

AMS-94-002

Of 8

January 17, 1993

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

SUBJECT: Quad Cities Nuclear Station Units 1 and 2 Changes, Tests, and Experiments Completed NRC Docket Nos. 50-254 and 50-265

Enclosed please find a listing of those facility and procedure changes, tests, and experiments requiring safety evaluations completed during the month of November and December 1993, for Quad-Cities Station Units 1 and 2, DPR-29 and DPR-30. A summary of the safety evaluations are being reported in compliance with 10CFR50.59 and 10CFR50.71(e).

Respectfully,

COMMONWEALTH EDISON COMPANY QUAD-CITIES NUCLEAR POWER STATION

(Anthony M. Scott

System Engineering Supervisor

AMS/dak

Enclosure

cc: J. Martin, Regional Administrator

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SAFETY\NRC.LTR

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Incorporated the updated testing requirements of the Third Ten Year Interval Inservice Testing (IST) Program and upgraded the procedure to the specifications of the station procedure writers guide.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because QCAP 410-1 is administrative in nature. The purpose of the procedure is to establish performance monitoring requirements in order to meet the Third Tan Year Interval Inservice Testing Program and the ASME Section XI code. This procedure does not provide detailed direction for component, system, or plant operation. However the requirements of this procedure are to be incorporated into separate testing surveillance procedures. The surveillance procedures will have a 10CFR50.59 screening/evaluation performed separately.
- The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

SE-93-163 BLTA Removal To Offsite Location I.P. 312

DESCRIPTION:

This change allowed the use of the Monorail Auxiliary Hoist and the Jet Pump (JP) grapple to load the canister containing the six (6) BLTA fuel rods into the shipping cask (NLI - 1/2).

SAFETY EVALUATION SUMMARY:

- The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Bundle Drop

UFSAR SECTION 15.7.2

- The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because neither grapple will unlatch if a loss-of-air condition were to occur. The JP Grapple will only be used to move the shipping canister, not a fuel bundle. And this will only occur within the fuel pool. The canister weighs less than a fuel bundle. The Monorail Auxiliary Hoist is designed to move fuel and all the protective limits (overload, and overtravel) will be checked prior to use.
- The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

SE-93-164

Temp Alt for U1 Main Steam Line/Electromatic Relief Valve Vibration Monitoring Instrumentation Installation

DESCRIPTION:

In order to monitor vibrations on the B Main Steam line and the 3E Electromatic Relief Valve (ERV), instrumentation was installed during the Unit One short outage, November 1993. A total of 9 accelerometers and 2 strain gauges were installed. Three accelerometers were installed at the 3E ERV discharge flange. Three accelerometers were installed at the 3E ERV actuator. Three accelerometers were installed on the B Main Steam line near the 3E ERV. Two strain gauges were installed on the 3E ERV standpipe. The accelerometers were installed along with mounting brackets which have been fabricated for this application. The accelerometers on the B Main Steam line were secured to the steam line using 1/2" Carbon Steel Banding Tape. The accelerometers on the 3E ERV actuator were mounted just below the actuator base using two of the four actuator housing bolts which secure the actuator to the pilot valve actuator bracket. The two bolts being used are longer than the standard mounting bolts to accommodate the thickness of the accelerometer mounting bracket. The accelerometers on the 3E ERV discharge flange were mounted using one of the flange studs. This stud is longer than the standard studs to accommodate the thickness of the accelerometer mounting bracket. The 2 strain gauges on the 3E ERV standpipe was tack welded in place. Cabling from the instrumentation has been routed to the X-102B penetration. On the outside of the drywell, the cabling was routed to the Data Acquisition System which collects and processes the raw data.

SAFETY EVALUATION SUMMARY:

- The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

SE-93-164 CONTD

The accidents which meet these criteria are listed below:

Small Break LOCA	UFSAR	SECTION	15.6.2
Inadvertent Opening of a Safety Valve, Relief Valve,			
or Safety Relief Valve	UFSAR	SECTION	15.6.1
Inadvertent Closure of			
Main Steam Isolation Valves	UFSAR	SECTION	15.2.4
ATWS - Closure of MSIV's	UFSAR	SECTION	15.8.1

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the installation of the vibration monitoring equipment onto the B Main Steam Line and the 3E ERV will not create the possibility of an accident or malfunction of a type different from those evaluated in the UFSAR. The equipment installation will not adversely affect any system, structure, or component. The seismic qualification of the main steam lines will not be affected by the weight of the instrumentation and the mounting brackets. The strain gauge installation will not adversely impact the relief valve standpipe, per S&L analysis. The instrumentation and mounting hardware on the ERV discharge flange along with hardware mounted on the actuator has also been evaluated by S&L for seismic impact. The seismic qualification of the ERV and ERV actuator will not be affected by the addition of the instrumentation and mounting hardware. Also, once installed, the vibration monitoring equipment will not interact in any way with the main steam system, the 3P TRV, or any other system or component.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

SE-93-165 DCR 4-93-285

DESCRIPTION:

Updated drawings to show terminal locations for TE 1/2-5741-317.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

- The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this change updates the drawings to clarify details about terminal locations on TE 1/2-5741-317. It does not physically change the components or systems. Therefore, no accident not already identified and analyzed can result from this change.
- The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

IP-360 installed a strip chart recorder to record certain HPCI parameters during the low pressure, high pressure, and cold quick start surveillance testing as required per QCOS 2300-1,5 and 13. Under steady state flow conditions, the HPCI flow controller was placed in the automatic mode and 5% of the controller's full scale step changes have been initiated using the controller's self-tuning function. The flow control loop's response was observed while the system was tested under each required tech spec surveillance. The recorded responses were evaluated and the proportional band (Pb). integral (TI), and Derivative (TD) functions of the flow controller were changed accordingly in order to optimize the response of the flow control loop. The scope of this safety evaluation was to evaluate the effects of installing a strip chart recorder to monitor certain HPCI parameters. All other testing requirements for the HPCI system will be done per station accepted procedures (i.e. QCOS 2300-1, 5 & 13).

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Loss of Coolant Accident UFSAR SECTION 15.0, 15.5, 15.6, 15.8

Inadvertent Injection of HPCI UFSAR SECTION 15.5

SE-93-167 CONTD

The possibility for an accident or malfunction of a 2. different type than any previously evaluated in the UFSAR is not created because the HPCI turbine speed, pump discharge, steam supply, and turbine exhaust pressure indicator loops have not automatic safety system actuations associated with them. The indicators (PI 1-2340-2, 5, 7 and SI 1-2340-2) are not considered part of the UFSAR analysis. Because the strip chart recorder uses non-safety related power, fuses will also be used to provide isolation between safety and non-safety related power supplies. The flow controller will not be affected due to parallel circuitry or alternative output terminals being used. Also, the recorders are designed with high impedance resistors to ensure no alternative signal paths are created during operation. Additionally, the chart recorder's failure mode is that of an "open circuit". This will ensure no short circuits would occur throughout the logic circuits.

