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Senior Vice President
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Docket Number 50-346

License Number NPF-3

Serial Number 2210

March 30, 1994

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Subject: License Amendment Application to Revise Technical Specifications and Applicable Bases for Reactivity Control Systems and Emergency Core Cooling Systems

Gentlemen:

Enclosed is an application for an amendment to the Davis-Besse Nuclear Power Station (DBNPS), Unit Number 1 Operating License Number NPF-3, Appendix A, Technical Specifications, to reflect the changes attached. The proposed changes involve Technical Specification (TS) 3/4.1.1.1, Reactivity Control Systems - Boration Control - Shutdown Margin; TS 3/4.1.2.8, Reactivity Control Systems - Borated Water Sources - Shutdown; TS 3/4.1.2.9, Reactivity Control Systems - Borated Water Sources - Operating; associated Bases 3/4.1.2, Boration Systems; TS 3/4.5.1, Emergency Core Cooling Systems (ECCS) - Core Flooding Tanks; TS 3/4.5.2, Emergency Core Cooling Systems - ECCS Subsystems - Tavg $\geq$ 280°F; TS 3/4.5.4, Emergency Core Cooling Systems - Borated Water Storage Tank; associated Bases 3/4.5, Emergency Core Cooling Systems (ECCS); and TS 3/4.10.4, Special Test Execptions - Shutdown Margin.

The proposed changes would increase the required boration flowrate in the event the required SHUTDOWN MARGIN is not met, and increase the minimum boron concentration and/or volume requirements for the Boric Acid Addition System (BAAS), Borated Water Storage Tank (BWST), and Core Flooding Tanks (CFT), thereby adding flexibility for future core designs, including the upcoming Cycle 10 reload. The proposed changes would also revise the Action statements for an inoperable BWST or CFT to make them more consistent with NUREG-1430 (Revised Standard Technical Specifications for Babcock & Wilcox Pressurized Water Reactors), and would revise the Surveillance Requirements relating to trisodium phosphate (TSP) to clarify them and make them easier to perform. Various administration and editorial changes are also proposed.

A001

Toledo Edison requests that this amendment be issued by the NRC by October 1, 1994, the currently scheduled commencement date for the Ninth Refueling Outage.

Should you have any questions or require additional information, please contact Mr. William T. O'Connor, Manager - Regulatory Affairs, at (419) 249-2366.

Very truly yours,

John K. Wood
for DCS

Enclosure

cc: J. B. Martin, Regional Administrator, NRC Region III
G. West, DB-1 NRC/NRR Project Manager
S. Stasek, NRC Region III, DB-1 Senior Resident Inspector
J. R. Williams, Chief of Staff, Ohio Emergency Management Agency, State of Ohio (NRC Liaison)
Utility Radiological Safety Board

Docket Number 50-346
License Number NPF-3
Serial Number 2210
Enclosure
Page 1

APPLICATION FOR AMENDMENT
TO
FACILITY OPERATING LICENSE NPF-3
DAVIS-BESSE NUCLEAR POWER STATION
UNIT NUMBER 1

Attached are requested changes to the Davis-Besse Nuclear Power Station, Unit Number 1 Facility Operating License Number NPF-3. Also included is the Safety Assessment and Significant Hazards Consideration.

The proposed changes (submitted under cover letter Serial Number 2210) concern:

Appendix A, Technical Specification 3/4.1.1.1, Reactivity Control Systems, Boration Control, Shutdown Margin

Appendix A, Technical Specification 3/4.1.2.8, Reactivity Control Systems, Borated Water Sources - Shutdown

Appendix A, Technical Specification 3/4.1.2.9, Reactivity Control Systems, Borated Water Sources - Operating

Appendix A, Technical Specification Bases 3/4.1.2, Boration Systems

Appendix A, Technical Specification 3/4.5.1, Emergency Core Cooling Systems (ECCS), Core Flooding Tanks

Appendix A, Technical Specification 3/4.5.2, Emergency Core Cooling Systems, ECCS Subsystems - Tavg $\geq$ 280°F

Appendix A, Technical Specification 3/4.5.4, Emergency Core Cooling Systems, Borated Water Storage Tank

Appendix A, Technical Specification Bases 3/4.5, Emergency Core Cooling Systems (ECCS)

Appendix A, Technical Specification 3/4.10.4, Special Test Exceptions, Shutdown Margin

For: D. C. Shelton, Senior Vice President - Nuclear

By: J K Wood
J. K. Wood, Plant Manager

Sworn to and subscribed before me this 30th day of March, 1994.

