2.0 LIMITING CONDITIONS FOR OPERATION

2.15 Instrumentation and Control Systems

Applicability

Applies to plant instrumentation systems.

Objective

To delineate the conditions of the plant instrumentation and control systems necessary to assure reactor safety.

Specifications

The operability of the plant instrument and control systems shall be in accordance with Tables 2-2 through 2-5.

(1) In the event the number of channels of a particular system in service falls one below the total number of installed channels, the inoperable channel shall be placed in either the bypassed or tripped condition within one hour if the channel is equipped with a key operated bypass switch, and eight hours if jumpers or blocks must be installed in the control circuitry. The inoperable channel may be bypassed for up to 48 hours from time of initial loss of operability; however, if the inoperability is determined to be the result of malfunctioning RTDs or nuclear detectors supplying signals to the high power level, thermal margin/low pressurizer pressure, and axial power distribution channels, these channels may be bypassed for up to 7 days from time of initial loss of operability. If the inoperable channel is not restored to operable status after the allowable time for bypass, it shall be placed in the tripped position or, in the case of malfunctioning RTDs or linear power nuclear detectors, the reactor shall be placed in hot shutdown within 12 hours. If active maintenance and/or surveillance testing is being performed to return a channel to active service or to establish operability, the channel may be bypassed during the period of active maintenance and/or surveillance testing. This specification applies to the high rate trip-wide range log channel only during plant startup or when the plant is critical and is operating below 15% of rated power. Otherwise, if one high rate trip-wide range log channel becomes inoperable, that channel may be bypassed indefinitely.

(2) In the event the number of channels of a particular system in service falls to the limits given in the column entitled "Minimum Operable Channels", one of the inoperable channels must be placed in the tripped position or low level actuation permissive position

for the auxiliary feedwater system within one hour, if the channel is equipped with a bypass switch, and within eight hours if jumpers or blocks are required. If the channel has not been restored to operable status after 48 hours, the reactor shall be placed in a hot shutdown condition within 12 hours; however, operation can continue without containment ventilation isolation signals available if the containment ventilation isolation valves are closed. If after 24 hours from time of initiating a hot shutdown procedure the inoperable engineered safety features or isolation functions channel has not been restored to operable status, the reactor shall be placed in a cold shutdown condition within 24 hours. This specification applies to the high rate trip-wide range log channel only during plant startup or when the plant is critical and is operating below 15% of rated power.

(3) In the event the number of channels of a particular system in service falls below the limits given in the columns entitled "Minimum Operable Channels" or "Minimum Degree of Redundancy", except as conditioned by the column entitled "Permissible Bypass Conditions", the reactor shall be placed in a hot shutdown condition within 12 hours; however, operation can continue without containment ventilation isolation signals available if the ventilation isolation valves are closed. If minimum conditions for engineered safety features or isolation functions are not met within 24 hours, the reactor shall be placed in a cold shutdown condition within 24 hours. If the number of operable high rate trip-wide range log channels falls below that given in the column entitled "Minimum Operable Channels" in Table 2-2 and reactor startup is in progress or the plant is critical with power operation below 15% of rated power, the plant startup or reactor critical operation should be discontinued and the plant placed in an operational mode allowing repair of the inoperable channels before startup or reactor critical operation may proceed.

If, during power operation, the rod block function of the secondary CEA position indication system and rod block circuit are inoperable for more than 24 hours, or the plant computer PDIL alarm, CEA group deviation alarm and the CEA sequencing function are inoperable for more 48 hours, the CEAs shall be withdrawn and maintained at fully withdrawn and the control rod

drive system mode switch shall be maintained in the off position except when manual motion of CEA Group 4 is required to control axial power distribution.

Basis

During plant operation, the complete instrumentation systems will normally be in service. Reactor safety is provided by the reactor protection system, which automatically initiates appropriate action to prevent exceeding established limits. Safety is not compromised, however, by continuing operation with certain instrumentation channels out of service since provisions were made for this in the plant design. This specification outlines limiting conditions for operation necessary to preserve the effectiveness of the reactor control and protection system when any one or more of the channels are out of service.

All reactor protection and almost all engineered safety feature channels are supplied with sufficient redundancy to provide the capability for channel test at power, except for backup channels such as derived circuits in engineered safeguards control system.