Also, the recorder's cart will be chocked to prevent any movemer due to a seismic event. This will ensure safety in maintaining the structural and electrical integrity of the 901-3 panel.

During IP-360, the flow controller's proportional band, integral, and/or derivative parameters may be adjusted to optimize the flow control's loop response time. This evolution will not render the flow controller inoperable. However, during the testing, the flow controller will be placed in manual for short durations. If an auto-initiation signal is received during this test, the U1 NSO will place the Pb, TI, and TD parameters back to the original settings and return the flow controller to its "AUTO" function immediately. Thus, the system will perform its intended safety function as before. Once the flow control loop has been tuned, QCOS 2300-13 will be performed to ensure all applicable technical specification and UFSAR requirements are met.

There are no identified failure modes or interactions more severe than a High energy line break (HELB) or inadvertent injection of HPCI. Therefore, the potential failures are still bounded by the UFSAR.

3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

Changed the drawings to reflect the "as-built": condition of the plant. This involved deleting a pressure control valve from bypass line 1/2-57176-4"-0 for the Service Water to the Control Room HVAC "A" train. Proper location of the Service Water branch to the "B" Control Room HVAC system was also changed to match the existing plant conditions.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because no physical changes to the existing system are being made by this change. The pressure control valve has never existed and is not needed because the Service Water system already has a pressure control valve in the line upstream of where this valve is shown on the drawings. Showing the correct location of the Service Water branch to the "B" Control Room HVAC system will not cause an accident or malfunction to occur. There is no possibility of an accident or malfunction different from those already evaluated to occur due to this change.
- The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

Provided new and revised P&IDs and C&IDs for the High Pressure Coolant Injection (HPCI) system based on the "asbuilt" configuration per system walkdown. Vendor equipment, instrumentation and piping has been added to provide greater detail for maintenance and repair activities. System function and operation remains unchanged. Component classification changes were required based on components function, operation and isolation of the safety-related HPCI system.

SAFETY EVALUATION SUMMARY:

- The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

- The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the function of the HPCI system and its ability to operate is unchanged due to documenting the "asbuilt" piping configuration on the new and revised P&IDs and C&IDs. UFSAR Section 6.0 Table of Contents, Section 6.2 Table 6.2-7, Section 6.3.2.3, Section 6.3 Figure 6.3-14, Section 6.3 Table 6.3-13 and Section 11.2 Figure 11.2-1 will require minor editorial changes. These changes, per the attached preliminary FSAR submittal review form QTP 200-S6, will not adversely impact systems or functions nor will the possibility of an accident malfunction be created that is different from those previously evaluated in the SAR.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

Provided new Key Diagram and Wiring Diagram for the 125 VDC Main Bus 1A-2 based on the "as-built" configuration per system walkdown and input from work requests on the system. system function and operation remains unchanged.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

- The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the function of the 125 VDC and 345 KV systems and their ability to operate are unchanged due to documenting the "As-built" wiring configuration. No changes are required to the UFSAR.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

Updated drawings to revise division designation for cable tray routing points in the Unit 1 and Unit 2 Battery Charger rooms (routing point 241 in Unit 1 and routing points 872, 873 and 875 in Unit 2 are being revised to Division II). Also, revise Division/Segregation Code for 5 cables associated with the station battery and charger system. System function or operation is not affected by this DCR.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this DCR does not change any plant structure, equipment or component. It does not affect any plant operations or maintenance procedures. Therefore, it does not create the possibility of an accident or malfunction different from those previously evaluated in the SAR.
- The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

Provided new Key Diagram and Wiring Diagram for the 125 VDC Main Bus 2A-2 based on the "as-built" configuration per system walkdown and input from work requests on the system. System function and operation remains unchanged.

SAFETY EVALUATION SUMMARY:

- The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

- The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the function of the 125 VDC and 345 KV systems and their ability to operate are unchanged due to documenting the "as-built" wiring configuration. No changes are required to the UFSAR.
- The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

Updated drawings to show new Equipment Piece Numbers (EPNs) and circuit/device descriptions, add relay contact developments for existing relays, add wiring termination point information to schematic diagrams, and to show the wiring terminated on the side of terminal blocks as it appears in the field for the equipment associated with the breaker control circuits at 4kV Switchgears 23 and 24. Miscellaneous wiring codes were also revised on several drawings. System function and operation is not affected by this DCR.

SAFETY EVALUATION SUMMARY:

- The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

- The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this DCR does not change any plant structure, equipment, or component. It does not affect any plant operations or maintenance procedures. Therefore, it does not create the possibility of an accident or malfunction different from those previously evaluated in the SAR.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

M04-1-87-002E RHR Service Water Pump Casing

DESCRIPTION:

This design dampened the vibration amplitudes occurring at vane-pass frequency by angling the volute inlet edges (cut-water). This decreased the dynamic forces causing the vibration.

SAFETY EVALUATION SUMMARY:

- The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

LOCA (bounding)

UFSAR SECTION 15

- The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this design will modify the RHRSW pump internals by angling the volute's inlet edges (cut-water). This will decrease the dynamic force created by the interaction between the impeller vane pressure wake and the volutes, reducing the vibration amplitudes occurring at vane-pass frequency. The reliability of the pump and its components are increased and pump performance will be improved. No new accidents or equipment malfunctions are created by this design.
- The margin f safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

Installed misc equipment, associated cable installations and terminations for electrical supervision on the Unit 1 CO2 system Electro-Manual Pilot valve.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Fire

UFSAR SECTION 10.6

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because Section 10.6 of the UFSAR does not specifically identify which fire protection detection systems are required to have electrical supervision only that "all alarm circuits are either electrically supervised or are tested to assure operability" wiring changes involved in this scope of work are to provide an electrical circuit between the limit switches on the EMPCs and the XL3 panel. Any failures in this circuit (either new or existing equipment) will be identified to the Control Room by the XL3 supervisory system. The existing function of the Limit switches being replaced (provide local annunciation) will be maintained by using limit switches containing two form C contacts. One pair of these contacts will be rewired and used per the original design intent, and the second set is to be monitored by the XL3 system.

SE-91-366 CONTD

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because during the performance of work identified in this package, backup suppression and twice per shift fire watches will be maintained for the affected areas.

The purpose of the Control Room Chart Recorder Replacement Project was to replace the recorders with standard models to improve maintenance (by improving the availability of spare parts and eliminating obsolete equipment) and to allow simulator fidelity.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

LOCA Inside Containment UFSAR 15.6.5 (Bounding)

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the replacement recorders have been evaluated by BWRSD, HFE, and S&L. The proposed replacements have been found to be suitable for the applications.

The recorder models were selected for use by IMD, OP Dept, Human Factors Engineering, and Site Engineering.

Since the recorders are suitable for the application and of a quality at least as high as the original recorders, it is unlikely that the installation of the recorders could cause an accident of any kind. Testing and Quality Control specified by SEC in the MPC approval letter should insure that no inadvertent changes could cause an accident.