Evelyn L. Dress
Notary Public, State of Ohio

EVELYN L. DRESS
NOTARY PUBLIC, STATE OF OHIO
My Commission Expires July 28, 1994

The following information is provided to support issuance of the requested changes to Davis-Besse Nuclear Power Station, Unit Number 1 Operating License Number NPF-3, Appendix A, Technical Specification (TS) 3/4.1.1.1, Reactivity Control Systems - Boration Control - Shutdown Margin; TS 3/4.1.2.8, Reactivity Control Systems - Borated Water Sources - Shutdown; TS 3/4.1.2.9, Reactivity Control Systems - Borated Water Sources - Operating; associated Bases 3/4.1.2, Boration Systems; TS 3/4.5.1, Emergency Core Cooling Systems (ECCS) - Core Flooding Tanks; TS 3/4.5.2, Emergency Core Cooling Systems - ECCS Subsystems - Tavg $\geq$ 280°F; TS 3/4.5.4, Emergency Core Cooling Systems - Borated Water Storage Tank; associated Bases 3/4.5, Emergency Core Cooling Systems (ECCS); and TS 3/4.10.4, Special Test Exceptions - Shutdown Margin.

A. Time Required to Implement: This change is to be implemented within 90 days after NRC issuance of the License Amendment, or during the Ninth Refueling Outage, whichever occurs later.

B. Reason for Change (License Amendment Request Number 93-0011, Revision 0):

The proposed changes would increase the required boration flowrate in the event the required SHUTDOWN MARGIN is not met, and increase the minimum boron concentration and/or volume requirements for the Boric Acid Addition System (BAAS), Borated Water Storage Tank (BWST), and Core Flooding Tanks (CFT), thereby adding flexibility for future core designs, including the upcoming Cycle 10 reload. The proposed changes would also revise the Action statements for an inoperable BWST or CFT to make them more consistent with NUREG-1430 (Revised Standard Technical Specifications for Babcock & Wilcox Pressurized Water Reactors), and would revise the Surveillance Requirements relating to trisodium phosphate (TSP) to clarify them and make them easier to perform. Various administration and editorial changes are also proposed.

C. Safety Assessment and Significant Hazards Consideration: See Attachment

SAFETY ASSESSMENT AND SIGNIFICANT HAZARDS CONSIDERATION
FOR
LICENSE AMENDMENT REQUEST NUMBER 93-0011

TITLE:

Revision of Technical Specification (TS) 3/4.1.1.1, Reactivity Control Systems - Boration Control - Shutdown Margin, TS 3/4.1.2.8, Reactivity Control Systems - Borated Water Sources - Shutdown, TS 3/4.1.2.9, Reactivity Control Systems - Borated Water Sources - Operating, associated Bases 3/4.1.2, Boration Systems, TS 3/4.5.1, Emergency Core Cooling Systems (ECCS) - Core Flooding Tanks, TS 3/4.5.2, Emergency Core Cooling Systems - ECCS Subsystems - Tavg $\geq$ 280°F, TS 3/4.5.4, Emergency Core Cooling Systems - Borated Water Storage Tank, associated Bases 3/4.5, Emergency Core Cooling Systems (ECCS), and TS 3/4.10.4, Special Test Exceptions - Shutdown Margin.

DESCRIPTION:

The purpose of the proposed changes is to modify the Davis-Besse Nuclear Power Station (DBNPS) Operating License NPF-3, Appendix A Technical Specifications (TS) and associated Bases. The proposed changes would increase the required boration flowrate in the event the required SHUTDOWN MARGIN is not met, and increase the minimum boron concentration and/or volume requirements for the Boric Acid Addition System (BAAS), Borated Water Storage Tank (BWST), and Core Flooding Tanks (CFT), thereby adding flexibility for future core designs, including the upcoming Cycle 10 reload. The proposed changes would also revise the Action statements for an inoperable BWST or CFT and the Surveillance Requirement relating to boron concentration sampling of the CFT to make them more consistent with NUREG-1430 (Revised Standard Technical Specifications for Babcock & Wilcox Pressurized Water Reactors), and would revise the Surveillance Requirements relating to trisodium phosphate (TSP) to clarify them and make them easier to perform. Various administrative and editorial changes are also proposed. Each of these changes is described in further detail below.

