



**CENTERIOR  
ENERGY**

**PERRY NUCLEAR POWER PLANT**

10 CENTER ROAD  
PERRY, OHIO 44081  
(216) 259-3737

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**Michael D. Lyster**  
VICE PRESIDENT - NUCLEAR

March 11, 1992  
PY-CEI/NRR-1458 L

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

Perry Nuclear Power Plant  
Docket No. 50-440  
Annual Report of 10 CFR 50.59  
Safety Evaluations for 1991

Gentlemen:

Attached is our summary report of 10 CFR 50.59 safety evaluations for the period of September 19, 1990 through September 18, 1991, and in selected cases, more recent evaluations. An applicability check using the 10 CFR 50.59(a)(1) threshold criteria was performed on proposed changes to the design of the plant, to procedures/instructions, and to tests. All those meeting threshold criteria were further evaluated pursuant to the 10 CFR 50.59(a)(2) criteria and are summarized herein.

This report summarizes a total of 217 safety evaluations, none of which resulted in the identification of an unreviewed safety question. Safety evaluations are numbered sequentially and those not included in this summary, have either been voided, withdrawn or are still under consideration though not approved at this time. Attachment 1 lists the number of safety evaluations in major categories based on the type of item being evaluated. Attachment 2 defines the acronyms and format description. Attachment 3 provides the summaries of the safety evaluations described above. Attachment 4 provides summaries of four safety evaluations which through administrative oversight were not included in previous reports.

Please feel free to call if you have any questions or comments.

Sincerely,

*Michael D. Lyster*  
Michael D. Lyster

MDL:JEE:ss

Attachments

cc: NRC Project Manager  
NRC Resident Office  
Region III

9203170017 920311  
PDR ADOCK 05000440  
R PDR

Operating Companies:  
Cleveland Electric Illuminating  
Company, Edison

*JEE 7/11*

Summary of  
1991 Perry Safety Evaluations  
by Category

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

<u>Category</u>	<u>Number</u>	<u>Percentage of Total</u>
1. Design Changes (except setpoint changes)	41	19.3
2. Drawing Changes	57	26.1
3. USAR Changes	45	20.2
4. Procedure/Instruction Changes (revisions, temporary changes)	22	10.1
5. Lifted Lead & Jumper, Electrical Devices and Mechanical Foreign Item Changes	12	5.7
6. Nonconformance Report Evaluations	14	6.6
7. Special or Temporary Test Instruction Evaluations	5	2.4
8. Miscellaneous	<u>21</u>	<u>9.6</u>
Total	217	100%



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TEAM 2

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## FORMAT DESCRIPTION

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

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

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

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

### Description of Change:

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

### Summary

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

Attachment 3  
PY-CEI/NRR-1458L

PERRY NUCLEAR POWER PLANT

SAFETY EVALUATION SUMMARY

PURSUANT TO

10 CFR 50.59(b)(2)

1991

SE No.: 85-131

Source Document: DCP 85-288, Rev. 0

Description of Change:

This design change will cap the drain outlets of the Condensate Demineralizer Regeneration Tanks.

Summary:

- I. No. The Condensate Demineralizer regeneration facilities perform no safety function. Therefore, the probability of occurrence or the emergencies of an accident important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The Condensate Demineralizer regeneration facilities are not described in the Technical Specifications or its bases. Therefore, no margin of safety as defined in the bases for Technical Specification will be reduced.

SE No.: 89-156

Source Document: DCP 88-072A, Rev. 0

Description of Change

This design change installs a "Pull-to-Lock" switch in the auto/emergency start circuit of Division 3 Diesel Generator.

Summary:

- I. No. This design change installs a lockout feature in the Division 3 Diesel Generator which will prevent an auto/emergency start of the diesel generator thereby, improving personnel safety. The reliability of the component added by this change is similar to that of the original design. Further the pull-to-lock feature is administratively controlled and is annunciated as "HPCS Out of Service" in the Control Room when the switch is in the "pull-to-lock" position. Hence, this design change does not compromise the redundancy or independence of the safety-related power supplies. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change creates no reduction of system or component performance levels compared to the original design. The physical installation of this switch is in accordance with the original installation requirements. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The reliability of the Division 3 Diesel Generator is not compromised by this design change as described above. Therefore, the margin of safety as defined in the bases of Technical Specification 3/4-8 will not be reduced.



SE No.: 90-164

Source Document: SOI-R43, Rev. 6, TC-7

### Description of Change

This change adds a section to System Operating Instruction (SOI-R43) that installs a jumper to override all Division 1(2) Diesel Generator (DG) trips except diesel overspeed and generator differential current. This is not a normal evolution and will not be performed unless the DG is required to be kept in service to avoid a situation similar to the Vogtle event.

### Summary

- I. No. In the event that a Standby Diesel Generator should trip due to a false indication during a Loss of Offsite Power (LOOP) event or other plant upset condition, the Shift Supervisor may authorize the overriding of non-essential trips. This will effectively place the engine into a LOCA run logic scenario where non-essential trips are alarmed but do not cause an engine trip to occur.

The installation of this jumper results in an electric circuit configuration functionally identical to the configuration utilized during LOCA conditions. The response of the Division 1 and 2 DGs to accident conditions remains unchanged.

This change creates no cross-ties between safety-related divisional power supplies or interconnections between Divisional Diesel Generators. The response of the DGs and the onsite power supply to plant accident conditions evaluated previously is not affected by this change since function, performance, and redundancy have not been compromised. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.

- II. No. See Item I above.

- III. No. This change does not adversely affect the reliability of the onsite power supply as defined in the bases of Technical Specifications 3/4-8. Therefore, the margin of safety as defined in the bases for any Technical Specification has not been reduced.

SE No.: 90-165

Source Document: SOI-R45, Rev. 5, TC-6

Description of Change

This change adds a section to System Operating Instruction (SOI-R45) that allows continuous operation of the Division 1, 2, and 3 Diesel Generator (DG) Fuel Oil Transfer Pumps (R45) for the purpose of adding chemicals to the storage tanks.

Summary

- I. No. This change installs a temporary jumper into the Fuel Oil Transfer System control circuits to permit continuous Fuel Oil Transfer Pump operation. Continuous operation of a Fuel Oil Transfer Pump will result in day tank levels above the top of the day tank to the elevation of the overflow line. Operation of a DG with day tank level at overflow has no effect on the performance or reliability of the DG. The jumper installation is governed by procedure GEI-0007 which ensures that installation will not compromise the qualification or integrity of the original installation, as it conforms to the same codes/standards as were used in the original installation. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety is not increased.
- II. No. The response of DGs and the onsite power supply to plant accident conditions evaluated previously is not affected by this change since function, performance, and redundancy have not been compromised. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This change does not adversely affect the reliability of the onsite power supply. Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.

SE No.: 90-166

Source Document: DCN 3203, Rev. 0

Description of Change

This drawing change makes an editorial change to P&ID 302-111, High Pressure Heater Drains and Vents, to reflect the as-built configuration of the control air line to 1N25-R0300A.

Summary

- I. No. This change updates P&ID 302-111 to depict the actual in-plant configuration. The change to this drawing simply adds a control air signal line to 1N25-R0300A. All valves controlled will still fail in the previously evaluated position on loss of control air. This control signal has been evaluated previously as nonsafety-related and this is not changed due to this DCN. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. Since the system operability has not changed, the margin of safety defined in the bases of the Technical Specifications has not been changed or reduced.

SE No.: 90-168

Source Document: USAR CR 90-068

Description of Change

This evaluation analyzes a change to USAR Section 11.2.2.14 to delete the requirement to periodically test radwaste equipment.

Summary

- I. No. The radwaste filters, demineralizers, and evaporators are continually monitored to ensure performance is acceptable to meeting established design codes and standards and can meet required operating parameters. The Radwaste System still complies with 10CFR20.106, 10CFR50 Appendix I, Reg. Guide 1.143 and NUREG-0800 since no credit is taken for performance testing. Design and operational testing associated with these documents is fulfilled by the daily analyses required by PAP-1102, "Plant Chemistry Control Program". Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. NO. As stated above the design and operational testing requirements associated with this equipment are fulfilled by the analyses performed on a daily basis under PAP-1102. If these analyses do not satisfy the acceptance criteria, corrective action is taken. As a result of the daily assessment, performance testing is not required. essentially it is performed daily. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. NO. No Technical Specifications describe this performance testing. Therefore, no margin of safety will be reduced.