P04-1-92-048 CONTD

3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

M4-1-87-003-A Chemistry Equipment Rooms

DESCRIPTION:

This modification installed a non-safety related, prefabricated equipment room (8' X 16'L X 8' H), in Unit 1 Reactor Building. Electrical distribution, demin. water and drainage is provided for the room. Room Location is Elev. 640'-6" Southwest Side of the U1 Reactor Building.

SAFETY EVALUATION SUMMARY:

- 1. The probability of an occurrence or the consequence of an accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR is not increased because this modification entails the design and installation of non-safety related, Chemistry Equipment Rooms (8'W X 16'L X 8'H) constructed of 1/2" vinyl covered gypsum board with rigid polystyrene core. The modification does not effect any design basis accident or single failure event scenarios previously analyzed in the FSAR.
- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because failure models and effects analysis demonstrates no new accident or malfunctions are created by this modification. There is no safety related equipment adjacent to or within the rooms.
- 3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because this modification introduces no changes to the Technical Specification basis. All conditions applicable to this modification are enveloped by existing basis analysis. The margin of safety is not reduced in any significant way as a result of this modification.

SE-91-480 Functional Test for Mod M04-1-87-051-B WR Q92344

DESCRIPTION:

Functional Test of Sequence of Events Recorder (SER) messages for inputs associated with cables terminated in Beta Panel per work request Q92344.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this functional test is being performed concurrently with OAD's construction test. During this test, alarms will be simulated one at a time from the 901-34 panel and the actual initiating devices will be unaffected. Each point will be undergoing testing for less than 1 minute and the operator will know at all times what windows are under test so that he will be able to monitor plant parameters associated with that alarm when necessary.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

SE-91-479 Functional Test for M4-1-87-51-B WR Q92343

DESCRIPTION:

Functional test of sequence of Events Recorder (SER messages for inputs associated with cables terminated in Beta Panel per Work Request No. Q92343.

SAFETY EVALUATION SUMMARY:

- The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this functional test is being performed concurrently with OAD's construction test. During this test, alarms will be simulated one at a time from the 901-34 panel and the actual initiating devices will be unaffected. Each point will be undergoing testing for less than 1 minute and the operator will know at all times what windows are under test so that he will be able to monitor plant parameters associated with that alarm when necessary.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

M04-1-84-037-C Fire Protection

DESCRIPTION:

Installed fire suppression and detection systems for sprinklers in Unit 1 Trackway Hatch.

SAFETY EVALUATION SUMMARY:

- 1. The probability of an occurrence or the consequence of an accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR is not increased because fire suppression and detection is not classified as Safety Related in the FSAR. Seismic installation of equipment ensures adequate operation of existing safety equipment and safety related equipment in the immediate area of installation.
- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the installation does not interfere with any existing safety systems.
- 3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because suppression and detection is not Safety Related. The reliability of the Fire Protection system is increased by providing this additional suppression and detection.

SE-92-199 Minor Design Change P04-1(2)-91-128

DESCRIPTION:

Routed fiber optic computer cables from the Control Room to the Service Building second floor communications room 205. Four cables were run to each unit and two cables were run to the center desk. To accomplish this, the cables were routed through the floor of the Control Room to non division cable trays in the Cable Spreading Room. The cables were then routed through the non division cable trays and converged at an existing conduit on the south wall of the Cable Spreading Room. All ten cables were then run through the conduit to the new communications room 205 in the Service Building.

Six fire penetrations were crossed:

- 1 Service Building to Cable Spreading Room
- 1 Cable Spreading Room to Control Room Center Desk 1 Cable Spreading Room to Control Room Unit 1 Desk
- 1 Cable Spreading Room to Control Room Unit 1 typer table
- 1 Cable Spreading Room to Control Room Unit 2 Desk
- 1 Cable Spreading Room to Control Room Unit 2 typer table.

SAFETY EVALUATION SUMMARY:

- The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Fire in the cable spreading room UFSAR SECTION 9.5.1 Seismic events UFSAR SECTION 3.7

SE-92-199 CONTD

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because since the MDC will only add computer cables for the purpose of connecting the Control Room Personal Computers to the station network, the overall operation of the plant, in any mode, will not be affected. A failure of the new computer cables would only affect the ability of the Control Room Personal Computers to connect to the station network. The failure of the computer cables will not create the possibility of any accident or malfunction different from those evaluated in the UFSAR.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

Installed a union on the HPCI rupture disc leakoff line 1-2308-1" LX.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Loss of Coolant Accident UFSAR SECTION 15.6.5

- The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this change installs a means to disconnect the HPCI rupture disc leakoff line. The function of this line remains unchanged. Therefore, there will be no impact on the HPCI system and its function.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

SE-93-79 E04-2-93-053

DESCRIPTION:

Provided a new tie back support and repaired the sheared of drain pipe on the Electromatic Relief Valve 3E.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the addition of the support should minimize the shearing of the drain piping and allow for a more reliable operation of the Electromatic Relief Valve.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

SE-91-386 P04-2-91-073

DESCRIPTION:

Modified condensate booster pumps seal cooling piping to provide a 5 GPM flow rate to the seals.

SAFETY EVALUATION SUMMARY:

- The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this change pertains strictly to the condensate booster pump and does not interact with any other system. Therefore no new failure mode is introduced.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

M04-2-88-052A RCIC Pump Discharge Check Valve

DESCRIPTION:

Installed a new RCIC pump discharge check valve, 1301-50, and removed the air operator, control switch, indicating lights and associated conduit.

SAFETY EVALUATION SUMMARY:

- 1. The probability of an occurrence or the consequence of an accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR is not increased because operation of the new check valve is identical to that of the existing check valve, therefore, system performance is not affected. Reliability of the check valve should be improved by the addition of a dual elastomer seat on the valve disc and a replaceable seat to allow easy replacement should the seat become worn. The probability of an occurrence is not increased.
- The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because no new possibility for an accident or malfunction is created. The air operator for the valve is to be removed, however, testing of the valve can still be accomplished by the addition of a hand lever attached to the valve disc. There are currently no requirements for routine testing of this valve.
- 3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because this modification will not affect RCIC system operation, therefore, the margin of safety is not reduced.

M04-1(2)-80-12 High Radiation Sampling System

DESCRIPTION:

Modified existing sampling systems in order to meet the requirements of NUREG-0578-Section Z.1.8.a. This modification consisted of installing equipment especially designed for the design conditions, placed in new sample buildings (one for each unit), piping and connectors for the collection and disposal of sample fluids, and accessary equipment.

SAFETY EVALUATION SUMMARY:

- The probability of an occurrence or the consequence of an accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR is not increased because the modification is designed to the same criteria as the existing sampling system.
- The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the new equipment is of similar type as the existing equipment, except it is especially designed for handling of high radioactivity materials.
- 3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because the modification improves the capability of the sampling system both following a design basic accident and at lower activity levels.