TS 3/4.1.1.1, Reactivity Control Systems - Boration Control - Shutdown Margin -- Revise the TS Action statement to increase the required boration flowrate from 18 gpm to 25 gpm, in the event the SHUTDOWN MARGIN requirement is not met. Consistent with this change, revise the TS 3/4.10.4 Action Statement.

TS 3/4.1.2.8, Reactivity Control Systems - Borated Water Sources - Shutdown, and the associated TS Bases 3/4.1.2 -- Increase the minimum BAAS volume from 600 gallons to 700 gallons and increase the minimum boron concentration of the BWST from 1800 ppm to 2100 ppm.

TS 3/4.1.2.9, Reactivity Control Systems - Borated Water Sources - Operating, and the associated TS Bases 3/4.1.2 -- Revise Figure 3.1-1 "BAAS Minimum Required Volume as a Function of Boric Acid Concentration Required in Modes 1-4," increase the minimum boron concentration of the BWST from 1800 ppm to 2100 ppm, and replace the present TS Action 3.1.2.9.b with new TS Actions 3.1.2.9.b and 3.1.2.9.c, to read as follows:

b. With the BWST inoperable because of boron concentration or temperature not within limits, restore the BWST to OPERABLE status within 8 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

c. With the BWST inoperable for reasons other than boron concentration or temperature not within limits, restore the BWST to OPERABLE status within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

TS 3/4.5.1, Emergency Core Cooling Systems (ECCS) - Core Flooding Tanks, and the associated TS Bases 3/4.5.1 -- Increase the minimum boron concentration of the CFTs from 1800 ppm to 2100 ppm, and replace the present TS Actions 3.5.1.a and 3.5.1.b with new TS Actions, to read as follows:

a. With one CFT inoperable because of boron concentration not within limits, restore the inoperable CFT to OPERABLE status within 72 hours or be in HOT STANDBY within the next 6 hours and reduce the RCS pressure to less than 800 psig within the following 12 hours.

b. With any CFT inoperable for reasons other than boron concentration not within limits, restore the CFT to OPERABLE status within one hour or be in HOT STANDBY within the next 6 hours and reduce the RCS pressure to less than 800 psig within the following 12 hours.

In addition, revise Surveillance Requirement (SR) 4.5.1.b to read as follows:

b. At least once per 31 days, and within 6 hours of each solution volume increase of $\geq$80 gallons that is not the result of addition from the borated water storage tank (BWST), by verifying the boron concentration of the CFT solution.

TS 3/4.5.2 Emergency Core Cooling Systems - ECCS Subsystems - Tavg $\geq$ 280°F, and the associated TS Bases 3/4.5.2 -- Revise Surveillance Requirement (SR) 4.5.2.d.4 to remove the words "solid granular," and revise SR 4.5.2.d.6 to read as follows:

6. Verifying that when a representative sample of TSP from a TSP storage basket is submerged, without agitation, in at least one liter of 180 $\pm$ 10°F borated water from the BWST, such that the resulting concentration of TSP is less than 0.84 grams per liter, the pH of the mixed solution is raised to $\geq$ 7 (measured at 77°F) within 4 hours.

TS 3/4.5.4, Borated Water Storage Tank, and the associated TS Bases 3/4.5.4 -- Increase the minimum boron concentration of the BWST from 1800 ppm to 2100 ppm, and replace the present TS Action 3.5.4 with new TS Actions 3.5.4.a and 3.5.4.b, to read as follows:

a. With the BWST inoperable because of boron concentration or temperature not within limits, restore the BWST to OPERABLE status within 8 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

b. With the BWST inoperable for reasons other than boron concentration or

temperature not within limits, restore the BWST to OPERABLE status within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

Additional administrative and editorial changes are also proposed, as shown in the attached, marked-up changes to the Operating License.

SYSTEMS, COMPONENTS, AND ACTIVITIES AFFECTED:

The systems and components affected are the BAAS, the BWST, and the CFTs. Surveillance testing activities involving TSP chemistry are also affected.

SAFETY FUNCTIONS OF THE AFFECTED SYSTEMS, COMPONENTS AND ACTIVITIES:

Boric Acid Addition System (BAAS)

The BAAS provides sufficient concentrated boric acid solution to increase the Reactor Coolant System (RCS) boron concentration from Hot Full Power (HFP) boron concentration to the Cold Shutdown (CSD) boron concentration at any time during the operating cycle. The BWST provides alternate boration capability.