SE No.: 90-169

Source Document: DCP 90-108, Rev. 0

### Description of Change

This design change will permanently deactivate the source voltage supervision relays at the preferred and alternate preferred source breakers on Class 1E Buses EH11, EH12, and EH13. (Reference NR 90-S-022)

### Summary

- I. No. These relays are used as a "voltage supervision" interlock in the manual control circuits used to connect a de-energized EH11, EH12, or EH13 bus to the preferred or alternate preferred source breakers. The operators are presently performing the "voltage supervision" function by reviewing the availability of source voltage via available indicating lights and/or voltmeters. Administrative controls are in place which describe the use of the lights, voltmeters, etc. for manually operating the EH bus source breakers and diesel generator synchronization operations.  
  
Deactivation of these EH bus relays will not impact the automatic responses of the EH bus source breakers and diesel generators to a Loss of Offsite Power (LOOP) incident. Should a LOOP occur, the EH buses will be automatically connected to the diesel generators with the existing undervoltage detection logic which is unaffected by this design change. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety is not increased.
- II. No. LOOP analysis as described in the USAR is unaffected by this design change. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Technical Specifications requires two physically independent circuits between the offsite transmission network and the Class 1E distribution system be operable. This design change will not eliminate the availability or impact the operability of either source supply. Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.

SE No.: 90-170

Source Document: DCN 3213, Rev. 0

Description of Change

This drawing change makes an editorial change to P&ID 302-104, Condensate Filtration System, to indicate the correct order of the isolation valves for Condensate Filtration sample trough.

Summary

- I. No. This drawing change is editorial and does not impact any plant safety feature or system, nor does it have any effect on other systems that provide such functions. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This drawing change is editorial only. Hence, the possibility for an accident or malfunction of a different type than any evaluated previously in the USAR is not created.
- III. No. The drawing change only clarifies the isolation valve numbering. Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.

SE No.: 90-171

Source Document: FTI-D06, Rev. 1, TC-8

Description of Change

This change modifies Fuel Technical Instruction (FTI-D06) to allow for additional configurations to be analyzed for passing shutdown margin criteria based on the actual core shuffle plan.

Summary

- I. No. The 1% dK/K design margin for cold shutdown is maintained with the strongest rod withdrawn. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. Normal refuel operations are performed. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Shutdown margin of 0.38% dK/K is maintained with the strongest worth rod analytically determined in Operational Conditions 1, 2, 3, 4 and 5. Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.

SE No.: 90-172

Source Document: NR 90-S-123, Rev. 0

Description of Change

This evaluation analyzes the rework and temporary use-as-is disposition of Emergency Closed Cooling System Flow Element 2P42-N0040B. It allows the temporary use of a potentially non-ASME Class 3 spacer ring in place of the originally designed flow element orifice plate.

Summary

- I. No. As the spacer ring may not be certified to ASME Class 3 standards it must be assumed that it has the potential for complete failure. Three concerns were postulated (minimization of wall thickness, gross failure, and flooding) and analyzed. The results are detailed in calculations P42-16 Rev. 0, P42-17, Rev. 0, and GC #JL-83. These calculations indicate that ring failure would not create any adverse plant conditions. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The function of the system is not affected by the temporary use of the spacer ring. Any failure of the spacer ring to maintain it's pressure boundary will not prevent the safety systems from functioning and does not create an unanalyzed flooding concern. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The temporary use of the spacer ring will not affect flow rates to the required safety-related equipment and it will not adversely effect the operation of any equipment. Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.



SE No.: 90-173

Source Document: DCP 90-219, Rev. 0

### Description of Change

This design change adds a 4-inch isolation valve on Nuclear Closed Cooling (P43) System piping to eliminate the use of freeze seals when a section of piping is removed. The change also modifies a small spring can support.

### Summary

- I. No. The added valve is located in the "B" Recirc Pump P43 cooling water return line. Low flow alarms are present on all P43 return lines out of the recirc pumps to indicate system blockage, leakage or valve misalignment. IOI-1, "Cold Startup", requires verification of P43 cooling water flow to the recirc pumps prior to Drywell closeout. The gate valve will improve present P43 System isolation capabilities. The P43 System is not safety-related (except for valves and piping associated with containment isolation, control room chillers, and fuel pool heat exchangers) and is not required for safe shutdown. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. During normal system operation the valve will be open and thus system operation remains unaffected. If needed (during outages) for isolation, this valve will eliminate the need for installation of less reliable freeze seals. Therefore, the possibility for an accident or malfunction of a different type than previously evaluated in the USAR is not created.
- III. No. This change does not affect any P43 containment isolation valves and has no effect on system/plant operation. Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.

SE No.: 90-174

Source Document: OM16F Physical Security Plan, Rev. 15

Description of Change

Revision 15 of OM16F, Physical Security Plan, has been evaluated to ensure that the effectiveness of the Perry Nuclear Power Plant Security Plan has not been reduced and to ensure that the requirements of 10 CFR 73, Physical Protection of Plants and Materials, are met. Site Protection must be contacted for further details since this is considered "SAFEGUARDS" information.

Summary

- I. No. OM16F describes the comprehensive Physical Security Program and therefore, does not affect the occurrence or consequences of an accident or malfunction of equipment.
- II. No. OM16F does not direct the operation of plant systems or equipment and, therefore, does not create the possibility for an accident or malfunction.
- III. No. OM16F does not reduce the margin of safety as defined in the bases for any Technical Specifications.

SE No.: 90-175

Source Document: USAR CR 90-098

Description of Change

This evaluation analyzes revising the Standby Diesel Generator (DG) fuel oil properties and methods of testing.

Summary

- I. No. The new fuel oil remains in conformance with Reg. Guide 1.137 and the various ASTM Standards associated with fuel oil. The testing of the fuel oil is consistent with the ANSI and ASTM standards associated with fuel oils. The use of fuel oil with different properties, therefore, does not impact the design, function, or performance of the DG. Hence, the probability of occurrence or the consequences of an accident or malfunction previously evaluated is not increased.
- II. No. The new fuel does not adversely affect any plant equipment. The design or function of the DG has not been impacted. Therefore, the possibility of creating an accident or malfunction of a type different than evaluated does not exist.
- III. No. The new fuel does not impact the design, function, or performance of the DG. Hence, the reliability of the onsite power supplies in accordance with Technical Specification 3/4.8 has not been impacted. Therefore, no margin of safety has been reduced.

SE No.: 90-176

Source Document: DCN 3266, Rev. 0  
USAR CR 90-099

### Description of Change

This evaluation analyzes the incorporation of test spacers 1E12-D015A/B into USAR Tables 6.2.33 and 6.2.40. (Reference DCP 89-224 and SE 90-054)

### Summary

- I. No. This change revises the USAR tables to agree with DCP 89-224 which added the test spacers. The test spacers were evaluated and approved for incorporation via Safety Evaluation 90-054. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change does not affect any equipment in the plant. It only shows the type of test required on the bonnet bleed off line flanges for 1E12-F055A/B using the spacer fabricated under DCP 89-224. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the JSAR does not exist.
- III. No. The change permits the 1E12-F055A/B bonnet vent flanges to be tested utilizing the test spacers 1E12-D015A/B which satisfies the requirements of Technical Specifications 3.6.1.2 and 4.6.1.1.1.A. Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.

SE No.: 90-177

Source Document: FTI-E04, Rev. 0, TC-5

### Description of Change

This change modifies Fuel Technical Instruction (FTI-E04) to permit utilization of an underwater television system to verify engagement/disengagement of the fuel support piece grapple. The normal method for verification is via indicating lights that are mounted on the grapple.

### Summary

- I. No. Remote visual observation via an underwater television system will verify proper operation of the fuel support grapple. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change does not change the equipment used to remove fuel support pieces. It provides an alternate method for verification. This method is as reliable as existing methods. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Fuel support piece grapple indicating lights are not covered by Technical Specifications. Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.

SE No.: 90-178

Source Document: DCN 3236, Rev. 0

Description of Change

This drawing change incorporates on various P&IDs the as-built information associated with the extension of the plant security system to include Unit 2.