This exempt change disconnected and removed the existing high voltage and signal cables from the 2-1705-2C main steam line radiation monitor (MSLRM) to the 2-1734C main steam line radiation monitor detector. Two new cables were pulled for the monitor. The cables, while not like for like, are the system designer's recommended replacement. Both cables are routed from the control room together in a 1" conduit. The rigid conduit run was cut in up to 10 places and flex conduit installed. This allows the cable to be pulled without major modification of conduit pull points. The flex conduit is used as a pull point.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Control Rod Drop UFSAR SECTION 15.4.10

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the 2C MSLRM channel operation will not be affected by this exempt change. The replacement cabling meets or exceeds all design requirements for the system. The flex conduit installations are to be installed in accordance with Electrical Installation Work Specification T-3382. The change will have no impact on the function of the cables, nor will they degrade the integrity of the cable separations with other MSLRMs. No new equipment failures

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will be created by this change. Existing equipment failures will remain the same with no increased impact on operating modes. This change can not impact the function of this or any other system so as to create a transient or accident different from those already analyzed in the UFSAR.

3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

SE-93-32 Exempt Change E04-2-93-025

DESCRIPTION:

Installed thermocouples on the Turbine Bypass Valve downstream pipelines.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

- The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the addition of thermocouples to the pipe surface of the turbine bypass lines does not impact any other systems. The thermocouples will be secured to the pipe surface with a hose clamp and covered with insulation. Leads will extend out of the insulation slightly to allow for connection to a portable measuring device. The function of the thermocouple is to allow for local monitoring only. There are no inputs to any other systems or components.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore the safety margin is not reduced.

This exempt change added grounding wires on the conduit, cable trays, junction boxes, and panels between the SRM and IRM detectors (under the reactor vessel) and the preamp panels 2201-15A and 2201-15B (outside the drywell). The grounding wires are connected to the station grounding grid.

The purpose of the installation was to reduce the electrical noise being picked up on these instrument cables. The noise causes spurious spikes and trips on the SRM and IRMS.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

LOCA (Loss of Coolant Accident) UFSAR SECTION 15.6.5

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the Exempt Change has been designed and installed in accordance with CECo standards. There is no known hazards (failure modes) or new system interfaces created by grounding the conduit, cable trays, junction boxes, and control panels.

Therefore, there is no new accident that has been made more likely or severe by the installation.

3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

E04-1-93-062 Redesign Annunciator Master Silence Switch

DESCRIPTION:

This exempt change replaced the existing master silence annunciator switch and circuit with a new master silence switch and circuit which has an automatic reset feature in addition to reset and override indicating lights. The existing master silence switch and indicating lights are also located in control room panel 901-5.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

ATWS

UFSAR SECTION 15.8

- The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because no change has been made which affects any of the bounding conditions of the UFSAR accident analysis. All bounding conditions remain the same and no new accidents are introduced by this Exempt Change.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

SE-93-12 Component Replacement C04-1(2)-92-066

DESCRIPTION:

Replaced the four 6" diameter drywell cooling ducts to the MSIV pilot solenoids with ductwork of a heavier gauge. The purpose of the ductwork is to blow air on the solenoid section of the Valves A01-203 1A-1D.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the drywell duct work to the MSIV pilot solenoids will not impact the MSIV pilot solenoids so as to create the possibility of an accident. The drywell cooling system is non-safety related and not assumed to function during an accident. The MSIV pilot solenoids are designed to close and be leak tight during the worst conditions.
- The margin of safety, as defined in the basis for any Technical Specification, is not reduced because this component replacement for the drywell ductwork will not affect the temperature that the MSIV pilot solenoid is exposed to, therefore the current temperature limit does not reduce the margin of safety.

Installed strainers in the Reactor Building Basement Corner Room floor drains and trough drains and on the discharge side of the Reactor Building Floor Drain Sump Isolation Valves (1(2)-4899-121, 122, 123, and 124)).

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Flooding

UFSAR SECTION 3.4.1.2.2

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the design function of the ECCS Room Floor Drains and the Reactor Building Floor Drain Sump Isolation valves is not altered by this installation of the strainers. The strainers will prevent debris from entering the isolation valves, making them more reliable to perform their intended function of isolating the ECCS Pump Rooms from flooding in the event of a Torus rupture or other such event.

The existing floor drains do not have any type of strainer installed in them. If the installed strainers were to fail in some manner it would be no different than having no strainer installed at all, which is the existing condition of the floor drains. The strainers will be inspected on a weekly basis. If the strainers are found to have holes, are plugged, or missing they will be replaced with new strainers. Also, the strainers are not able to pass into

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- the sump due to the size of the strainers and the configuration of the floor drain. The installation of the strainers does not adversely impact systems or functions which create the possibility of an accident or malfunction.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

The proposed change replaced the existing relief valve (1/2-5717) with a new one and add a 2-1/2" X 2" pipe reducer with a new flange. The new relief valve has a 2" diameter opening on the discharge side and a smaller bolt up flange than the old one, thus, requiring the reducer and appropriate sized flange for correct bolt up.

The reasons for the change was because the existing relief valve was worn out. Due to not being a like for like replacement, the new relief valve has a smaller flange. Because of this, a new flange and reducer was installed.

SAFETY EVALUATION SUMMARY:

- The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because there are no systems affected by this change other than the Caustic Storage Tank and Domestic Hot Water Systems. This design change will upgrade the system by allowing a relief valve with a smaller flange size to be installed, but does not alter the operating characteristics of the valve or change the relieving capability of the system.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

The existing GE Reserve Auxiliary Transformer (RAT) has been replaced by a SMIT transformer. This was installed because the existing GE transformer had begun producing higher than desired concentrations of acetylene in the transformer oil. The SMIT transformer has a slightly different configuration than the GE.

SAFETY EVALUATION SUMMARY:

- The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Loss of Auxiliary Power

UFSAR SECTION 8.3.1

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the reserve auxiliary transformer is being replaced due to reliability concerns. The replacement transformer has been procured to be a direct functional replacement. However, physical differences between the GE and SMIT transformers require the installation of new and redesigned equipment (COPS tank, fire protection, control wiring). These are considered part of the necessary equipment for the operation of transformer and protection of the plant. As such, this installation does not create an accident different than those previously evaluated in the SAR.
- The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

The existing GE Reserve Auxiliary Transformer (RAT) was replaced by a SMIT transformer. This was installed because the existing GE transformer had begun producing higher than desired concentrations of acetylene in the transformer oil. The SMIT transformer has a slightly different configuration than the GE.

The SMIT has a separate Conservator Oil Preservation System (COPS) which required a separate concrete pad. The new pad was installed approximately fifteen feet north of the existing reserve auxiliary transformer pad.

Also, the configuration differences required the redesign of the fire protection system. This includes both the detection and suppression systems. The detection system was changed to protecto-wire in place of the Fenwal fire detectors. The suppression system required replacement due to the physical differences between the GE and SMIT transformers. This required the installation of new concrete piers to support the suppression piping.

The transformer control panel wiring required revision due to the slight differences between the Ge and SMIT transformers.

