probability of USAR event occurrence is not affected by this change. Valve reliability is increased with higher actuator torque. Consequences of analyzed events are not adversely affected. For purposes of maintaining adequate core cooling in the LPCS mode, USAR Section 6.3.3 defines minimum required injection flow under stated conditions (the "licensing bases"). Although the time to injection valve full open is increased from 27 to 32 seconds, LPCS rated flow is achieved with the injection valve approximatley 40% open. Sufficient core cooling flow is delivered to meet safety margins defined in the licensing bases. In addition, power supply circuit modifications dulicated existing circuit routing to meet separation and fire protection criteria in compliance with 10CFR50 Appendix R and (Fire Protection) as further described in USAR Appendix 9A. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change maintains original system configuration and functions, and creates no new system interactions. Increased power cable size will improve voltage at the valve motor and reduce I2R heat loads. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Valve reliability is increased to provide greater assurance of timely LPCS injection to the reactor vessel. Core cooling safety margins are maintained by exceeding the licensing bases LPCS injection flow versus time with actual demonstrated system performance capability. Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.

SE No.: 93-154

Source Document: MFI 1-93-061

TXI-0166, Rev. 0, TC-3

Description of Change

This revision to the plant modification, to evaluate purging of reactor vessel level instrumentation reference leg, changes the method of limiting backfill flow rate. The restricting orifice between the Control Rod Drive Hydraulic system (C11) and the purge system is eliminated. Maximum flow is controlled by adjusting two C11 supply line needle valves located in a locked enclosure.

Summary

- I. No. The consequences of any purge system tubing breaks are bounded by USAR 15.6.2. The range of reactor vessel pressure transients analyzed in USAR Chapter 15 are accommodated by purge system design so that purge flow continues in an acceptable range to maintain reliable level indication. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment is not important to safety previously evaluated in the USAR is not increased.
- II. No. A line break in the purge system (3/8 inch diameter) would result in insignificant flow relative to C11 makeup capacity; restricting orifices also protect the scram accumulators from excessive loss of inventory. The needle valves used to limit C11 flow are already part of the purge system. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. More reliable reactor levels allow more predictable, consistent operator response. Safety functions provided by interfacing systems are not affected. Therefore, the margin of safety as defined in the bases for any Technical Specifications will not be reduced.

SE No.: 93-155

Source Document: USAR CR 93-068

Description of Change

These editorial drawing changes to USAR Figures 6.2-60 (Sheets 2 and 3), Containment and Drywell Isolation, reflect pre-existing plant design information not previously shown or shown incorrectly:

- Added PCV F205 and safety clarification to the containment side of line no. 30(b).
- Changed outboard isolation valve position switch designation on line nos. 28(b) and 38(a).
- Added complete designation to inboard containment purge supply valve PCV F195 in line no. 30(a), and system designations to components in drywell vacuum relief line no. 39(a).

Summary

- I. No. These editorial additions and changes in no way effect safety-related structures, systems, or components design or function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See item I above.
- III. No. The Technical Specification Bases are not affected by any of these changes, therefore margins of safety so defined are not reduced.

SE No.: 93-156

Source Document: DCP 93-075, Rev. 1

Description of Change

This design change installs the equipment to allow continuous purging of the reactor vessel level instrument reference legs. This safety evaluation addresses only the installation of purge control stations and connections to the Nuclear Boiler system (B21) and Control Rod Drive Hydraulic system (C11), installation of an in-line orifice to isolate purge control station debris from the level reference leg line, and termination of water supply line to removed equipment with a threaded cap (to avoid draining the Mixed-Bed Demineralizer system and back purging for a socket-weld cap). According to this safety evaluation, the new purge system will remain isolated from B21 and C11 by Engineering Hold Order until analysis of potential system interactions and other operability assessments are complete. This modification is being installed in response to Generic Letter 92-04 and NRC Bulletin 93-03, which addressed potential outgassing in BWR reference legs causing false level indications.

Summary

- I. No. Isolation of the new backfill system from plant systems previously analyzed in the USAR prevents system interactions until their effects are satisfactorily analyzed. The installation meets applicable seismic criteria regarding system interactions. The threaded pipe cap design meets applicable codes and standards to maintain system integrity. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. With the new system isolated from B21 and with seismic-related interactions evaluated and found acceptable, no other interactions with safety-related structure, systems or components are possible. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. With the new system isolated from B21 and C11, the Technical Specification Bases are not affected by any of these changes. Therefore, margins of safety so defined are not reduced.

SE No.: 93-160

Source Document: DCP 93-075, Rev. 2

Description of Change

This design change installs the equipment to allow continuous purging of the reactor vessel level instrument reference legs. This safety evaluation addresses only the installation of a vent valve inside the purge control panels to facilitate system filling, suppression chambers inside the purge control panel to dampen control rod drive (CRD) hydraulic system perturbations, and several corrections to as-built drawings to relocate a tubing support and to eliminate pipe interference. According to this safety evaluation, the new purge system will remain isolated by Engineering Hold Order until analysis of potential systems interactions and other operability assessments are complete. This modification is installed in response to Generic Letter 92-04 and NRC Bulletin 93-03 which addressed potential outgassing from BWR level instrument reference legs causing false level indications.