Summary

- I. No. This work was completed under specification #SP-1008, and field installed under DCP 89-138. Individual drawing changes were not part of the DCP. The associated changes to the security plan were addressed by plant security under separate cover. The NRC is aware of this project. This nonsafety activity will not affect the probability of occurrence or the consequences of an accident or malfunction previously evaluated in the USAR.
- II. No. This change to the nonsafety security system does not impact any other systems. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The security system is not addressed in the Technical Specifications. The equipment is nonsafety and has no affect on other systems. Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.

SE No.: 90-179

Source Document: DCP 90-130, Rev. 0

### Description of Change

This design change replaces the smoke detector in the control room kitchen with a heat detector. This replacement will reduce the false alarms occurring as a result of cooking fumes being generated in the kitchen.

### Summary

- I. No. This changes will increase reliability of the fire detection system in the event of a fire and will not otherwise effect system function in response to a fire. This component does not affect or directly impact any systems or structures important to safety, nor is it involved in the initiation or mitigation of any accident. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change merely involves the change-out of one type of fire detector for another more suitable type of detector. The change will maintain the fire detection system configuration in compliance with USAR commitments. Therefore, the possibility of an accident or malfunction of a different type than evaluated in the USAR is not created.
- III. No. This change has no impact on the administrative aspects of the Fire Protection Program and does not affect any plant system relied on for Alternate Shutdown capability. Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.

SE No.: 90-180

Source Document: Delaval Vendor Manual Revision Notice, MRN 4

Description of Change

This evaluation analyzes revisions made to the maintenance schedule recommendations generated by the TDI Diesel Generator Owners Group Design Review and Quality Revalidation (DR/QR) Report.

Summary

- I. No. These changes are limited to maintenance practices on the standby diesel generators. Overall, the changes will not adversely impact the reliability, redundancy, or function of the diesel generators. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated in the USAR has not increased.
- II. No. These changes do not impact the reliability, redundancy, or function of the standby diesel generator or the onsite power supplies. No new design has been introduced nor has any safety factor been reduced. Therefore, the possibility for creating an accident or malfunction of a different type than any evaluated previously does not exist.
- III. No. The reliability of the onsite power supply has not being changed. Therefore, margin of safety in the bases of the Technical Specification 3/4-8 has not changed.



SE No.: 90-181

Source Document: NR 90-N-153, Rev. 0

Description of Change

This evaluation analyzes the use-as-is disposition of the main transformer bus duct support anchor bolts being in an ungrouted condition.

Summary

- I. No. The isophase bus ducts, cable trays and their supports remain adequate and functional in the ungrouted condition as determined calculation F.C. #18:02. This equipment is nonsafety and is not relied upon to mitigate the consequences of any accidents evaluated in the USAR. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The isophase ducts, cable trays and supports are acceptable with the ungrouted condition of the base plates. Further, these components are nonsafety and are not relied upon for accident mitigation. Therefore, the margin of safety as defined in the bases for any Technical Specification is not reduced.

SE No.: 90-182

Source Document: DCF 90-232, Rev. 0

Description of Change:

This design change installs an easy-to-remove drain line from the Drywell cooler. The current configuration has the drain line welded in place. Threaded unions will be used instead of welds. Further, a small globe valve is being replaced with a ball valve with threaded ends to facilitate removal. A lateral clean out is also being provided.

Summary

- I. No. The portion of the drain line being modified is a nonsafety line. The modification allows periodic removal of the piping for inspection for dirt build-up. This will actually increase the reliability of the system to function as designed. This line is not relied upon during accident conditions. Therefore, the probability of occurrence or the consequence of an accident or malfunction of equipment important to safety is not increased.
- II. No. The ball valve being utilized in the design is of the same pressure class. The difference in the materials between the globe valve (carbon) and the ball valve (stainless) was shown not to cause any problems due to dissimilar metals. The modified line will perform as originally designed. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This line is nonsafety and not addressed in the Technical Specifications. Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.

SE No.: 90-183

Source Document: DCP 88-072C, Rev. 0

Description of Change

This design change replaces the resistor and capacitor relay coil in the High Pressure Core Spray (HPCS) Diesel Generator Engine Control Circuits with Varistor Suppressors to reduce voltage surge when the relays are de-energized.

Summary

- I. No. The installation of Varistor Suppressors to reduce high voltage surges has been successfully tested. The installation will reduce the transient noise to an acceptable value and protect equipment susceptible to high voltage surges. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The physical installation of the components and associated wiring is in accordance with the original installation requirements. This change creates no reductions of redundancy or component performance levels compared to the original design. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Reliability of the HPCS Diesel Generator is not compromised by this change. Therefore, the margin of safety described in the Technical Specification bases is not affected.

SE No.: 90-184

Source Document: SCR 1-90-1637 through 1640

Description of Change:

This evaluation analyzes the revision of the turbine first stage pressure bypass setpoints and allowable values.

Summary:

- I. No. The existing values were based on turbine thermal heat balance calculations. Testing has determined that these values are overly conservative. The design basis that the turbine valve closure scrams should be bypassed below the turbine first stage pressure equivalent to 40% of Rated Thermal Power (RTP) remains unchanged. The proposed setpoints and allowable values would be depicted in terms of actual turbine first stage pressure, rather than as a percentage of turbine control valve position. Pressure is a more accurate measure of RTP. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The purpose of this change will establish when a turbine trip will cause an anticipatory reactor trip, and an end-of-life recirculation pump trip as described in the USAR. The proposed setpoints provide additional margin against inadvertent scrams at low power, while still providing for initiation of the turbine stop and control valve closure anticipatory reactor scram and the end-of-cycle recirculation pump trip functions. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This change is consistent with the Technical Specification modification as described in Operating License Amendment 29. As described above, no margin of safety is reduced.

SE No.: 90-185

Source Document: DCP 89-189, Rev. 1

### Description of Change

This design change alters the air distribution at the 647'-6" elevation of the Turbine Power Complex. The air distribution will be modified by adding a branch of ductwork and rebalancing. However, a revision to DCP 89-189, Rev. 0, Safety Evaluation 90-037, was required to accept the as-built condition of the added supply air because one of the registers of the added supply duct could not be balanced to within ten percent of design.

### Summary

- I. No. This design change will improve air distribution at the 647'-6" elevation of the Turbine Power Complex. The design change will not adversely impact the function of the Turbine Power Complex Ventilation (M42) System. The ambient temperature in these areas will remain within the range specified in the USAR. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. Technical Specifications does not address the Turbine Power Complex Ventilation (M42) System. The design change does not affect the function of the M42 System. Therefore, no margin of safety as defined in the bases for any Technical Specification will be reduced.

SE No.: 90-186

Source Document: DCN 3214, Rev. 0

Description of Change

This drawing change makes an editorial change to P&ID 302-606, Nuclear Boiler System, to reflect the as-built condition.

Summary

- I. No. This change updates P&ID 302-600 to depict the actual in-plant configuration. The isolation of these instruments does not alter the overall function of the system. The instruments were only used for local indication. Therefore, the probability of occurrence of an accident or malfunction of equipment previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. Since the system operability has not changed, the margin of safety defined in the bases of the Technical Specifications has not been reduced.

SE No.: 90-188

Source Document: PTI-M41-P0002, Rev. 0

### Description of Change

This change modifies the Periodic Test Instruction of the Heater Bay Ventilation System (PTI-M41-P0002) to permit the shutdown of both Heater Bay (M41) supply fans during Operation Conditions 4 and 5 for the purpose of performing maintenance in the location of the supply fans.

### Summary

- I. No. With the supply fans shutdown the airflow paths as tested and designed will not change airflow from areas of low potential radioactivity levels to areas of high potential radioactivity levels. The Heater Bay will go to a slightly more negative pressure in relationship to the outside which will enhance correct airflow paths and directions. In this operating configuration at least one M41 exhaust fan will be operating which will permit the radiation monitoring system to function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The M41 System configuration described will be limited to Operational Conditions 4 and 5. Further, the system is nonsafety and not required for safe shutdown of the plant. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. With the M41 exhaust fans in service per this configuration, the radiation monitoring system will function as required per Technical Specifications. Therefore, the margin of safety as defined in bases for Technical Specifications will not be reduced.

SE No.: 90-189

Source Document: DCP 90-240, Rev. 0

Description of Change

This design change removes broken or missing ASME turbine acceptance test lines within the low pressure, intermediate, and high pressure condensers. These lines are not being used and will be plugged to reduce the potential for condenser in-leakage.