When one of the four channels is taken out of service for maintenance, the protective system logic can be changed to a two-out-of-three coincidence for a reactor trip by bypassing the removed channel. If the bypass is not effected, the out-of-service channel (Power Removed) assumes a tripped condition (except high rate-of-change of power, high power level and high pressurizer pressure),(1) which results in a one-out-of-three channel logic. If in the 2 of 4 logic system of the reactor protective system one channel is bypassed and a second channel manually placed in a tripped condition, the resulting logic is 1 of 2. At rated power, the minimum operable high-power level channels is 3 in order to provide adequate power tilt detection. If only 2 channels are operable, the reactor power level is reduced to 70% rated power which protects the reactor from possibly exceeding design peaking factors due to undetected flux tilts and from exceeding dropped CEA peaking factors.

All engineered safety features are initiated by 2-out-of-4 logic matrices except containment high radiation which operates on a 1-out-of-5 basis.

The engineered safety features system provides a 2 of 4 logic on the signals used to actuate the equipment connected to each of the two emergency diesel generator units.

The rod block system automatically inhibits all CEA motion in the event a Limiting Condition for Operation (LCO) on CEA insertion, CEA deviation, CEA overlap or CEA sequencing is approached. The installation of the rod block system ensures that no single failure in the control element drive control system (other than a dropped CEA) can cause the CEA's to move such that the CEA insertion, deviation, sequencing or overlap limits are exceeded. Accordingly, with the rod block system installed, only the dropped CEA event is considered an AOO and factored into the derivation of the Limiting Safety System Settings and Limiting Conditions for Operation. With the rod block function out-of-service several additional CEA deviation events must be considered as AOO's. Analysis of these incidents indicates that the single CEA withdrawal incident is the most limiting of these events. An analysis of the at-power single CEA withdrawal incident was performed for Fort Calhoun for various initial Group 4 insertions, and it has been concluded that the Limiting Conditions for Operation (LCO) and Limiting Safety System Settings (LSSS) are valid for a Group 4 insertion of less than or equal to 15%.

References

(1) USAR, Section 7.2.7.1

TABLE 2-2

Instrument Operating Requirements for Reactor Protective System

No.	Functional Unit	Minimum Operable Channels	Minimum Degree of Redundancy	Permissible Bypass Condition	Test, Maintenance & Inoperable Bypass
1	Manual (Trip Buttons)	1	None	None	N/A
2	High Power Level	2(b)(c)	1(c)	Thermal Power Input Bypassed Below 10^{-4}% of Rated Power(a)(d)	(e)(f)
3	Thermal Margin/Low Pressurizer Pressure	2(b)	1	Below 10^{-4}% of Rated Power(a)(d)	(e)(f)
4	High Pressurizer Pressure	2(b)	1	None	(e)
5	Low R.C. Flow	2(b)	1	Below 10^{-4}% of Rated Power(a)(d)	(e)
6	Low Steam Generator Water Level	2/Steam Gen(b)	1/Steam Gen	None	(e)
7	Low Steam Generator Pressure	2/Steam Gen(b)	1/Steam Gen	Below 550 psia (a)(d)	(e)
8	Containment High Pressure	2(b)	1	During Leak Test	(e)
9	Axial Power Distribution	2(b)(c)	1(c)	Below 15% of Power	(e)(f)
10	High Rate Trip-Wide Range Log Channels	2(b)	1	Below 10^{-4}% and Above 15% of Rated Power(a)	(g)
11	Loss of Load	2(b)	1	Below 15% of Rated Power	(e)

a Bypass automatically removed.

b If minimum operable channel conditions are reached, one inoperable channel must be placed in the tripped condition within one hour from the time of discovery of loss of operability. The remaining inoperable channel may be bypassed for 48 hours and, if an inoperable channel is not returned to operable status within this time frame, a unit shutdown must be initiated. (See Specification (2) and exception associated with the high rate trip-wide range log channel.)

TABLE 2-2
(Continued)

c If two channels are inoperable, load shall be reduced to 70% or less of rated power.

d For low power physics testing this trip may be bypassed up to 10^{-1}% of rated power.

e If one channel becomes inoperable, that channel may be bypassed for 48 hours. If not returned to operable status within this time frame, the channel must be placed in the tripped condition. (See Specification (1) and associated exceptions.)

f If the inoperable channel is determined to be caused by malfunctioning RTD's or nuclear detectors, the channel may be bypassed for up to 7 days from time of discovery of loss of operability. If not returned to operable status within this time frame, the unit must be placed in hot shutdown within 12 hours.

g One inoperable channel may be bypassed for an unlimited time period.