SAFETY EVALUATION SUMMARY:

- The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Loss of Auxiliary Power UFSAR SECTION 8.3.1

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- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the reserve auxiliary transformer is being replaced due to reliability concerns. The replacement transformer has been procured to be a direct functional replacement. However, physical differences between the GE and SMIT transformers require the installation of new and redesigned equipment (COPS tank, fire protection). These are considered part of the necessary equipment for the operation of transformer and protection of the plant. As such, this installation does not create an accident different than those previously evaluated in the SAR.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

This exempt change installed a new fire protection system for the Unit 2 main power transformer. The existing General Electric transformer had both high and low side faults to ground and required replacement. The GE transformer was replaced by an ABB T&D transformer. The ABB transformer has a different physical configuration than the GE which resulted in the need to re-design the fire protection system.

The new fire protection system consists of a suppression and detection system. The suppression system includes the installation of piping, fittings, nozzles, and pipe supports. The detection system is comprised of protectowire and a new junction box.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine ach accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this exempt change installs a new fire protection system for the Unit 2 main power transformer. The new system consists of a fire suppression system and detection system. A new fire protection system is required due to the physical differences between the GE (old) and ABB (new) transformers. The new system provides the same function and will be operated in the same manner as the previous system. Therefore, no new types of accidents or malfunctions are created.

E04-2-93-0137 CONTD

 The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

This Exempt Change installed injection adapter and sample probes on the Reactor Feed Pumps 1-3201-A, B, C suction discharge lines. Injection probes located on each Reactor Feed Pump suction piping and sample probes located downstream of each feedwater flow nozzle prior to the common header.

These sample points are used to calibrate Feedwater Flow Elements FE-1-641A, 641B, & 641C. A tracer is injected into the Reactor Feed Pump suction lines and measured downstream at the discharge line sample elements.

This Exempt Change calibration enhancement was recommended by GE and has been successfully used at Dresden Unit 3.

The scope of this Safety Evaluation includes the installation of the injection and sample taps and hardware only. It does not include the actual injection of any tracer material, the flow element calibration test procedures, or the use of test data to "calibrate" the flow elements, which will change the reactor thermal power.

SAFETY EVALUATION SUMMARY:

- The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Loss of Feedwater Flow UFSAR SECTION 15.2 Anticipated Transients UFSAR SECTION 15.8 Without Scram (ATSW)

E04-2-93-218 CONTD

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because there is no change in system functions, since the operation of the Feedwater and Condensate Systems will be unchanged in all modes. The only failure modes identified for this Exempt Change are already addressed in the UFSAR. There were no new failure modes or system interactions created by this Exempt Change. Therefore no accident or malfunction of a type different from those evaluated in the UFSAR are introduced.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

The main control room door frame and associated hardware was replaced with new components. A temporary enclosure was constructed in order to maintain differential pressure requirements. The door and frame were replaced due to a history of maintenance problems with hinges and other hardware.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Loss of coolant

UFSAR SECTION 14.2.4

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the main control room door, frame, and associated hardware are being replaced due to a poor maintenance history of the existing door. The door is being replaced with an essentially like for like high power rifle bullet resistant door with a 5 hour fire rating. This is the same rating as the existing door and frame. The main control room door does not have any interfaces with equipment required to function during an accident condition. The door/frame does not change the operating characteristics of any equipment and does not create any new accident scenarios.

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3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because the new door and frame are essentially like for like replacements. The door will be tested following installation to assure operability.

Control Room Door and frame provide a ventilation seal to assure a positive control room pressure \geq 0.125" H20 can be maintained. The new door is essentially a like for like replacement and will be tested following installation.

During construction, control room personnel will serve as fire watch. After construction is complete the 3 hour fire barrier will be restored.

Replaced the existing Control Rod Drive (CRD) Flow Control Valves with new CDC HI-100 valves. The original valve is no longer manufactured and the new CDC HI-100 valve is identical to the original with the exception of quick change trim.

An additional air regulator will be added to the 1/2 inch air supply line to the valve actuator to reduce the operating pressure from approximately 85 psig to the 40-50 psig required by the FISHER actuator. The signal air line from the EP converter remains unchanged.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because there is no change in system function. The failure mode of both valves is the same. These valves are not assumed to perform any specific function in any accident. Any replacement valve failure would not prevent any control rod drive from performing its scram function.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

This interim procedure tested the Auto-Transfer capability of Bus 22 as a result of a loss of Reserve Auxiliary Transformer 22. The procedure involved manually actuating relay 127YT22X (RAT 22 Undervoltage relay) to simulate an undervoltage condition, resulting in an auto-transfer of Bus 22 to Unit Auxiliary Transformer 21.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Loss of One Drive Motor

UFSAR SECTION 15.3.1.2

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this procedure does not cause systems to operate contrary to their described operation in the UFSAR. This procedure changes only the method by which the initiating undervoltage signal is received by the Buss 22 feed breaker from T22. After receipt of the undervoltage signal, the systems which are affected will operate as designed. No new accidents, transients, or malfunctions of equipment are created by the performance of this procedure.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

Performed Feedwater Flow Nozzle Calibration Test, Special Test 1-176. This test consisted of injecting a non-radioactive tracer into the feedwater system and sampling downstream of the feedwater flow nozzle to determine the tracer concentration. TBCCW was utilized for sample cooling. During injection and sampling, the standby Reactor Feed Pump (RFP) was isolated.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Loss of Feedwater

UFSAR SECTION 15.2.7

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the turbine run from the RFP suction and discharge headers is designed for feedwater temperatures and pressures. The tubing size is 1/8" and 1/4". The probability of this tubing breaking and causing a malfunction of equipment important to safety is not increased due to the size and design of the tubing. Further, all tubing can be isolated at the Feedwater header.

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The response to SESR 4-1799 (attached) indicates that the impact on TBCCW to cool samples will be minimal and not detrimental to any other components or systems. The hose used to tie TBCCW into the sample coolers is rated for TBCCW pressure. Coolers are made of stainless steel designed for significantly higher pressure. TBCCW will be able to be immediately isolated in the event of a leak.

RFP isolated for less than a shift. RFP changeover to be performed in accordance with existing station procedures. Warming valves will be isolated, but this will not prevent nor harm RFP operation. The RFP minimum flow valves will be isolated at various times to prevent tracer solution from leaking into the condenser. An Operator will be assigned to standby throughout the test to open them if needed.

Conductivity projections by GE and station chemistry project a worst case conductivity increase of approximately 0.29 umho, a rubidium concentration of less than 200 ppb, and nitrate concentrations of less than 120 ppb. Impact of rubidium nitrate on the fuel and piping has been evaluated by GE and NFS (attached) and determined to be non-detrimental as long as rubidium levels remain below 200 ppb. Projected concentration is significantly less than the limit. Conductivity will stay well below the Tech Spec limit and will enter Action Level I for only a few hours. Chemistry will monitor these concentrations throughout the test.