Summary

- I. No. This design change removes and plugs the ASME turbine acceptance testing lines associated with the Main Turbine. These lines have no function during normal operation. Further, these lines will not impact any Engineered Safety Feature system (ESF) or system required for safe shutdown. Removal of these lines reduces the potential for condenser in-leakage thereby improving the integrity of the Condensate System. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The design intent of these test lines is for diagnostic purposes only. No ESF or shutdown system has been affected. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. These test lines are not described within the Technical Specifications. No ESF or safe shutdown system has been affected. The integrity of the Main Steam and Condensate Systems has been improved. Hence, no margins of safety as defined in the bases for any Technical Specification will be reduced.



SE No.: 90-190

Source Document: SCR 1-90-1708 through 1710

Description of Change

This evaluation analyzes various setpoint changes made to the Division 3 Diesel Generator (DG) Fuel Oil System day tank level switches.

Summary

- I. No. The setpoint changes made do not physically alter any installed equipment nor do they adversely effect DG function or reliability. DG day tank level operating margins have not been impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction not previously evaluated in the USAR is not increased.
- II. No. The setpoint changes do not adversely effect the DG control system. DG function and response have not been impacted. Day tank level operating margins have been maintained. The performance and function of the original design have been maintained. Therefore, the possibility of creating an accident or malfunction of equipment or a different type than evaluated does not exist.
- II. No. The setpoint changes do not adversely effect the function or operation of the DG. As such, Technical Specification 3/4-8 dealing with the onsite power supplies has not been impacted. Therefore, no margin of safety as described in the basis for Technical Specifications is reduced.

ption of Change:

This evaluation analyzes plant power operation with eleven shroud head stud bolts removed from the shroud head/separator assembly.

Summary

- I. No. The shroud head and the shroud head studs with associated hardware are nonsafety-related components. There is no impact upon Reactor Pressure Vessel (RPV) integrity. Analyses conducted by GE state that there will be no leakage from the shroud head flange. Further, the probability of IGSSC has not been affected. The potential for loose parts has been reduced due to the removal of the bolts. Therefore, the probability of the occurrence or the consequences associated with an accident or malfunction of equipment previously evaluated is not increased.
- II. No. As stated above RPV or shroud structural integrity have not been reduced. Therefore, the possibility for creating an accident or malfunction of a type different than previously evaluated does not exist.
- III. No. RPV integrity has not been impacted. The potential for loose parts has been reduced. The probability for D.SSC has not changed. Therefore, no margin of safety as described in the basis of Technical Specifications is reduced.

Description of Change

This evaluation analyzes the shutdown of the Heater Bay Ventilation (M41) System during plant Operational Conditions 4 and 5 for the purpose of maintenance in the area of the supply fans. The Steam Tunnel Cooling (M47) System and the Turbine Ventilation (M35) System will also need to be shutdown to perform this activity.

Summary

- I. No. With the M41 supply fans shutdown, the airflow paths as tested and designed will not change airflow from areas of low potential radioactivity levels to areas of high potential radioactivity levels. The Heater Bay will go to a slightly more negative pressure in relationship to the outside which will enhance correct airflow paths and directions. This operating mode will shutdown the M41 supply fans but will still operate at least one M41 exhaust fan which will permit the radiation monitoring system to function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The system operational change described will be limited to Operational Conditions 4 and 5. Additionally, the M41 System is nonsafety and not required for safe shutdown of the plant. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. With the M41 exhaust fans in service per this mode the radiation monitoring system will function as required per Technical Specifications. Therefore, no margin of safety as defined in the bases for Technical Specification will be reduced.

SE No.: 90-193

Source Document: SOI-F11/15, Rev. 4, TC-8

### Description of Change

This change adds a section to System Operation Instruction (SOI-F11/15) which installs a jumper to defeat the Refueling Platform Bridge Reverse Motion Interlock Number Two. The purpose is to allow travel over the reactor vessel in modes such as hot shutdown, cold shutdown, and power operation.

### Summary

- I. No. This change will not affect the refueling bridge's capability of preventing an inadvertent criticality during refueling operations. Additionally, the jumper installed by this procedure has no impact on any bridge component that could change the probability of dropping a fuel bundle during fuel movement. No equipment important to safety has been affected. Administrative controls exist which ensure that should the Reverse Motion Interlock Two be required for plant operations it is available. Therefore, the probability of occurrence or the consequences of an accident or malfunction or equipment important to safety has not increased.
- II. No. See Item I above.
- III. No. The Reverse Motion Interlock Two is not associated with the core alterations interlocks described in Technical Specifications. No systems important to safety have been affected. Therefore, the margin of safety as defined in the basis for any Technical Specification is not reduced.

SE No.: 90-194

Source Document: FCR 14465

### Description of Change

This evaluation analyzes the temporary installation of a nitrogen freeze seal in the Hydraulic Control Unit (HCU) Drive Water line to isolate valve EP101 for disassembly and maintenance.

### Summary

- I. No. This evolution is performed during Mode 5 with no fuel movement. Two independent safety-related systems will be available to supply low pressure makeup water in case of a loss of water inventory due to possible seal failure. Since the reactor is cooled, depressurized and the plant shutdown with make up available, the consequences of a leak caused by freeze seal failure is bounded by existing analyses. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluate in the USAR is not increased.
- II. No. The water from the postulated leak will drain into the Suppression Pool. The systems which supply make up to the vessel take suction from the Suppression Pool. Equipment important to safety located within the containment are qualified for containment spray operation. Electrical connections to the HCU's are sealed. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. By requiring two independent safety-related systems to be able to supply makeup water to the reactor vessel, Technical Specification 4.5.2 is satisfied for operations having a potential for draining the reactor vessel. Technical Specifications 3/4.5.1 and 3/4.5.2 are satisfied with respect to the sources of emergency core cooling after the reactor vessel is depressurized and a source for flooding of the core in case of accidental draining. Therefore, the margin of safety as defined in the bases for any Technical Specification is not reduced.

SE No.: 90-195

Source Document: NR 90-N-245, Rev. 0

### Description of Change

This evaluation analyzes the use-as-is disposition of not replacing a broken piece of removable radiation shielding for penetration 1PRB2503 (Reactor Recirculation Suction Piping-Bioshield Wall).

### Summary

- I. No. This use-as-is disposition creates a small void within the layers of neutron shielding. Calculations verify that the void is insignificant. The original shielding design indicates that a void would not have a significant impact on the shield's ability to protect components from neutron exposure. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This disposition is bounded by the original shielding design. There is no impact upon the operation of any plant component. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The change in the shield's ability to shield neutrons has been determined to be statistically insignificant. Therefore, it does not represent a reduction in the margin of safety as defined in the bases for Technical Specifications.

SE No.: 90-196

Source Document: DCP 90-028, Rev. 0

### Description of Change

This design change replaces the ASCO dual coil solenoid valves with two ASCO single coil solenoid valves on the outboard Main Steam Isolation Valves (MSIV) in order to correct the sticking problem related to the dual coil solenoid.

### Summary

- I. No. This change does not alter the MSIV trip logic as described in USAR Section 7.3.1.1.2. Further, the change does not impact the safety-related air system which supplies motive force for valve closures. The new solenoids and associated tubing are fully environmentally and seismically qualified for this application. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated is not increased.
- II. No. As stated above this change does not alter the MSIV trip logic or the motive force (air). The new components and tubing are fully environmentally and seismically qualified. Further, the new components will reduce the probability of failure by lowering the expected valve temperature rise and eliminating the seizing force associated with the "B" solenoid of the dual coil solenoid. Therefore, the possibility of creating an accident or malfunction of different type than any evaluated previously does not exist.
- III. No. Technical Specification 3/4.4.7 states that the operating time for MSIVs is a minimum of three (3) seconds and a maximum of five (5) seconds. Automatic Switch Company (ASCO) submitted test data indicates that the two (2) ASCO single coil control valve assembly is slightly faster than the ASCO dual coil solenoid control valve by 0.5 seconds. Therefore, the maximum time of five (5) seconds will still be achievable. A review of past MSIV time response data indicates that sufficient adjustment is available to compensate for the slight increase in pilot operating time. Hence, the minimum operating time is also achievable. Therefore, no margin of safety as described in the basis for Technical Specifications is reduced.