Summary

- I. No. Isolation of the new backfill system from plant systems previously analyzed in the USAR will prevent system interactions until their effects are satisfactorily analyzed. The installation meets applicable seismic criteria regarding system interactions. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. With the new system isolated and with seismic-related interactions evaluated and found acceptable, no other interactions with safety-related structure, systems or components are possible. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. With the new system isolated, the Technical Specification Bases are not affected by any of these changes. Therefore, margins of safety so defined are not reduced.

SE No.: 93-161

Source Document: DCP 93-075, Rev. 3

Description of Change

This design change installs the equipment to allow continuous purging of the reactor vessel level instrument reference legs. This safety evaluation addresses only installation details and resolution of a tubing interface. According to this safety evaluation, the new purge system will remain isolated by Engineering Hold Order until analysis of potential systems interactions and other operability assessments are complete. This modification is installed in response to Generic Letter 92-04 and NRC Bulletin 93-03 which addressed potential outgassing from BWR level instrument reference legs causing false level indications.

Summary

- I. No. Isolation of the new backfill system from plant systems previously analyzed in the USAR will prevent system interactions until their effects are satisfactorily analyzed. The installation meets applicable seismic criteria regarding system interactions. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. With the new system isolated and with seismic-related interactions evaluated and found acceptable, no other interactions with safety-related structure, systems or components are possible. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. With the new system isolated, the Technical Specification Bases are not affected by any of these changes. Therefore, margins of safety so defined are not reduced.

SE No.: 93-166

Source Document: DCP 93-075, Rev. 4

Description of Change

This design change completes installation of a continuous backfill modification to the reactor vessel level instrument reference legs of condensing chambers 1B21D004A, B, C and D to prevent noncondensable gases from building up in the reference legs. This safety evaluation addresses performance of initial testing, system operability, and potential system interactions in order to cancel an Engineering Hold Order on system operations. This modification is installed in response to Generic Letter 92-04 and NRC Bulletin 93-03, which addressed potential outgassing from BWR level instrument reference legs causing false level indications.

Summary

- I. No. This design change improves the reliability of reactor vessel level indications, thereby improving operator response and the consistency of associated reactor water level automatic trips and other actuators. Instrument Reference Leg Purge Control System performance has been verified by performance testing under various plant evolutions which include reactor water level changes within normal operating range, and control rod drive (CRD) operations (CRD charging water is the source of water for the purge system). Regarding system integrity, safety-related portions of the system, including control stations, meet seismic design criteria applicable to Seismic Category 1 equipment. Existing reference leg lines are isolated from non-safety portions of the new system by two check valves in series which will be included in the Inservice Inspection Program to assure continuing integrity. Any tubing breaks (all inside containment) are bounded by USAR Section 15.6.2, "Instrument Line Pipe Break". The range of reactor vessel pressure transients analyzed in USAR Chapter 15 are accommodated by purge system design so that purge flow continues in an acceptable range to maintain reliable level indication. Separation of Purge Control Stations protects against loss of redundant level indications from a localized fire. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The CRD Hydraulic system (C11) which provides water to the subject purge system is isolated by two check valves in series, which are included in the Inservice Inspection Program to assure continuing operability of reactor vessel level instrumentation in the event of C11 depressurization. Conversely, a line break in the purge system (3/8 inch diameter) would result in insignificant flow relative to C11 makeup capacity; restricting orifices also protect the scram accumulators from excessive loss of inventory. Regarding operating interactions, in-line surge suppression chambers serve to stabilize purge system/reference leg pressure from CRD operating cycles. In

SE No.: 93-166 (Cont.)

II. No. (Cont.)

addition, consequences of Purge Control Station failures which could pass debris into the reference leg and cause false level or pressure signals, are prevented by an in-line restricting orifice. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.

III. No. More reliable reactor vessel level I & C functions make associated margins of safety for reactor core protection more predictable. Safety functions provided by interfacing systems are not affected. Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.

SE No.: 93-175
Source Document: USAR CR 93-081

Description of Change

This evaluation analyzes changes to the USAR concerning additional containment bypass leakage penetrations. These penetrations are associated with the Reactor Core Isolation Cooling (RCIC) system. These penetrations will be included in Table 6.2-33 and in the Local Leak Rate Testing (LLRT) program.

Summary

- I. No. This change to the USAR does not affect any safety-related equipment, system configuration, or related function. By adding these penetrations to the LLRT program, greater demonstrated assurance of the containment leak integrity assumed in accident analyses will be maintained under worst case conditions. Total allowable containment bypass leakage will be maintained at or below the licensed limit (5.04% of total containment leakage). Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change to the USAR does not affect any safety-related equipment, system configuration, or related function. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Relevant margins of safety are verified with greater assurance of required containment leak integrity. Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.