The HFP boron concentration is the concentration which maintains the reactor critical at 100% Rated Thermal Power (RTP) with an RCS average temperature of 582°F, and at equilibrium xenon conditions. The CSD boron concentration is the concentration required to maintain the reactor with a 1%Δk/k Shutdown Margin (SDM), xenon free, at 70°F, with the most reactive control rod stuck out.

Borated Water Storage Tank (BWST)

The BWST provides an alternate boration capability to the BAAS. The safety function of the BWST is to provide a sufficient supply of borated water to the Emergency Core Cooling Systems (ECCS) in order ensure adequate inventory for recirculation and to maintain the reactor with a 1%Δk/k SDM in the event of a Loss of Coolant Accident (LOCA).

Core Flooding Tanks (CFTs)

The CFTs provide the immediate reflood of the reactor following a design basis Large Break LOCA (LBLOCA) so as to ensure that the fuel cladding peak temperature will remain below the 10 CFR 50.46 criteria of 2200°F following a LBLOCA prior to the refill of the reactor by the ECCS HPI/LPI systems.

Trisodium Phosphate (TSP) Chemistry Surveillance Testing

The safety function of the TSP contained in baskets in the containment normal sump is to neutralize the acidity of the post-LOCA borated water mixture prior to establishing containment emergency sump recirculation. The BWST borated water has a nominal pH value of approximately 5. Raising the borated water mixture to a pH value of 7 will ensure that chloride stress corrosion does not

occur in austenitic stainless steels in the event that chloride levels increase as a result of contamination on the surfaces of the reactor containment building. Also, a pH of 7 is assumed for the containment emergency sump for iodine retention and removal post-LOCA by the containment spray system. The surveillance testing assures that the TSP is adequate to perform the required pH adjustment.

EFFECTS ON SAFETY:

The proposed change to TS 3/4.1.1.1 to revise the TS Action statement to increase the required boration flowrate from 18 gpm to 25 gpm, in the event the SHUTDOWN MARGIN requirement is not met, will ensure that the boration rate is adequate for restoring the required SHUTDOWN MARGIN for anticipated future core designs. The proposed change to TS 3/4.10.4 to revise the TS Action Statement to increase the required boration flowrate from 18 gpm to 25 gpm makes this Action statement consistent with TS 3/4.1.1.1. These proposed changes are in the conservative direction and would have no adverse effect on plant safety.

The proposed changes to TS 3/4.1.2.8 to increase the minimum required BAAS volume and to increase the minimum required BWST boron concentration will ensure that adequate boration capability is maintained for anticipated future core designs. These proposed changes are in the conservative direction and would have no adverse effect on plant safety.

The proposed changes to TS 3/4.1.2.9 and TS 3/4.5.4 to revise TS Figure 3.1-1 and to increase the minimum required BWST boron concentration will ensure that adequate boration capability is maintained for anticipated future core designs. These proposed changes are in the conservative direction and would have no adverse effect on plant safety.

The proposed changes to the TS 3/4.1.2.9 and TS 3/4.5.4 Action statements increase the allowable outage time for restoring the BWST to operable status, in the event the BWST is inoperable because of boron concentration or temperature not within limits. This change will allow a reasonable time period to restore the boron concentration or temperature to within limits, and is consistent with NUREG-1430, "Revised Standard Technical Specifications for Babcock & Wilcox Pressurized Water Reactors." The contents of the BWST will remain available for injection during the eight hour time period allowed for restoring the boron concentration or temperature to within limits. Therefore, there would be no adverse effect on plant safety.

The proposed changes to TS Bases 3/4.1.2 and 3/4.5.4 are associated with the above proposed changes to TS 3/4.1.2.8, 3/4.1.2.9, and 3/4.5.4 and would have no adverse effect on plant safety.

The proposed change to TS 3/4.5.1 to increase the minimum required CFT boron concentration would ensure that the minimum boron concentration of the CFTs is the same as the minimum proposed boron concentration for the BWST, as assumed in the reload analysis for the post-LOCA borated water mixture concentration. This proposed change is in the conservative direction and would have no adverse effect on plant safety.

The proposed change to the TS 3/4.5.1 Action statement increases the allowable outage time for restoring the CFT to operable status, in the event the CFT is inoperable because of boron concentration not within limits. This change will allow a reasonable time period to restore the boron concentration to within limits, and is consistent with NUREG-1430. The contents of the CFT will remain available for injection during the 72 hour time period allowed for restoring the boron concentration to within limits. The effects of reduced boron concentration on core subcriticality during reflood (post-LOCA) are minor because the initial voiding maintains the reactor subcritical. Also, the boiling of the ECCS water in the core during reflood concentrates the boron in the saturated liquid that remains in the core. In addition, the boron requirements are based on the average boron concentration of the total volume of both CFTs, therefore the effect of only one CFT being outside boron concentration limits is lessened. For these reasons, there would be no adverse effect on plant safety.