SE No.: 90-197

Source Document: NR 90-S-277, Rev. 0

### Description of Change

This evaluation analyzes the interim use-as-is disposition of the Feedwater Loop "B" piping/RPV Nozzle, during plant Operational Condition 5. This is due to a reported feedwater nozzle indication which is beyond the inspection allowable size limits of the ASME code.

### Summary

- I. No. The interim disposition restricts the reactor pressure vessel to static pressure. The resulting pressure stresses are insignificant during Operational Condition 5. Further, there are no sustained loads of significant magnitude during this condition. These conditions are required for crack growth. However, these conditions will not exist during this mode of operation. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. Technical Specification 3/4.4.8 is not violated by this interim disposition. Therefore, no margin of safety as defined in the bases for any Technical Specification is reduced.



SE No.: 90-198, 90-208

Source Document: DCP 90-225, Rev. 0  
DCP 90-225A, Rev. 0

### Description of Change

This design change replaces the second stage pump impeller on the Emergency Service Water (ESW) Pump 1P45-C001B with a larger size impeller. The use of a larger impeller will provide additional head and additional reserve flow for the ESW (P45) System.

### Summary

- I. No. This change does not affect the function or integrity of the ESW System. The design, fabrication, and installation of the modification meets or exceeds the standards/requirements of the original design. The prime mover of the pump has sufficient horsepower to drive the pump. The ESW piping is designed to withstand a higher pressure than the modified pump can deliver. Hence, overpressurization of the piping is not possible. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. This modification is within the original design envelope of the ESW pump. The function of the pump has not been altered. Analysis has shown that the creation of missiles due to the new impeller is of no concern. As stated above system overpressurization is also of no concern. Hence, the possibility of creating an accident or malfunction of a different type than any previously evaluated does not exist.
- III. No. This modification does not adversely affect the design function or integrity of the ESW System. Therefore, no margin of safety as defined in the bases for any Technical Specification is reduced.

SE No.: 90-199

Source Document: PTI-GEN-P0015, Rev. 1, TC-2

### Description of Change

This change updates Periodic Test Instruction for the testing of emergency core cooling system header drain valve seats (PTI-GEN-P0015) to incorporate the definition of the term "systems are operating". This update will eliminate conflicts between the prerequisites of the instruction and with USAR Appendix 1A, Item III. D.1.1.

### Summary

- I. No. In accordance with ASME code, Section XI, Subparagraph IWV-3423(e), seat leakage can be measured at a lower value than the function maximum pressure differential. The observed leakage shall be adjusted to the function maximum pressure differential using the ratio between test and function pressure differential. Test pressure at standby readiness conditions (pump not dead-headed with elevation correction) is ~ 45 psig. Pump running maximum function pressure (throttled flow with elevation correction) is ~ 165 psig. These conditions produce a worse case correction factor of 1.92.

This instruction uses a correction factor of 2 which adds conservatism. This change complies with the USAR since leakage past boundary valves is collected and compare to an overall water leakage limit. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.

- II. No. See Item I above.
- III. No. This instruction change does not effect any safety margin identified within Technical Specification Section 2.0. Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.

SE No.: 90-200

Source Document: SXI-049, Rev. 0

### Description of Change

This evaluation analyzes a feedwater pump runout capability test being performed as a retest for Reactor Feedwater Pump Turbines (RFPT) A&B. The test is required because of a diffuser replacement in each pump.

### Summary

- I. No. The test verifies the feedwater runout flow and makes the necessary adjustments to the RFPT high speed stops to ensure that the maximum feedwater runout does not exceed 143% (NBR). Until the verification is completed and the high speed stops are adjusted there will only be one RFPT on the Master Level Controller. This ensures that the plant remains within the analyses described in USAR Section 15.1.2. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. All Technical Specification changes using the 143% feedwater runout flow were incorporated in Amendment 20 of the Technical Specifications. This test will ensure that the 143% feedwater runout flow will not be exceeded. Since runout flow will not exceed 143%, all accidents/transients will remain bounded by those previously evaluated. Therefore, no margin of safety as defined in the bases for any Technical Specification is reduced.

SE No.: 90-201

Source Document: PAP-1922, Rev. 1, TC-1

Description of Change

This change updates PAP-1922, "Preparation, Review, and Approval of Pre-Fire Plan Instructions." The change includes departmental title changes and the location of laminated Pre-Fire Plan Packets.

Summary

- I. No. This change is administrative in nature and is consistent with the fire protection requirements of the USAR. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change is administrative in nature and is consistent with the fire protection requirements of the USAR. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This procedure change is consistent with the Fire Protection Program as described in Technical Specifications Section 6.5.1.6, 6.5.2.8 and 6.8.1. Therefore, no margin of safety as defined in the bases for any Technical Specification is reduced.

SE No.: 90-202

Source Document: DCN 3238, Rev. 0

Description of Change

This drawing change modifies P&IDs 302-103, Condensate System, and 816-012, Instrument Air Tubing, to depict the as-built configuration of the control signal for the Turbine Hood Spray.

Summary

- I. No. The as-built configuration does not change the function or performance of the hood spray for the turbine, but shows the correct temperature sensing and transmitter configuration. Therefore, the possibility of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The operation of the Turbine Hood Spray is not addressed in Technical Specifications. Further, the function or performance of the hood spray has not been altered. Therefore, no margin of safety as defined in the bases for any Technical Specification will be reduced.

SE No.: 90-203

Source Document: DCN 3252, Rev. 0

Description of Change

This drawing change modifies Architectural Drawing E-015-044, Reactor Refueling Floor-Laydown Study, by adding the storage location of some plant tools and equipment.

Summary

- I. No. This change adds the storage location of various fuel handling tools and equipment to the drawing. There is no impact upon the actual tools or equipment. The function of the tools has not been altered. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety is not increased.
- II. No. This change does not impact the function of any fuel handling tool or equipment. Fuel handling operations have not been altered. Accident analysis has not been affected. Therefore, the possibility of creating an accident or malfunction of a type different than previously evaluated does not exist.
- III. No. There is no impact upon any fuel handling tools or equipment. Accident analysis has not been altered. The Refueling Technical Specifications have not been affected. Therefore, no margin of safety has been reduced.

SE No.: 90-204

Source Document: DCN 3354, Rev. 0  
USAR CR 90-116  
SOI-M40, Rev. 4

Description of Change

This evaluation analyzes the continuous operation of the Fuel Handling Building Ventilation (M40) System exhaust train plenum heaters when the associated fan is in service.

Summary

- I. No. The use of the heaters will aid in maintaining charcoal efficiency by reducing the relative humidity of the air entering the charcoal bed. The heaters are rated as continuous duty and will not cause the system to be operated outside of the design or testing limits. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The operation of the heaters cannot affect the reactor coolant pressure boundary or any of the fuel handling equipment. The charcoal plenum is equipped with temperature sensors, indicators, and high temperature alarms. Also installed is a fire suppression system. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This change does not exceed any limit associated with the original design analysis. Further, the physical parameters and conditions are consistent with that of the original design. Therefore, no margin of safety as defined in the bases for any Technical Specification will be reduced.

SE No.: 90-205

Source Document: LL&JED 1-90-136

Description of Change

This evaluation analyzes installation of a jumper to silence the Fuel Handling Building Evacuation Alarm while performing maintenance on Motor Control Center (MCC) FIC08.

Summary

- I. No. Maintenance on MCC FIC08 requires that the Fuel Handling Building Ventilation Radiation Monitor OD17-K710 be placed in a tripped condition per Technical Specifications. This will activate the Fuel Handling Building Evacuation Alarm continuously while the maintenance is in progress. The tripped radiation monitor and the continuous evacuation alarm would provide no useful information regarding the radiological conditions. Provisions are made to take grab samples at least once every 24 hours. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- ii. No. See Item I above.
- III. No. Technical Specification 3/4.3.7.1 requires grab samples to be taken when OD17-K710 is out of service. Since this specification is satisfied, the margin of safety will not be reduced.



SE No.: 90-206

Source Document: NR 90-S-276, Rev. 0  
NR 90-S-131, Rev. 1

### Description of Change

This evaluation analyzes the temporary use-as-is (Operational Conditions 4 and 5 only) disposition of the flow that was obtained during the Emergency Service Water (P45-ESW) System loop test performed under TXI-0112. The acceptance criteria for the flow to the Fuel Pool Heat Exchangers (G41-FPCC) was not met.