TABLE 2-3

Instrument Operating Requirements for Engineered Safety Features

No.	Functional Unit	Minimum Operable Channels	Minimum Degree of Redundancy	Permissible Bypass Conditions	Test, Maintenance & Inoperable Bypass
1	Safety Injection				
A	Manual	1	None	None	N/A
B	High Containment Pressure A	2(a)(d)	1	During Leak Test	(f)
	B	2(a)(d)			
C	Pressurizer Low/ Low Pressure A	2(a)(d)	1	Reactor Coolant Pressure Less Than 1700 psia(b)	(f)
	B	2(a)(d)	1		
2	Containment Spray				
A	Manual	1	None	None	N/A
B	High Containment Pressure A	2(a)(c)(d)	1	During Leak Test	(f)
	B	2(a)(d)(d)	1		
C	Pressurizer Low/ Low A	2(a)(c)(d)	1	Reactor Coolant Pressure Less Than 1700 psia(b)	(f)
	B	2(a)(c)(d)	1		
3	Recirculation				
A	Manual	1	None	None	N/A
B	SIRW Tank Low Level A	2(a)(d)	1	None	(f)
	B	2(a)(d)	1		
4	Emergency Off-Site Power Trip				
A	Manual	1(e)	None	None	N/A
B	Emergency Bus Low Voltage (Each Bus)				
	- Loss of Voltage	2(d)	1	Reactor Coolant Temperature Less Than 300°F	(f)
	- Degraded Voltage	2(a)(d)	1		

TABLE 2-3
(Continued)

No.	Functional Unit	Minimum Operable Channels	Minimum Degree of Redundancy	Permissible Bypass Conditions	Test, Maintenance & Inoperable Bypass
5	Auxiliary Feedwater				
A	Manual	1	None	None	N/A
B	Auto. Initiation A B			Operating Modes 3, 4, and 5	
	- Steam Generator Low Level	2(a)(d)	1		(h)
	- Steam Generator Low Pressure	3(a)(g)	1		(i)
	- Steam Generator Differential Pressure	3(a)(g)	1		(i)

a A and B actuation circuits each have 4 channels.

b Auto removal of bypass above 1700 psia.

c Coincident high containment pressure and pressurizer pressure low signals required for initiation of containment spray.

d If minimum operable channel conditions are reached, one inoperable channel must be placed in the tripped condition within eight hours from the time of discovery of loss of operability. The remaining inoperable channel may be bypassed for 48 hours and, if an inoperable channel is not returned to operable status within this time frame, a unit shutdown must be initiated [see Specification (2)].

e Control switch on incoming breaker.

f If one channel becomes inoperable, that channel must be placed in the tripped or bypassed condition within eight hours. If bypassed and that channel is not returned to operable status within 48 hours, that channel must be placed in the tripped condition within eight hours. (See Specification (1) and exception associated with maintenance.)

g Three channels required because bypass or failure results in auxiliary feedwater actuation block in the affected channel.

h If one channel becomes inoperable, that channel must be placed in the actuation or bypassed condition within eight hours. If bypassed and that channel is not returned to operable status within 48 hours, the channel must be placed in the low level actuation permissive condition within eight hours. (See Specification (1) and exception associated with maintenance.)

TABLE 2-3
(Continued)

i If the channel becomes inoperable, that channel must be placed in the bypassed condition within eight hours. If the channel is not returned to operable status within 48 hours, one of the eight channels may continue to be placed in the bypassed condition provided the Plant Review Committee has reviewed and documented the judgment concerning prolonged operation in bypass of the defective channel. The channel shall be returned to operable status no later than during the next cold shutdown. If one of the eight channels is in prolonged bypass and a second channel becomes inoperable, a second channel must be placed in the bypass condition within eight hours. If the second channel is not returned to operable status within seven days from the time of discovery of loss of operability, the unit must be placed in hot shutdown within 12 hours.