The proposed change to the TS 3/4.5.1 Action statement also changes the required ending plant condition, in the event CFT operability cannot be restored, from "HOT SHUTDOWN" to "HOT STANDBY with RCS pressure less than 800 psig". TS 3/4.5.1 is applicable in Modes 1 and 2 and in Mode 3 with reactor coolant pressure >800 psig. In Mode 3 with RCS pressure below 800 psig, the CFT motor operated isolation valves are closed to isolate the CFTs from the RCS. This allows RCS cooldown and depressurization without discharging the CFTs into the RCS or requiring depressurization of the CFTs. The above change would make the Action statement consistent with the TS 3/4.5.1 Applicability and would have no adverse effect on plant safety.

The proposed change to the TS 3/4.5.1 Action statement also would eliminate the separate Action statement (current TS Action 3.5.1.b) for a CFT inoperable due to the isolation valve being closed. Instead this condition would be covered under the proposed TS Action 3.5.1.b, which allows one hour to restore the CFT to operable status. The current TS Action 3.5.1.b states that with the CFT inoperable due to the isolation valve being closed, either immediately open the isolation valve, or proceed with a plant shutdown within one hour. As noted above, the proposed Action statement is consistent with NUREG-1430. Also, the one-hour time period allowed for restoring operability will still ensure that prompt action will be taken, minimizing the time the plant is potentially exposed to a LOCA in this condition. Therefore, there would be no adverse effect on plant safety.

The proposed change to the TS 3/4.5.1 Surveillance Requirement (SR) 4.5.1.b would eliminate the requirement to sample the CFT boron concentration within 6 hours of a solution volume increase of $\geq$80 gallons, if the solution volume increase was the result of addition from the BWST. This change is consistent with NUREG-1430. Since the water contained in the BWST is within the CFT boron concentration requirements, addition of water to the CFT from the BWST would not result in the CFT boron concentration being out of limits, and there is no need to perform a sample within 6 hours. Therefore, this change would have no adverse effect on plant safety.

The proposed changes to TS Bases 3/4.5.1 are associated with the above proposed changes to TS 3/4.5.1, and would have no adverse effect on plant safety.

The proposed change to the TS 3/4.5.2 Surveillance Requirement (SR) 4.5.2.d.4 would remove the words "solid granular" from the description of TSP. TSP was originally added to the baskets in solid granular form, however the TSP granules clump together over the years. The present TS wording is overly descriptive and could cause interpretive confusion over whether the TSP presently in the racks is "granular." The purpose of this SR is to verify a minimum volume and density of TSP, and the degree to which the TSP can be described as "granular" is irrelevant. The proposed change is a clarification and would have no adverse effect on plant safety.

The proposed change to the TS 3/4.5.2 SR 4.5.2.d.6 would allow the TSP and borated water sample sizes for pH determination to be proportionately decreased. The proposed changes would not affect the intent of the SR but would make it easier for the technician to perform the SR, would minimize radwaste, and would reduce the consequences of a potential radioactive spill. Therefore, this proposed change would have a positive impact on plant safety.

The proposed change to the TS 3/4.5.2 SR 4.5.2.d.6 would also increase the required pH value from a pH of 6 to a pH of 7, and would specify a temperature (77°F) at which the pH should be measured. The DBNPS Updated Safety Analysis Report (USAR) Sections 6.2.2.2.2, 6.3.3.2, 9.3.3.2, and 15.4.6.4 state that the post-LOCA sump mixture should be at a pH of 7 or greater prior to the recirculation phase to prevent chloride stress corrosion and ensure iodine retention. This change is conservative and would make the TS SR consistent with the USAR, and therefore would have no adverse effect on plant safety. A pH measurement temperature of 77°F (25°C) is normal practice. NUREG-0800 Standard Review Plan 6.1.1, "Engineered Safety Features Materials," specifies that all pH values are at 25°C. This change is a clarification and would have no adverse effect on plant safety.

The proposed changes to TS Bases 3/4.5.2 and 3/4.5.3 are associated with the above proposed changes to TS 3/4.5.2, and would have no adverse effect on plant safety.