### Summary

- I. No. These systems, P45 and G41, are intended to mitigate the consequences of a LOOP/LOCA accident. Neither the ESW or the FPCC System can initiate a LOOP/LOCA and this disposition does not affect the systems ability to perform their mitigation functions. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This disposition will not affect the intended function or integrity of the ESW System. The reduced flow rate through the Fuel Pool Heat Exchangers have no effect on any other ESW heat load. Calculation G41-34, Revision 1 shows that the reduced flow through the Fuel Pool Heat Exchanger is in excess of the minimum required flow. The disposition will allow the Fuel Pool Heat Exchanger to function as intended. The disposition does not introduce any new failure modes. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The flow rate will not impact any plant function important to safety. The ESW System remains unchanged by this disposition. Therefore, no margin of safety as defined in the bases for any Technical Specification will be reduced.

SE No.: 90-207

Source Document: USAR CR 90-034

### Description of Change

This evaluation analyzes the following changes to the USAR: adding 1E51-F040 to the containment isolation valve listing, changing penetration P106 General Design Criteria (GDC) compliance from GDC-57 to GDC-56, and adding a text description of the Instrument Air System's compliance with GDC-57.

### Summary

- I. No. This USAR change incorporates the items described above. Penetration P106 has two isolation valves which exceeds the requirements of GDC-57. Agreements with the NRC reached during an inspection conducted between June 27 and October 23, 1989 changed compliance to GDC-56 for this penetration. This is similar to ECCS and RCIC suction line and test line penetrations. 1E51-F040 has always been relied upon as the primary isolation for this RCIC line (USAP Section 6.2.4.2.2.3). Further, 1E51-F040 will be type "C" tested with water to satisfy the containment leak rate criteria. The Instrument Air System's compliance with GDC-57 has not changed. The description is contained in a USAR table, however, this change incorporates the information into the main USAR text. Overall, no physical changes have occurred to the plant by this USAR change. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated has not increased.
- II. No. Addition of the valve to the containment isolation valve list does not alter the valve's function or operation. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Including 1E51-F040 in the Leak Rate Test program improves the margin of safety as defined in the Technical Specifications by reducing potential containment leakage post-LOCA.

SE No.: 90-209

Source Document: SXI-042, Rev. 0

### Description of Change

This evaluation analyzes testing the Auxiliary Boiler Ventilation System in the summer and winter modes of operation to obtain the relative pressures between the Heater Bay and Auxiliary Boiler Buildings. This information will be used to determine acceptable modes of operation for the Auxiliary Building Ventilation System.

### Summary

- I. No. The proposed test may induce the flow of air from the Heater Bay Building into the Auxiliary Boiler Building. This air is then free to pass out of the Auxiliary Boiler Building through the normally unmonitored roof exhaust fan. To quantify any possible release, temporary sampling equipment will be placed into service in the Auxiliary Boiler Building. The testing methods will be similar to those presently employed in the plant vent systems. This test also monitors the fan performance to ensure that component degradation does not occur. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The monitoring of radiological levels during the testing in a method consistent with the installed radiological monitors in the Heater Bay, eliminates the probability of an unmonitored release. Further, the test is designed to test nonsafety/nonseismic equipment not required for safe shutdown. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The proposed activity will not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 90-210

Source Document: USAR CR 90-106

Description of Change

This evaluation analyzes an editorial change to USAR Section 13.1.2.2.4 which addresses feedback of operating experience for the operating shift crew.

Summary

- I. No. This change involves administrative responsibilities of operational shift crews. It is consistent with NUREG 0737 Section I.C.5. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change is administrative in nature. Shift crew administrative responsibilities are not described in the Technical Specifications. Therefore, no margin of safety as defined in the bases for any Technical Specification is reduced.

SE No.: 90-211

Source Document: NR 90-5-279, Rev. 1

### Description of Change

This evaluation analyzes reducing the Containment Spray (E15) System Spray nozzles from 345 to 344 on the spray rings supplied by the Residual Head Removal System Loop "B".

### Summary

- I. No. The issue of having + 1 nozzles per spray loop will have an insignificant effect on the ability of the E15 System to perform its design function. The volume of water being pumped through the E15 System is unchanged. The addition or deletion of one nozzle per spray loop will have a negligible effect on the overall spray pattern. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The E15 System is essentially unchanged due to the constant flow rate total per loop and an insignificant change in spray pattern. The system still provides protection of containment from overpressurization. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The change of + 1 nozzle per loop does not change the rate at which water is dispersed through the loop or significantly change the spray coverage. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 90-212

Source Document: USAR CR 90-119

### Description of Change

This evaluation analyzes updating the description of the Fuel Pool Cooling and Cleanup (G41-FPCC) System operation prior to Unit 2 completion.

### Summary

- I. No. The FPCC System cooling sources are not being changed. System operation has not been altered. The estimated heat load the FPCC System must remove for single plant operation is significantly below the heat load associated with dual plant operation. Therefore, the probability of occurrence or the consequences of an accident or malfunction or equipment important to safety previously evaluated is not increased.
- II. No. The FPCC System is not being modified. Heat removal capacity for single unit operation is well within the design heat removal capacity associated with dual unit operation. Temperature conditions in the associated environmental zones have not been impacted. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluation does not exist.
- III. No. The FPCC System has not been altered. Heat removal capability for single unit operation remains bounded by that required for dual unit operation. Therefore, no margin of safety as defined in the basis for Technical Specifications is reduced.

SE No.: 90-213

Source Document: USAR CR 90-120

Description of Change

This evaluation analyzes a clarification to the USAR reflecting the use of Unit 1 Emergency Service Water (ESW) to cool the Fuel Pool Cooling and Cleanup (G41) Heat Exchangers prior to operation of Unit 2 Emergency Closed Cooling System.

Summary

- I. No. This change clarifies what the ESW to G41 heat exchanger flow rate and the estimated pool heat load will be prior to Unit 2 operation. Both values are below that which was previously analyzed for the G41 heat exchangers for the dual plant operation. The total number of bundles capable of being stored in the pool is not altered by this change. In addition, operation of G41 System is not being altered by this change. Total heat load being discharged to ultimate heat sink is below that of dual unit operation. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The operation of G41 System is not being altered by this change. No physical changes to the plant are being made or implied by this change. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This change does not adversely impact the ESW flow to the emergency core cooling system heat exchangers. The change does not affect the minimum spent fuel pool water levels nor the capability of cooling 4020 fuel assemblies for Unit 1 operation. Therefore, no margin of safety as defined in the bases for any Technical Specification will be reduced.

SE No.: 90-214

Source Document: NR 90-5-27, Rev. 2

### Description of Change

This evaluation analyzes the use-as-is disposition of the flow that was obtained during the Emergency Service Water (P45-ESW) loop test (TXI-0112). The acceptance criteria for the flow to the fuel pool heat exchangers (G41-FPCC) was not met.

### Summary

- I. No. The G41 and P45 Systems are designed to mitigate the consequences of a design basis accident. This change does not alter the accident mitigation functions of either of these systems. The ability of G41 to cool the spent fuel pools is not impacted by using a lower ESW flow rate. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. This disposition does not impact the G41 cooling function of the fuel pools. The lower ESW flow rates place less stress on the FPCC Heat Exchangers, thus improving the structural reliability of the heat exchangers. The effects of a failure of either the P45 or G41 System has not been altered. The function of the ESW System has not changed and the different flow rates to the G41 Heat Exchangers has no impact upon any other ESW System load. Therefore, the possibility of creating an accident or malfunction of a different type not previously evaluated does not exist.
- III. No. The ESW flow rate will not impact any plant function important to safety. The ESW System remains unchanged by this disposition. Therefore, no margin of safety is reduced.



SE No.: 90-215

Source Document: NR 90-S-280, Rev. 1

### Description of Change

This evaluation analyzes the temporary use of a nonconforming level switch in the Division 1 Diesel Generator (DG) fuel oil day tank. The switch and its associated secondary fuel oil transfer pump will not be considered operable until the rework disposition is implemented.

