

ATTACHMENT 1
PROPOSED CHANGES

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Specification SR 5.3.6 - Instrument Air System
Surveillance

The pressure indicators and low pressure alarms on the instrument air receiver tanks and headers shall be functionally tested monthly and calibrated annually.

Basis for Specification SR 5.3.6

The instrument air system is a normally operating system. Malfunctions in this system will be normally detected by failure of the instrument air compressors to maintain the instrument air receiver tanks at a pressure above the alarm setpoint. Functional tests of the pressure indicators and low pressure alarms on a monthly basis and calibration on an annual basis will assure the actuation of these alarms upon a malfunction of the instrument air system which may compromise the capability of operating critical valves.

Specification SR 5.3.7 - Secondary Coolant Activity
Surveillance

The secondary coolant system will be analyzed for ^{131}I , tritium, and gross beta plus gamma concentration once per week during reactor operation.

| If the secondary coolant activity level reaches 10% of the
| limit of LCD 4.3.8, the frequency of sampling and analysis
shall be increased to a minimum of once each day until the

| activity level decreases to less than 10% of the limit of
| LCO 4.3.8, at which time weekly sampling may be resumed.

Basis for Specification SR 5.3.7

The specification surveillance interval is adequate to monitor the activity of the secondary coolant.

Specification SR 5.3.8 - Hydraulic Snubbers Surveillance

The following surveillance requirements apply to all Class I piping system hydraulic snubbers:

a) Visual Inspections

The first in-service visual inspection of snubbers shall be performed within six months from issuance of this Technical Specification (Amendment 39). For the purpose of entering the schedule described in this section, it shall be assumed that the facility had been on a six-month inspection interval.

ATTACHMENT 2

SIGNIFICANT HAZARDS CONSIDERATIONS

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I. Evaluation

SR 5.3.7

This proposed change would not only decrease the activity level at which increased monitoring would be initiated, but it would also maintain increased monitoring until the activity level decreased to less than that level.

This requirement would also provide for early detection and repair of primary to secondary boundary leakage paths and limit secondary coolant contamination.

Equilibrium value comparisons and variations are considered inconclusive and therefore inconsequential for monitoring normal secondary coolant activity levels. Increased monitoring requirements whenever the activity levels reach or exceed 10% of the required LCO limits is considered more restrictive than the present monitoring requirements and in any event equally adequate to monitor the activity of the secondary coolant.

II. CONCLUSION

Based on the above evaluation, it is concluded that operation of Fort St. Vrain in accordance with the proposed changes will not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) increase the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in any margin of safety.

Therefore, these changes will not increase the risk to the health and safety of the public nor do they involve any significant hazards considerations.