TABLE 2-4

Instrument Operation Conditions for Isolation Functions

No.	Functional Unit	Minimum Operable Channels	Minimum Degree of Redundancy	Permissible Bypass Conditions	Test Maintenance & Inoperable Bypass
1.	Containment Isolation				
A	Manual	1	None	None	N/A
B	Containment High Pressure A	2(a)(e)	1	During Leak Test	(f)
	B	2(a)(e)	1		
C	Pressurizer Low/ Low A	2(a)(e)	1	Reactor Coolant Pressure Less Than 1700 psia(b)	
	B	2(a)(e)	1		
2.	Steam Line Isolation				
A	Manual	1	None	None	N/A
B	Steam Generator Low Pressure A	2/Steam Gen(e)	1/Steam Gen	Steam Generator Pressure Less Than 550 psia(c)	(f)
	B	2/Steam Gen(e)	1/Steam Gen		
3.	Ventilation Isolation				
A	Manual	1	None	None	N/A
B	Containment High Radiation A	2(d)	None	If Containment Ventilation Isolation Valves Are Closed	
	B	2(d)			

a A and B circuits each have 4 channels.

b Auto removal of bypass above 1700 psia.

c Auto removal of bypass above 550 psia.

d A and B circuits are both actuated by any one of the five VIAS initiating channels; RM-050, RM-051, RM-060, RM-061, or RM-062; however, only RM-050 and RM-051 are required for containment ventilation isolation.

TABLE 2-4
(Continued)

e If minimum operable channel conditions are reached, one inoperable channel must be placed in the tripped condition within eight hours from the time of discovery of loss of operability. The remaining inoperable channel may be bypassed for 48 hours and, if an inoperable channel is not returned to operable status within this time frame, a unit shutdown must be initiated [see Specification (2)].

f If one channel becomes inoperable, that channel must be placed in the tripped or bypassed condition within eight hours. If bypassed and that channel is not returned to operable status within 48 hours, that channel must be placed in the tripped condition within eight hours. (See Specification (1) and exception associated with maintenance.)

DISCUSSION AND SIGNIFICANT HAZARDS CONSIDERATIONS FOR PROPOSED CHANGES INVOLVING THE BYPASSING OF ALL CHANNELS EXCEPT AUXILIARY FEEDWATER INITIATION CHANNELS

The proposed changes to the Fort Calhoun Station's (FCS) Technical Specifications impose additional limitations on the inoperability of Reacto. Protective System (RPS) and Engineered Safety Features (ESF) instrumentation and initiation channels. The purpose of these changes is to provide additional assurance that the RPS and ESF systems are available to perform intended functions in the event of a plant trip or accident.

The existing FCS Technical Specifications permit a single channel of a RPS or ESF system, employing two-out-of-four logic, to be bypassed indefinitely. A time limit of 48 hours for all channels except those channels which are inoperable due to failure of an RTD or nuclear detector is proposed. This 48-hour time limit is consistent with the intent of the Standard Technical Specifications which have been approved by the Nuclear Regulatory Commission. For those channels which are made inoperable due to a failure of an RTD or nuclear detector, a time limit for permissible bypass has been set at 7 days. The District believes this longer time limit is justified since the failure of these components occurs infrequently and the RPS and ESF systems are designed with sufficient redundancy to ensure proper performance of their intended function with one channel inoperable. Since the repair of a failed RTD or nuclear detector will require the plant to be placed in a hot shutdown condition, the time limit proposed will permit appropriate planning and scheduling. The proposed Technical Specifications also require that if the allowed time limit for bypass is reached and a channel is not returned to an operational condition, the channel must either be placed in a trip condition or the plant must be placed in a hot shutdown condition within the following 12 hours. One exception to this requirement is as follows: If maintenance is actively being performed on the affected channel to restore that channel to operability or its surveillance testing is actively being performed to allow that channel to be restored to operability, the bypass of that channel can be continued past the 48-hour time limit. The District believes a time limit of 12 hours to place the reactor in hot shutdown is satisfactory, since a sufficient amount of system redundancy is still available. The 12-hour time limit is consistent with similar time limits in the FCS Technical Specifications concerning limiting conditions for operation of safeguards equipment.

In keeping with the requirements set forth in the Standard Technical Specifications, the District has proposed a time limit for placing an inoperable channel in the bypassed or tripped condition of one hour from the time of discovery. This one-hour limitation applies only to those channels which can be bypassed by a key switch.