The additional administrative and editorial changes proposed, as shown in the attached, marked-up changes to the Operating License, would have no adverse effect on plant safety.

SIGNIFICANT HAZARDS CONSIDERATION:

The Nuclear Regulatory Commission has provided standards in 10CFR50.92(c) for determining whether a significant hazard exists due to a proposed amendment to an Operating License for a facility. A proposed amendment involves no significant hazards if operation of the proposed facility in accordance with the proposed changes would: (1) Not involve a significant increase in the probability or consequences of an accident previously evaluated; (2) Not create the possibility of a new or different kind of accident from any accident

previously evaluated; or (3) Not involve a significant reduction in a margin of safety. Toledo Edison has reviewed the proposed change and determined that a significant hazards consideration does not exist because operation of the Davis-Besse Nuclear Power Station (DBNPS), Unit No. 1, in accordance with these changes would:

1a. Not involve a significant increase in the probability of an accident previously evaluated because no accident initiators, conditions or assumptions are significantly affected by the proposed changes.

The proposed changes would increase the required boration flowrate in the event the required SHUTDOWN MARGIN is not met, increase the minimum required volume for the Boric Acid Addition System (BAAS) and increase the minimum required boron concentration for the Borated Water Storage Tank (BWST) and the Core Flooding Tanks (CFT). The proposed changes would also revise the Technical Specification (TS) Action Statements for the BWST and the CFT, revise the TS Surveillance Requirement relating to boron concentration sampling of the CFT, and would revise the TS Surveillance Requirements involving trisodium phosphate chemistry. In addition, various administrative and editorial changes, including changes to the TS Bases, are proposed. As stated above, none of these proposed changes involve accident initiators, conditions, or assumptions.

1b. Not involve a significant increase in the consequences of an accident previously evaluated because no accident conditions or assumptions are affected by the proposed changes.

The proposed changes for the minimum required boron concentrations and volumes for the BAAS, BWST, and CFT comply with existing requirements to maintain a 1%Δk/k shutdown margin (SDM) at all times, and are consistent with reload and LOCA analysis. Therefore, the accident condition assumption of 1%Δk/k SDM at the initiation of an accident will still be met and the radiological consequences will be as previously evaluated.

The proposed changes do not alter the source term, containment isolation, or allowable releases. The proposed changes, therefore, will not increase the radiological consequences of a previously evaluated accident.

2a. Not create the possibility of a new kind of accident from any accident previously evaluated because no new accident initiators or assumptions are introduced by the proposed changes. As stated in 1a, the proposed changes do not affect any accident initiators and are not initiators themselves. The proposed changes do not alter any accident scenarios.

2b. Not create the possibility of a different kind of accident from any accident previously evaluated because the proposed changes only affect existing components, systems, and functions and do not introduce any new requirements that cannot be met with the existing components, systems, and functions. The proposed changes do not alter any accident scenarios.

3. Not involve a significant reduction in a margin of safety. The proposed changes to the minimum required boron concentration and volumes for the BAAS, BWST, and CFT would ensure the margin of safety for reactor subcriticality is maintained at all times for anticipated future core designs.

The proposed change to the TS Action statement to increase the required boration flowrate in the event the SHUTDOWN MARGIN requirement is not met, would ensure that the boration rate is adequate for restoring the required SHUTDOWN MARGIN for anticipated future core designs.

The proposed changes to the TS Action statements for the BWST and the CFT ensure that the plant is maneuvered in a timely and conservative manner, without challenging any plant systems, while minimizing the time the plant would be exposed to a LOCA with assumptions not being met.

The proposed changes to the TS Surveillance Requirements associated with trisodium phosphate chemistry would clarify the requirements, make it easier to perform testing, minimize radwaste generation, and reduce the consequences of a potential radioactive spill. The proposed changes would also make the requirements consistent with the DBNPS Updated Safety Analysis Report.

The proposed change to the TS Surveillance Requirement associated with boron concentration sampling of the CFT would eliminate an unnecessary requirement and make the Surveillance Requirement consistent with NUREG-1430.

None of these changes would adversely affect the margin of safety.

CONCLUSION:

On the basis of the above, Toledo Edison has determined that the License Amendment Request does not involve a significant hazards consideration. As this License Amendment Request concerns a proposed change to the Technical Specifications that must be reviewed by the Nuclear Regulatory Commission, this License Amendment Request does not constitute an unreviewed safety question.

ATTACHMENT:

Attached are the proposed marked-up changes to the Operating License.