### Summary

- I. No. This nonconformance report is limited to the Division 1 DG Fuel Oil Transfer System. The nonconforming part is a non-qualified switch mechanism housed within a level switch whose output is used in the fuel oil transfer system control circuitry. The failure of this mechanism can result in either the continuous operation of the secondary transfer pump, premature/deferred operation of this pump, or no pump operation. Since there are two, redundant transfer pumps in the fuel oil transfer system the misoperation of one pump will not adversely impact the operation of the DG. Additionally, the use of this nonconforming component does not adversely impact the fuel oil transfer system control circuit. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated has not increased.
- II. No. This disposition does not introduce any new design standards, changes in DG performance, or changes in equipment reliability. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This disposition is limited only to Division 1 DG. As stated above the operation of this DG is not affected. Hence, the reliability of this onsite power supply is not impacted. Therefore, no margin of safety will be reduced.

SE No.: 90-216

Source Document: DCN 2972, Rev. 0

Description of Change

This drawing change revises P&ID 302-101, Condensate System, to indicate the presence of hotwell pump shaft seal connections.

Summary

- I. No. The editorial addition of match mark indications to indicate that the seal water as-built configuration to the hotwell pump can be found on P&ID 302-151 does not alter the physical plant. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This drawing revision is editorial in nature. The seal water lines are as-built and are not altered by this change. Therefore, no margin of safety as defined in the bases for any Technical Specification will be reduced.

SE No.: 90-217

Source Document: USAR CR 90-121

### Description of Change

This evaluation analyzes updating the USAR to reflect the charcoal loading of the Offgas (N64) adsorption trains.

### Summary

- I. No. Design change 89-213 added additional charcoal to Offgas Adsorbers 1N64-DO13A/B, -DO14A/B, and -DO15A/B. The adsorber is designed to hold 9076 lbs. Current loading is 7800 lbs. which is an increase of approximately 3000 lbs over the previous loading. This loading is below the design loading hence the new loading will not contribute to adsorber failure as described in USAR Section 15.7. The charcoal augmentation does not adversely affect any system or component required for accident mitigation. Further, the augmentation does not impact the radiation monitors which monitor and control the Offgas effluents. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The additional charcoal does not alter the probability of a fire for it has no impact upon any possible ignition source. The pressure drop across adsorbers is less than that experienced with the previous loading. Hence, the probability of flow blockage is remote. Therefore, the possibility of creating an accident or malfunction of a different type than previously evaluated not exist.
- III. No. The additional charcoal will reduce the Offgas System release rates. Therefore, the margin of safety as defined in the bases for the Technical Specifications will not be reduced.

SE No.: 90-218

Source Document: DCP 90-267, Rev 0.

### Description of Change

This design change installs a pressure gauge with an isolation valve at the Emergency Service Water (ESW) System Loop "A" sample point.

### Summary

- I. No. The gauge, valve and associated piping are safety class 3 components, and are installed in accordance with the applicable design and installation codes. System operation is not affected. Accident analysis is not altered. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This modification is consistent with the present design. System operation is not affected. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Overall system design and operation remains unchanged. Therefore, no margin of safety as defined in the bases for any Technical Specification will be reduced.

SE No.: 90-219

Source Document:

SXI-0046, Rev. 0

MFI 1-91-047

Description of Change

This evaluation analyzes a test which provides the Reactor Water Cleanup (RWCU) System's Backwash Receiving Tank (BWRT) pressure data which will be utilized to size a loop seal for the tank's overflow line.

Summary

- I. No. This test has no affect upon the RWCU System's ability to maintain water quality. There will be no impact upon the RWCU System's and the Containment Vessel and Drywell Purge (M14) System's ability to establish and maintain containment integrity. Therefore, the probability of occurrence or the consequences or an accident or malfunction of equipment important to safety previously evaluated is not increased.
- II. No. See Item I above.
- III. No. This test has no effect on the ability of the RWCU System to maintain required water quality limits. The M14 System operation will be within Technical Specification requirements. Therefore, no margin of safety as defined in the bases for any Technical Specification will be reduced.

SE No.: 90-220

Source Document: NR 90-S-299, Rev. 1

Description of Change

This evaluation analyzes the interim use-as-is disposition of the Post Accident Sample (P82) System valve 1P87-F055. The valve disc was installed without recording the valve disc serial number or heat number.

Summary

- I. No. The disc installed was in fact supplied as safety-related ASME and does have a serial number and is traceable to a heat number. This is documented on MR # 058990. The problem that exists is that the disc could be either of two discs supplied under that MR. Since traceability back to a heat number (in this case two numbers) does exist, the intent of the ASME code is satisfied. Further, a proper valve disc was installed into the valve and its safety function has not been altered or compromised. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The NR only addresses the valve disc traceability. Since the proper valve disc was installed into valve 1P87-F055 and the function, reliability and operability of it is not in question, the use-as-is disposition of the NR does not create an accident or malfunction of a different type than any evaluated previously in the USAR.
- III. No. The traceability of the valve disc does not jeopardize the margin of safety of this valve. Additionally, the operability of 1P87-F055 does not adversely impact the Technical Specification for containment isolation valves. Therefore, no margin of safety as defined in the bases for Technical Specifications is reduced.

SE No.: 90-221

Source Document: CR 90-427

### Description of Change

This evaluation analyzes the operation of the Control Complex Chill Water (P47) System with isolation valves P47-F290A/B and P47-F295A/B in a throttled position. Additionally, the input to the valves' low level isolation will be switched to a different instrument to ensure a faster isolation time. This will be an interim operating mode which is necessitated by the event described in CR 90-427.

### Summary

- I. No. The two activities described above will ensure that if the event postulated in CR 90-427 would occur the P47 System will not become inoperable (reference calculations P47-5 and P47-6). Implementation of the activities only impacts the nonsafety portion of the P47 System. Overall, the operation, function, and design intent of the P47 System will not be affected. The operation of the P47 System in this mode does not impact the function or operation of any system supported by P47. Further, the operation of P47 does not impact the accident/transient analysis described in the USAR. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated is not increased.
- II. No. Implementation of the two activities described above will reduce P47 flow to nonsafety components. Calculations indicate that this will not adversely affect these systems. No safety-related systems will be impacted. Therefore, the possibility of creating an accident or malfunction of different type than any previously evaluated does not exist.
- III. No. As stated above, no safety-related system will be affected by the proposed activity. Further, even if the event postulated in CR 90-427 would occur P47 would still be available to perform its intended function. Therefore, no margin of safety as defined in the bases for any Technical Specification will be reduced.

SE No.: 90-222

Source Document: Plant Data Book, Tab F, Rev. 0

Description of Change

This evaluation analyzes the relocation of the MAPLHGR Limits, the MAPFAC Curves, the MCPR Curves, and the LHGR Limits from the Technical Specifications to the Plant Data Book (PDB).

Summary

- I. No. The thermal limits establish boundaries on fuel and core operation. The actual limits in the PDB have been previously evaluated by the NRC as acceptable for use. The methodologies used to determine the limits have not been altered. Accident analysis contained in USAR Chapter 15 have not been adversely impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. The thermal limits have been evaluated by the NRC as acceptable. The methodologies used to determine the limits have not been altered. There is no impact upon equipment deemed important to safety. Fuel integrity is maintained. Therefore, the possibility of creating an accident or malfunction of a type different than previously evaluated does not exist.
- III. No. Fuel cladding integrity is maintained. The methodologies used to determine the thermal limits have not been altered. Accident analysis has not been adversely impacted. ECCS acceptance criteria per 10CFR50.46 remains satisfied. Therefore, no margin of safety is reduced.



SE No.: 90-223

Source Document: DOSEPROJ, Rev. 2.4

Description of Change

This evaluation analyzes revisions to the "Acumdose" portion of the DOSEPROJ program. This program is a PC based computer program used to calculate the radiological impacts of potential accidents.

Summary

- I. No. DOSEPROJ is a computer program which uses plant radiological and meteorological parameters to provide a prediction as to the radiological impact of a potential accident. This program does not adversely impact any plant system or component. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. DOSEPROJ merely utilizes data from plant equipment and in no way impacts plant systems. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. DOSEPROJ program simply utilizes plant data for calculational purposes only. Therefore, no margin of safety will be reduced.

SE No.: 90-224

Source Document: USAR CR 90-112

### Description of Change

This evaluation analyzes a clarification to the USAR addressing how the acceptance criteria of Standard Review Plan Section 3.6 is met for moderate energy line breaks (MELB) in the Emergency Service Water Pumphouse (ESWPH).