3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

SE-93-171 QCAP 1200-2 Rev. 1

DESCRIPTION:

This revision removed the system engineer from the direct review of all DCRs. Reviews as required are performed by Engineering personnel. Steps were added to allow DCRs to be processed on site within CECo to update drawings for minor changes without assistance from Architect Engineers.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because no accident or malfunction different from those evaluated in the UFSAR is created due to this change in the process of updating design documents through the DCR process. There was no impact on the plant, operation of the plant, or equipment.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

SE-93-172 Setpoint Change Numbers 598 and 599

DESCRIPTION:

These two setpoint changes permanently changed the setpoints of time delay relays K701 and K702 from 5 seconds to 15 seconds. This was performed on both Unit One and Unit Two K701 and K702 time delay relay (TDR). The setpoint change from 5 to 15 seconds (TDDO) is required to reduce the possibility that a power/load imbalance (load rejection) and backup overspeed trip (BUOT) actually occur during weekly testing of the associated logic circuits.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Load Rejection UFSAR SECTION 15.2.2.1 (Generator Trip) W/O Bypass

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because there are no new failure modes created by implementing these setpoint changes. The additional 10 seconds per week (40 seconds per month) that the power/load imbalance circuits are bypassed by the additional time delay is considered negligible and will not affect turbine protection or turbine missiles in any way. The additional 10 seconds per week (40 seconds per month) that the BUOT circuits are bypassed by the additional time delay is considered negligible and will not affect turbine protection or turbine missiles in any way.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

SE-93-174 QCOS 6500-IP "Bus 22 Auto Transfer Surveillance"

DESCRIPTION:

This interim procedure tested the Auto-Transfer capability of Bus 22 as a result of a loss of Reserve Auxiliary Transformer 22. The procedure involved manually actuating relay 127YT22X (RAT 22 Undervoltage relay) to simulate an undervoltage condition, resulting in an auto-transfer of Bus 22 to Unit Auxiliary Transformer 21.

SAFETY EVALUATION SUMMARY:

- The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Loss of One Drive Motor

UFSAR SECTION 15.3.1.2

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this procedure does not cause systems to operate contrary to their described operation in the UFSAR. This procedure changes only the method by which the initiating undervoltage signal is received by the Bus 22 feed breaker from T22. After receipt of the undervoltage signal, the systems which are affected will operate as designed. No new accidents, transients, or malfunctions of equipment are created by the performance of this procedure.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

Added step to verify Turbine Stop and Control Valve Scram Instrumentation Functional Tests have been completed within the Tech Spec required time interval.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the change to this procedure does not impact systems or functions so as to create the possibility of an accident or malfunction of a type different from those evaluated in the UFSAR. The only tasks that would be required to be performed as a result of this change are approved plant operating surveillances that are already being performed on a routine basis.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

Added stp to verify Turbine Stop and Control Valve Scram Instrumentation Functional Tests have been completed within the Tech Spec required time interval.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the change to this procedure does not impact systems or functions so as to create the possibility of an accident or malfunction of a type different from those evaluated in the UFSAR. The only tasks that would be required to be performed as a result of this change are approved plant operating surveillances that are already being performed on a routine basis.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

SE-93-177 Temporary Alteration

DESCRIPTION:

The Temporary Alteration installed wire cages over the 1A RHRSW pump and motor sightglasses. The cages were in place while maintenance activities (Painting) were performed. Wire cages allowed for routine examination while installed.

SAFETY EVALUATION SUMMARY:

- The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

LOCA

UFSAR SECTION 15.6.5

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this change will reduce the probability of accidental damage disabling the RHRSW pump while various activities are performed in the area. The cages act as another barrier to prevent potential failures.

The cages will only be in place while the 1A RHRSW pump and vault are being cleaned and painted (Less than a week). The potential that a cage could fall off and damage a sightglass will be minimized. The added protection during the work activity will improve the overall reliability of the pump during this period.

The change does not effect the operation of the RHRSW pump. If a cage were to fall off, the pump would still be able to function. If the sightglass was damage the pump could be found to be inoperable. The RHRSW system is designed with redundant pumps and would still be capable of performing all design function.

3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

Removed the north hypochlorite sparger located in the northwest condenser waterbox because it vibrates excessively due to its no longer being attached to its pipe. The pipe was not capped off when removed because the hypochlorite sprager has holes to allow the dispersion of chemicals. These holes allow the unused hypochlorite piping to fill up with circulating water from the condenser waterboxes. The hypochlorite piping is isolated upstream to stop leaks from occurring.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicatly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Loss of Condenser Vacuum UFSAR SECTION 15.2.5

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the worst case of all failure modes are bound by the loss of condenser accident analysis. All failure modes lead to flooding under the hotwell. condensate flood protection will be maintained throughout this installation. Thus, in the event of flooding the circulating water pumps would trip at 5 foot level. Loss of circulating water pumps is a potential initiator to a loss of condenser vacuum accident.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

Provided new and revised P&IDs for the Heater Miscellaneous Vent & Drain system based on the "as-built" configuration per system walkdown. Vendor equipment, instrumentation and piping has been added to provide greater detail for maintenance and repair activities. System function and operation remains unchanged.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the function of the Heater Miscellaneous Vent & Drain system and its ability to operate is unchanged due to documenting the "as-built" piping configuration on the revised P&ID.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

This DCR revised the Master Equipment List (MEL) and the subject system's drawings to incorporate the results of Feedwater (FW) System Component Classification (CC). These results are recorded in Component Classification Binder # CC-QC013. The CC program is an ongoing controlled program that is under the supervision of Station Engineering.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

- The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the subject DCR does not involve any physical changes to plant systems, structures, equipment or components. Therefore, the function of the subject system and its ability to operate are unchanged. There is no change in any accident scenarios, since redundancy is maintained with all systems, and no new failure modes are introduced.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

Provided new and revised P&IDs and a new C&ID for the Pressure Suppression and Nitrogen systems based on the "asbuilt" configuration per system walkdown. Vendor equipment, instrumentation and piping has been added to provide greater detail for maintenance and repair activities. System function and operation remains unchanged.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the function of the Pressure Suppression and Nitrogen systems and their ability to operate is unchanged due to documenting the "as-built" piping configuration on the revised P&IDs and new C&ID. UFSAR Section 5.1 Table 5.1-2, Section 5.2.2.3, Section 5.2.2.3 and Section 6.2, Table 6.2-7 will require minor editorial changes. These changes, per the attached preliminary FSAR submittal review form QTP 200-S6, will not adversely impact systems or functions nor will the possibility or consequences of an accident or malfunction be created that is different from those previously evaluated in the SAR.
- The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

Provided new and revised P&IDS and C&IDs for the Nuclear Boiler and Reactor Recirculating piping system based on the "as-built"configuration per system walkdown. Vendor equipment, instrumentation and piping has been added to provide greater detail for maintenance and repair activities. System function and operation remains unchanged. Component classification changes were required based on components function, operation and isolation on the safety-related Nuclear Boiler and Reactor Recirculating piping system.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the function of the Nuclear Boiler and Reactor Recirculating piping system and its ability to operate is unchanged due to documenting the "as-built" piping configuration on the new and revised P&IDs and C&IDs. UFSAR Section 5.0 Table of Contents, Section 5.1 Figures 5.1-1, 5.1-2, 5.1-3 and 5.1-4, Section 5.1 Table 5.1-2, Section 7.6.2.2 and Section 9.3 Figure 9.3-13 will require minor editorial changes. These changes, per the attached preliminary FSAR submittal review form QTP 200-S6, will not adversely impact systems or functions nor will the possibility of an accident malfunction be created that is different from those previously evaluated in the SAR.
- The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