Certain channels of the ESF at the FCS require the installation of jumpers or blocks in order to accomplish a circuit bypass, since the channels are not equipped with key operated bypass switches. Therefore, bypassing these circuits within one hour is not always possible, since properly trained off-duty personnel may have to respond, review drawings and procedures, and obtain necessary approval for installing jumpers or blocks and then accomplish the action to implement the bypass. Experience has demonstrated that an 8-hour period is an appropriate time to accomplish this bypass. When the inoperable channel has been repaired and the jumper or block is removed, testing is performed on that channel to ensure operability. The use of jumpers or blocks to bypass an ESF channel at the FCS is quite infrequent (2 to 3 times per year). Their use is governed by FCS Standing Order O-25, "Electric Jumpers Control". This procedure assures the proper control of jumpers and blocks via the following: (1) requires that a maintenance order for the installation of the jumper or block is properly prepared and authorized; (2) requires that no jumpers or blocks be installed which would violate the FCS Operating License; (3) requires the maintenance of a jumper log which is maintained and controlled by the Shift Supervisor; (4) requires prior Plant Review Committee and Shift Supervisor permission be obtained before installing a jumper or block and that Shift Supervisor permission be obtained prior to removing a jumper or block; (5) requires an independent verification of jumper or block removal; (6) requires a monthly audit of all existing jumpers and blocks by the Supervisor - I&C and Electrical Field Maintenance or his designated alternate; and (7) requires and sets forth a procedure for proper tagging or tag removal of all jumpers and blocks. Each jumper or block requires an individual tag. In addition to Standing Order O-25, it should be noted that jumpers and blocks are not and will not be used for routine surveillance testing of the systems governed by this proposed Technical Specification.

The proposed Technical Specifications also set forth actions to be taken in the event a number of channels of a particular system in service reach or fall below the indicated number of "Minimum Operable Channels", as specified in the existing FCS Technical Specifications. If the number of channels of a particular RPS or ESF system falls to these limits, one of the inoperable channels must be placed in the trip condition within one hour, if the channel is equipped with a switch, and within 8 hours, if jumpers or blocks are required. If the number of channels of a particular system in service falls below the limits given in the columns titled "Minimum Operable Channels" or "Minimum Degree of Redundancy", the reactor shall be placed in a hot shutdown condition within 12 hours. If the minimum conditions are not met within 24 hours, the reactor shall be placed in a cold shutdown within the next 24 hours. This requirement is consistent with those set forth in the Standard Technical Specifications.

As per 10 CFR 50.92, the following significant hazards considerations have been made:

(1) These changes do not involve a significant increase in the probability or consequence of an accident previously evaluated because it establishes specific time limitations on the bypassing of systems which could previously be bypassed indefinitely. The design of the affected systems or the ability of these systems to perform their intended safety functions has not been altered. The only change has been to impose more stringent time limitations for the inoperability of these systems. These more stringent time limitations will not increase the probability or consequence of a previously evaluated accident.

(2) These proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated. As stated above, the only change constitutes an administrative control imposing additional time restrictions upon the inoperability of safety systems and, therefore, will not create a new or different kind of accident.

(3) The proposed changes to the Technical Specifications do not involve a significant reduction in the margin of safety. By imposing more stringent bypass requirements on the RPS and ESF systems and making no changes or alterations in the ability of these systems to perform their intended functions, the margin of safety will not be reduced.

DISCUSSION AND SIGNIFICANT HAZARDS CONSIDERATIONS FOR PROPOSED CHANGES INVOLVING AUXILIARY FEEDWATER INITIATION CHANNEL BYPASS

The steam generator low pressure and steam generator differential pressure channels of the auxiliary feedwater (AFW) automatic initiation circuitry are used to detect and prevent delivery of AFW to a "faulted" steam generator. Upon channel failure, the channel can be placed in a "low level actuation permissive" condition (i.e., if a low level signal occurs, the channel will provide a "feed" signal to the decision matrix) or a "low level actuation prevention" or bypassed condition (i.e., if a low level signal occurs, the channel will provide a "do not feed" signal to the decision matrix). Placing the channel in the "low level actuation prevention" condition provides a two-out-of-three matrix logic for AFW actuation for that steam generator, while placing the channel in the "low level actuation permissive" condition provides a one-out-of-three matrix logic for AFW actuation (both cases assume the presence of valid low level signals). This later case has the possibility of feeding a faulted steam generator with a concurrent single failure to the AFW actuation circuit.