SE No.: 93-183

Source Document: USAR CR 93-078

Description of Change

This evaluation analyzes changes to the USAR concerning the as-built configuration for the transmission lines near the plant site. The name of the switchyard is also changed.

Summary

- I. No. The actual location of transmission lines was verified during the station blackout evaluation in conjunction with tornado risk categorization, and is reflected in this USAR change. The safety function and reliability of offsite power supplies remain as described in the USAR. There is no increase in risk loss of offsite power (LOOP). Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. With station blackout risk assessments completed, and no change to design configuration or system operation, there is no impact on plant systems or performance as described in the USAR. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Power distribution system configuration and reliability remain unchanged by this change. Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.

SE No.: 93-187

Source Document: USAR CR 93-092
HPI-A0003, Rev. 0
PAP-1403, Rev. 4

Description of Change

This evaluation analyzes a change to USAR Sections 12.3.4.1 and 12.3.4.4 concerning airborne and area radiation monitor (D17/D21) setpoint methodology. The purpose of the change is to eliminate excessive alarms, establish setpoints consistent with specific plant operating experience, and to alert plant personnel to off-normal radiation levels that have the potential to violate established margins of safety.

Summary

- I. No. Affected equipment improves plant and control room radiation protection. Elimination of unnecessary alarms will improve personnel response to the more significant alarms that may occur in the future. There are no engineered safeguard actuations associated with this equipment. Several ventilation fan trips are provided to minimize the spread of airborne contamination within the plant, but have no impact offsite. The changes to setpoint methodology will assure previously established margins of safety between plant administrative limits on personnel radiation exposure and 10 CFR 20 guidelines. Plant operations will continue to satisfy applicable codes and standards cited in USAR 12.3.4. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. D17/D21 setpoints will be maintained consistent with plant operating experience. As a result, control room personnel response to significant changes will improve, which reduces the possibility of accidents going undetected. These setpoints are reviewed annually by the Radiation Protection Technical Unit to ensure that the margin of safety has been maintained and that there are no adverse trends. This will provide additional protection against degradation in equipment or operations which control radioactive material. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Margins of safety with respect to 10 CFR 20 will be maintained for protection of plant personnel. There is no impact on offsite releases from normal operations or accident conditions. Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.

SE No.: 94-003

Source Document: USAR CR 93-080

Description of Change

This change updates the diesel generator loadings as listed on USAR Table 8.3-1.

Summary

- I. No. The revision to the USAR table is meant to define the current diesel generator (D/G's) loading values for a loss of offsite power (LOOP) or LOOP/LOCA combination. The tabulated values for automatically connected equipment are within the D/G ratings. Administrative controls are in place to provide sufficient guidance to prevent operators from overloading the D/G's. The D/G's and their associated power distribution equipment are used in an accident mitigation role and are not evaluated as initiators of any of the accidents described in Chapter 15 of the USAR. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment evaluated in the USAR is not increased.
- II. No. The divisional D/G functions will remain unchanged. The same is true for the associated safety related power distribution system and Class 1E equipment. The emergency core cooling systems (ECCS) systems/functions remain as explained in USAR Section 6.3, Emergency Core Cooling Systems. This USAR update will not increase the probability of a loss of a D/G. Therefore, no new or different types of accidents or malfunctions are created by this USAR revision.
- III. No. The operability of each divisional D/G remains unchanged. Sufficient onsite power is available to supply the safety-related equipment required for the safe shutdown of the unit as well as the mitigation and control of accident conditions within the unit. Therefore, no margin of safety is reduced.

SE No.: 94-014

Source Document: USAR CR 94-003

Description of Change

This USAR change updates License Commitment (LC) #14, Instrument Setpoint Methodology. The change accounts for all of the NRC and PNPP activities that occurred during 1993, specifically the NRC's approval of the methodology and Perry's submittal of a previously committed report. This change is administrative in nature and only updates USAR Appendix 1B LC #14. It makes no other changes to the USAR or to the plant.

Summary

- I. No. This change is administrative. It updates Appendix 1B LC #14 to close the commitment regarding the submittal of an Instrument Setpoint Methodology Report. This report was submitted to the NRC October 17, 1993. Listing a report submittal does not impact the design/function/operation of the plant. USAR accident and transient analysis cannot be affected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment is not increased.
- II. No. This change updates the USAR to include the submittal of a report. The change does not evaluate nor incorporate the contents of the report. Hence, this change cannot impact the design/operation of the plant. Accident analysis is not affected. Therefore, the creation of a new accident or malfunction of equipment is not possible.
- III. No. This change updates the USAR to include the submittal of a report. The change does not evaluate nor incorporate the contents of the report. Submittal of the aforementioned report satisfies a previously made NRC commitment. The plant design is not impacted and is still being operated in a conservative manner. Hence, no margin of safety is reduced.