This DCR revised the Master Equipment List (MEL) to incorporate the results of NMS System Component Classification (CC). As part of this DCR, 1) no physical change was made to any system, structure or components. 2) no components were upgraded or downgraded. These results are recorded in Component Classification Binder #CC-QC016. The CC program is an ongoing controlled program that is under the supervision of Station Engineering.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Control Rod Drop Accident UFSAR SECTION 15.4.10

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this DCR does not involve any physical changes to plant systems, structures, equipment or components. The function of the NMS system and its ability to operate is unchanged. There is no change in any accident scenarios and no new failure modes are introduced.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

This DCR revised the Master Equipment List (MEL) and selected drawings to incorporate the results of SW System Component Classification (CC). As part of this DCR, 1) no physical change was made to any plant system, structure, equipment or component. 2) no component was upgraded. 3) some components were downgraded from SR to NSR because they do not perform any SR function. These results are recorded in Component Classification Binder #CC-QC007. The CC program is an ongoing controlled program that is under the supervision of Station Engineering.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Loss of Coolant Accident (LOCA) UFSAR 15.6.2 & 15.6.5 Main Steam Line Break (MSLB) UFSAR 15.6.4 Loss of Off Site Power (LOOP) UFSAR 8.3.1.6

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this DCR does not involve any physical changes to plant systems, structures, equipment or components. The safety function of the SW system and its ability to operate is not altered by the drawing or component classification changes. There is no change in any accident scenario analyzed in the UFSAR and no new failure modes or accident scenarios are created.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

This DCR revised the Master Equipment List (MEL) to incorporate the results of DG System Component Classification (CC). These results are recorded in Component Classification Binder #CC-QC004. As part of this DCR, 1) No physical change was made to any plant system, structure, equipment or component, 2) No components were reclassified from NSR to SR, 3) No components were reclassified from SR to NSR. The CC program is an ongoing controlled program that is under the supervision of Station Engineering.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Loss of Off Site Power (LOOP) UFSAR SECTION 8.3.1.6

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this DCR does not involve any physical changes to plant systems, structures, equipment or components. The DG System safety function and its ability to operate remain unchanged. There is no change in any existing accident scenario or malfunction analyzed in the UFSAR and no new accident scenarios or failure modes are introduced.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

This DCR revised the Master Equipment List (MEL) and the selected drawings to incorporate the results of Standby Liquid Control (SBLC) System Component Classification (CC). As part of this DCR, 1) no physical change was made to any system, structure or components. 2) no components were upgraded from NSR to SR. 3) some components were downgraded from SR to NSR because they do not perform any SR function. These results are recorded in Component Classification Binder #CC-QC-011. The CC program is an ongoing controlled program that is under the supervision of Station Engineering.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Anticipated Transient without UFSAR SECTION 15.8 Scram (ATWS)

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this DCR does not involve any physical changes to plant systems, structures, equipment or components. The SBLC system safety function and its ability to operate are unchanged. There is no change in any system functions or accident scenarios that are analyzed in the UFSAR, and no new un-analyzed accident scenarios are created.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

This DCR revised the Master Equipment List (MEL) and the ADS system's drawings to incorporate the results of subject System Component Classification (CC). As part of this DCR, 1) no physical change was made. 2) no components were upgraded or downgraded. These results are recorded in Component Classification Binder # CC-QC043. The CC program is an ongoing controlled program that is under the supervision of Station Engineering.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Loss of Coolant Accident (LOCA) UFSAR SECTION 15.6.5
Main Steamline Break (MSLB) Accident UFSAR SECTION 15.6.4

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this DCR does not involve any physical changes to plant systems, structures, equipment or components. Therefore, the function of the ADS system and its ability to operate are unchanged. There is no change in any existing accident scenarios, and no new accident scenario is created as a result of this DCR.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

This interim procedure tested the Auto-Transfer capability of Bus 22 as a result of a loss of Reserve Auxiliary Transformer 22. The procedure involved manually actuating relay 127YT22X (RAT 22 Undervoltage relay) to simulate an undervoltage condition, resulting in an auto-transfer of Bus 22 to a Unit Auxiliary Transformer 21.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this procedure does not cause systems to operate contrary to their described operation in the UFSAR. This procedure changes only the method by which the initiating undervoltage signal is received by the Bus 22 feed breaker from T22. After receipt of the undervoltage signal, the systems which are affected will operate as designed. No new accidents, transients, or malfunctions of equipment are created by the performance of this procedure.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

SE-93-180 Interim Procedure #400

DESCR. PTION:

This change allowed for Diesel Generator loading up to 110% of the continuous rating of 2500 kW for approximately 2 hours. This equals 2750 kW, which is less than the 2850 kW maximum allowed in the design specifications.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

LOOP (Loss of Offsite Power) UFSAR SECTION 8.3

- The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because loading the DG to 2750 kW for approximately 2 hours is well within the design of the DG, which is rated for 2850 kW for 2000 hours per year. This is being done to "break-in" the new cylinders, which will increase the performance and reliability of the DG. Increasing the DG loading will not have an adverse effect on plant operation. Plant protective relaying, as well as all DG trips, will be functional to trip the DG, if required, regardless of load. As a result, operation of other required plant equipment (i.e. Shutdown cooling equipment) is unaffected by this change.
- 3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because the margin of safety, as required by Tech Specs is not reduced by the increased loading of the U2 DG. The U2 DG is considered inoperable while it is paralleled to offsite power. However, the 1/2 DG, as well as its shutdown cooling pumps, is operable, as required by Tech Specs.

Replaced the fuel pool cooling 1901-10 globe valve with a ball valve. Ball valve to be orientated in the upright position. This design unplugged the drain tap which was plugged due to weld material inside the drain tap line. This also changed some of the vertical and horizontal piping to sloped piping that provides better flow and prevent material clogging in the piping.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the replacement components will perform the same intended function and operation as the original components. There is no change in the intended function or operation of the structure or system. No, new failure will be introduced by the change. Therefore, the change will not create an accident or malfunction different from those evaluated in the UFSAR.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

The purpose of this Exempt Change was to move the 125 VDC control power to relays 159SD1/2 1-2, 159SD1/2 2-3, 159SD1/2X3, 187DG1/2 and 186DG1/2 from Division I 125 VDC at Bus 13-1 to the 125 VDC Control Supply Transfer Switch for the 1/2 Diesel Generator.

Under a condition of a loss of the Unit 1 125 volt dc system, relays 159SD1/2 1-2, 159SD1/2 2-3 and 159 SD1/2X3 will not be capable of being energized and would prevent the 1/2 Diesel Generator from closing in to either Bus 13-1 or 23-1. Since the Unit 1 125 VDC system also provides control power to Bus 24-1, the Unit 2 Diesel Generator would also be prevented from closing on to Bus 24-1. Consequently, if a design basis LOCA/LOOP event were to occur with the single failure of the loss of the Unit 1 125 volt dc system, Unit 2 would be without any Emergency Diesel Generators.