The bypass philosophy chosen by the District is to place one channel of steam generator and/or steam generator differential pressure in the "low level actuation prevention" or bypass condition for a prolonged time period until the next cold shutdown. If a second failure occurs in the 8 channels on either steam generator, the channel must be fixed in 7 days or the unit must be placed in hot shutdown. The essence of this requirement is that the unit is allowed to operate for a prolonged period of time with a two-out-of-three logic for the automatic AFW actuation circuitry of one steam generator and a two-out-of-four logic for the automatic AFW actuation circuitry of the second steam generator. The unit may operate for up to 7 days with a two-out-of-three logic on both steam generators or it may operate for 48 hours in a one-out-of-two mode on one steam generator and two-out-of-four logic on the other steam generator.

The design basis events for the automatic AFW actuation circuitry are the feedline break event, the loss of main feedwater event, and the steamline break event. Each event is discussed with respect to the prolonged bypass of a single steam generator low pressure and steam generator differential pressure channel (i.e., failure of one pressure transmitter).

The feedline break analysis assumes the steam generator blows down in the liquid phase through a hole equivalent to the diameter of the main feedwater line. This event is the most severe loss of heat removal accident analyzed for the FCS. The AFW system is required to provide water to the "intact" steam generator and not to feed the "faulted" steam generator. If the bypassed channel is on

the "intact" steam generator, the actuation logic must work in a two-out-of-three logic to ensure the AFW is actuated to prevent primary system overpressurization for the feedline break analysis. Two additional failures would have to occur such that the AFW system would fail to feed the "intact" steam generator. If the bypassed channel was on the "faulted" steam generator, two additional failures would be necessary such that the AFW system would feed this generator. In both cases, two additional failures are necessary for system failure. In addition, the feeding of a "faulted" steam generator would not invalidate the feedline break analysis. The AFW lines at the FCS enter the steam generators through separate nozzles above the U-tubes and are not connected to the main feedwater lines. The main feedwater line and feed ring are located above the top of the U-tubes. If the AFW system incorrectly feeds the "faulted" steam generator, the water would reach the tube sheath and would exit in the form of steam through the "fractured" main feedwater line. Therefore, heat removal capability would be maintained. Also, the feedline break analysis assumes no credit for any trips associated with the "faulted" steam generator. If credit was taken, a much longer time period would be available for AFW actuation to the "intact" steam generator and the severity of the accident would be greatly reduced.

The AFW actuation circuit must prevent the AFW system from feeding the "faulted" steam generator during the steamline break accident. The actuation circuit would also initiate AFW to the "intact" steam generator, but at a much later time in the accident such that manual actuation could be depended upon. If the bypassed channel is located in the "faulted" steam generator, two additional failures must occur such that the AFW would feed a faulted steam generator which is the same situation that occurs in the case of the two-out-of-four logic. Therefore, no degradation of safety margin occurs with one channel bypassed for the steamline break accident.

The AFW actuation circuit must feed the steam generators in the loss of main feedwater event which may be caused by any number of initiators, including loss of offsite power. However, it is only necessary for the AFW system to feed one steam generator to prevent exceeding any of the specified acceptable fuel design limits which are the acceptance criteria for this event. If AFW is initiated to one steam generator, more than sufficient time exists to manually re-establish feedwater to the other steam generators. Since one steam generator will always have an operable two-out-of-four logic circuit, there is no degradation of safety margin for the loss of main feedwater event.

As per 10 CFR 50.92, the following significant hazards considerations have been made:

(1) These changes do not involve a significant increase in the probability or consequence of an accident previously evaluated because it establishes specific time limitations on the bypassing of systems which could previously be bypassed indefinitely. The design of the affected systems or the ability of these systems to perform their intended safety functions has not been altered. The only change has been to impose more stringent time limitations for the inoperability of these systems. These more stringent time limitations will not increase the probability or consequence of a previously evaluated accident.

(2) These proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated. As stated above, the only change constitutes an administrative control imposing additional time restrictions upon the inoperability of safety systems and, therefore, will not create a new or different kind of accident.

(3) The proposed changes to the Technical Specifications do not involve a significant reduction in the margin of safety. By imposing more stringent bypass requirements on the RPS and ESF systems and making no changes or alterations in the ability of these systems to perform their intended functions, the margin of safety will not be reduced.