The reason for the change was to ensure the Unit 1/2 Diesel Generator closes its output breaker to Unit 2 with the loss of the Unit 1 125 VDC Bus 1A.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

LOCA/LOOP UFSAR SECTION 15.6.5/15.8.2

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this exempt change has no affect on the operating modes of the plant or on equipment functions. The rewiring of the relays control power to the 125 VDC Control Supply Transfer Switch for the 1/2 Diesel Generator ensures that the 1/2 Diesel Generator will load to Bus 23-1 during a loss of the Unit 1 125 volt dc system. Therefore, the Exempt Change would not create the possibility of an accident or malfunction of a type different from those evaluated in the FSAR/UFSAR.

The work scope will not adversely impact any systems so as to create the possibility of an accident or malfunction of a type different from those evaluated in the FSAR/UFSAR. The work scope involves lifting energized 125 VDC control power leads which is a common practice for the working department. Extra caution will be used when lifting the conductors so as not to short the conductors to other equipment.

This DCR revised the Master Equipment List (MEL) and the DO system drawings to incorporate the results of DO System Component Classification (CC). These results are recorded in Component Classification Binder # CC-QC001. As part of this DCR, 1) no physical change was made to the system, 2) several components were upgraded from non-safety related to safety related because they are relied on to accomplish a safety related function (supply fuel oil to the emergency diesel generator), 3) several components were downgraded from safety related to non-safety related because they do not perform any safety function. These classification changes were evaluated on checklists that were reviewed and approved, and these checklists will become part of the DO system CC Binder. The component classification program is an ongoing controlled program that is supervised by Station Engineering.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Loss of Off Site Power (LOOP) Rebaseline UFSAR Section 8.3.1.6

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this DCR does not involve any physical changes to plant systems, structures, equipment or components. The function of the DO system and its ability to operate remains unchanged. There is no change in any existing accident scenarios or failure modes and no new operating modes or failure modes are introduced.

The DCR revised the MEL and selected drawings to incorporate the results of Component Classification (CC). As part of this DCR, 1) no physical change was made to any plant system, structure, equipment or component. 2) some components were upgraded from NSR to SR because they are relied on to accomplish a SR function (Emergency Core Cooling). 3) some components were downgraded from SR to NSR because they are not required to perform any SR function. These results are recorded in Component Classification Binder CC-QC005. The CC program is an ongoing controlled program that is supervised by station engineering.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Loss of Coolant Accident (LOCA) Rebaseline UFSAR Section 15.6.5

Main Steam Line Break (MSLB) Rebaseline UFSAR Section Accident 15.6.4

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this DCR does not involve any physical changes to plant systems, structures, equipment or components. The Component Classification (CC) process for the RHR system identified the operating mode for each component in the RHR system and also identified that component's role in accomplishing the RHR system safety function. The CC process also considered all applicable accidents analyzed in the UFSAR and all potential equipment

or component malfunctions. The CC process provides assurance that the changes made by this DCR do not affect any existing accidents analyzed in the UFSAR and do not create any new accidents. The RHR system CC process is documented in the RHR system CC binder.

This DCR revised the MEL and selected drawings to incorporate the results of Component Classification (CC). As part of this DCR, 1) no physical change was made to any plant system, structure, equipment or component, 2) Several components were upgraded from NSR to SR because they are relied on to accomplish a SR function. 3) Some components were downgraded from SR to NSR because they do not perform any SR function. These results are recorded in Component Classification Binder #CC-QC002. The CC program is an ongoing program that is supervised by Station Engineering.

SAFETY EVALUATION SUMMARY:

- The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Loss of Coolant Accident (LOCA) Rebaseline UFSAR Section Inside Containment 15.6.5

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this DCR does not involve any physical changes to plant systems, structures, equipment or components, The Component Classification (CC) process for the RR system identified the operating mode for each component in the RR system and also identified that component's role in accomplishing the RR system safety function. The CC process also considered all applicable accidents analyzed in the UFSAR and all potential equipment or component malfunctions. The CC process provides assurance that the changes made by this DCR do not affect any existing accidents analyzed in the UFSAR and do not

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- create any new accidents. The RR system CC process is documented in the RR system CC binder.
- 3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

The proposed Partial Modification was to add all associated piping, piping insulation, supports and the setting of the new NALCO pump skid. This was for a new permanent Dechlorination system to replace the temporary system.

The reason for the change is due to the fact that the temporary De-chlorination system was not capable of winter operation. The station injected Sodium Hypochlorite into the Circulating Water as a biocide to prevent fouling of the condenser. The total residual chlorine/total residual halogen (TRC/TRH) in the station effluent, per the NPDES Permit, must be limited to 0.16 mg/1 as a daily minimum. The Sodium Bisulfite injection system will maintain the NPDES Permit TRC requirements.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

LOCA (Bounding)

UFSAR SECTION 15.6.5

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because there are no systems affected by this Partial Modification other than the non-Safety Related Service Water System. The new system is designed to withstand the same design pressure and temperature of the interfacing system. No new failure modes are introduced by this Partial Modification.

Clarified requirements for sampling and analysis prior to venting the Primary Containment.

SAFETY EVALUATION SUMMARY:

- 1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
 - The change alters the initial conditions used in the UFSAR analysis.
 - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
 - Operation or failure of the changed structure, system, or component could lead to the accident.

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

The possibility for an accident or malfunction of a 2. different type than any previously evaluated in the UFSAR is not created because for accidents evaluated in the UFSAR, no containment venting is analyzed to be required to deal with the containment pressure responses to the accident. Containment venting during normal operation will be in response to expected gas expansion during heatup or loss of drywell cooling transients that do not alter containment activity and therefore cannot impact offsite release rates. This change provides specific direction to the operator so that containment activity can be adequately evaluated prior to the start of venting but does not alter the fact that the release will be monitored continuously and can be terminated if it approaches release rate limitations. Ssince the change does not alter system configuration or use, but simply more clearly defines prerequisites, it cannot create the possibility of an accident or malfunction of a type different from those evaluated in the UFSAR.

3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because the basis for this procedure change is to establish a value that will not result in a trip of the Reactor Building Ventilation System Isolation. That trip setpoint is set conservatively low to comply with this Tech Spec Section. Since this change is still bounded by an automatic plant setpoint that remains unchanged and is derived to prevent exceeding Tech Spec values, the change does not reduce the margin of safety.

Installed fire suppression and detection systems for the Control Room and Service Building HVAC system into the XL-3 Central Monitoring System.

SAFETY EVALUATION SUMMARY:

- 1. The probability of an occurrence or the consequence of an accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR is not increased because fire suppression and detection is not classified as Safety Related in the FSAR. Seismic installation of equipment ensures adequate operation of existing safety equipment and safety related equipment in the immediate area of installation.
- 2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the installation does not interfere with any existing safety systems.
- 3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because suppression and detection is not Safety Related. The reliability of the Fire Protection system is increased by providing this additional suppression and detection.