### Summary

- I. No. This change only adds information to describe how the ESWPH meets the acceptance criteria for moderate energy line breaks. The MELB analyses are not being altered. No changes are being made to any plant structure, system, or component. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change does not change the plant. The safe shutdown components in the ESWPH will still function as designed. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This change only adds a description of the MELB analysis for the ESWPH to the USAR. This MELB analysis has not been altered. No changes have been made to the plant. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 90-226

Source Document: DCN 3382, Rev. 0

Description of Change

This drawing change revises the calibration information on various P&ID's for the Reactor Vessel Water Level Instrumentation as field implemented per FDDR KL 1-7012 Rev. 2 & 3.

Summary

- I. No. GE SIL 470 Supplement 1 previously reported that specific operating biases (e.g., Drywell operating temperature, vessel thermal growth) was not accounted for in the plant reactor vessel level instrument calibration calculations. This resulted in an evaluation for Perry (SIL Response), that the biases existed, but that additional margin now existed between plant safety setpoints and the setting analytical limits. The FDDR was implemented to include the operating biases in instrument calibration data which results in improved precision for the reactor vessel level instrumentation. This improved provision does not alter the safety-related reactor vessel level trip setpoints or their associated analytical limits. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The margin of safety between Technical Specification reactor vessel level trip settings and their associated analytical limits was not changed or reduced by implementing the new calibration data. Therefore, no margin of safety as defined in the bases for Technical Specifications is reduced.

SE No.: 90-227

Source Document: NR 90-N-321, Rev. 0

### Description of Change

This evaluation analyzes the temporary use-as-is disposition of the Auxiliary Boiler (P61) feedwater recirculation lines without the orifice plates installed.

### Summary

- I. No. The function of the Auxiliary Boiler feedwater pump's recirculation lines will remain unaffected by this disposition. The feedwater pumps will continue to be cooled by recirculation through these lines. The valve downstream of the orifice union locations can be throttled to provide the required recirculation flow until the orifice unions can be installed. The Auxiliary Boiler feedwater system has no effect on the safety of the plant. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The Auxiliary Steam System is no safety. Operation of this system has no impact upon plant safety. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Technical Specifications do not address the Auxiliary Steam System. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 90-228

Source Document: NR 90-S-323, Rev. 0

Description of Change

This evaluation analyzes the service life extension of one cycle for Pullman and GE supplied E-Systems snubbers. The basis for this extension is contained in a Lake Engineering Co. (Greenville, RI) report dealing with said subject.

Summary

- I. No. A comprehensive visual and dimensional evaluation of the bayonet seals in four snubbers indicated a higher level of degradation than that previously observed in ethylene-propylene bayonet seals with a similar history. However, the seals were nonetheless suitable for additional service life based upon measured compression set values and seal flexibility. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. Technical Specifications describes the snubber's service life based on monitoring snubber service conditions and maintenance history. Extension of service life for these snubbers is within the criteria described in the bases. Therefore, the margins of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 90-229

Source Document: MFI 1-90-149

### Description of Change

This evaluation analyzes the Mechanical Foreign Item which installs inspection plugs downstream of RHR and HPCS drain valves which drain to the Auxiliary Building Equipment Drain Manifold. Inspection plugs are installed on nonsafety piping.

### Summary

- I. No. The inspection plugs will be installed per ANSI B31.1 Section 104.3.1 (C.2). Installation in accordance with ANSI B31.1 will ensure that the pipe integrity will not be reduced. The installation of the drain plugs will aid in maintaining the drain manifold closed to the atmosphere, thus reducing the potential for flooding in the Auxiliary Building. The inspection plugs (and their removal) will be administratively controlled, further reducing the possibility of flooding. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The installation standards used to install the plugs maintains the piping integrity. Removal of the plugs is administratively controlled. The plugs have no impact on any equipment other than the drain manifold. Common mode flooding is not possible. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The operability of systems in the Auxiliary Building are not affected by the addition of inspection plugs in the equipment drain manifold. The addition of the plugs has no potential impact on any other equipment. Therefore, the margins of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 90-230

Source Document: DCN 3253, Rev. 0

Description of Change

This drawing change documents on P&IDs 256-014, Electrical One Line Diagram for Non-class 1E Buses L21 and L22, and 206-020, Electrical One Line Diagram for 480V Distribution, the addition of the alternate power supply and associated transfer and fuse enclosures for P&R Building permanent power.

Summary

- I. No. The equipment depicted on these drawings was installed and is operated by Non-Perry Plant Operators. It will preclude the possibility of paralleling the Quincy feeder with the Unit 2 offsite power source. This change will not affect the availability of the Unit 2 offsite power source or its interface with class 1E power systems. Additionally, the LTOP analysis described in the USAR has not been altered. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The equipment depicted is nonsafety and has no effect on equipment important to plant safety. The power supply to the P&R Building is not required for plant operation. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The modifications depicted are nonsafety. The probability of losing the Unit 2 offsite power supply has not been impacted. Therefore, the margins of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 90-231

Source Document: FCR 14840

### Description of Change

This evaluation analyzes the temporary installation of a nitrogen freeze seal in the Turbine Building Closed Cooling (P44-TBCC) supply piping to the Isophase Bus Duct Cooling (R13) System.

### Summary

- I. No. This freeze seal permits isolation of instrument 1P44-N0557 for removal and maintenance without affecting the operability of the TBCC System. The TBCC system is not required for safe shutdown. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The TBCC is nonsafety and not required for safe shutdown. To minimize the potential for flooding should this freeze seal fail, the line can be manually plugged. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The TBCC System or the Isophase Bus Duct Cooling System are not described in the Technical Specifications. The freeze seal and its postulated failure does not impact any safety-related system. Therefore, no margin of safety as described in the bases for any Technical Specification will be reduced.



SE No.: 90-232

Source Document: DCP 90-292, Rev. 0

### Description of Change

This design change replaces the Fire Protection (P54) System Yoloy pipe with cement lined ductile iron and ductile iron fittings in the ten-inch, underground line located to the west of Warehouse 1.

### Summary

- I. No. This change is being performed to repair a break in the line where it enters the building. Pipe routing is unchanged and the materials meet the requirements of NFPA-24. No new fire hazards are introduced. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change does not adversely impact the design of any fire suppression feature, detection component, or fire containment component. Further, the change only impacts the Fire Protection System and is not functionally related to any known failure mechanism for plant features important to safety. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. There is no relationship between the proposed change and the bases for any Technical Specification. Therefore, the margins of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 90-233

Source Document: DCN 3258, Rev. 0

Description of Change

This drawing change will revise P&ID 913-001, Control Complex Chill Water, to reflect the installed condition of level indicator OP47-R262A.

Summary

- I. No. The installation of OP47-R262A was in accordance with the approved design. However, the drawing did not properly reflect this installation. The function or the operation of OP47-R262A will not be altered. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The purpose of OP47-R262A is to notify personnel of the level of liquid in the expansion tank. It does not perform any accident mitigation function. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The drawing change is editorial in nature. It will not affect the installed condition or the design of level indicator OP47-R262A. The indicator will continue to function as designed. Therefore, the margins of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-001

Source Document: OM15A Emergency Plan for PNPP, Rev. 10, TC-1

Description of Change

This evaluation analyzes changes made to OM15A, Emergency Plan for PNPP. The changes are derived from comments made by the State of Ohio and local county Emergency Management Agencies as part of their annual review of the Perry Emergency Plan and Emergency Action levels in accordance with Appendix E (IV.B) of 10CFR50.

Summary

- I. No. The proposed changes are administrative in nature. The changes do not effect or direct the operation of any plant system, equipment, or component. The changes do not affect previously evaluated USAR accidents. The effectiveness of the emergency plan has not been reduced per 10CFR50.54(q). Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. These changes are administrative in nature and do not effect or direct the operation, equipment or components. The effectiveness of the emergency plant has not been reduced per 10CFR50.54(q). Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.

SE No.: 91-002

Source Document: USAR CR 90-130

### Description of Change

This evaluation analyzes the removal of a requirement that a pressurized water spray be used for spent fuel cask decontamination, while retaining the requirements for a decontamination method. A pressurized water spray has the potential for causing airborne and personnel contamination problems.

### Summary

- I. No. The methods used to decontaminate the cask would still have to meet all other USAR requirements. Further, the method must satisfy the requirements with regards to the usage of the cask. Cask decontamination methods do not affect any fission product barrier. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. Cask decontamination does not affect any plant system. Using decontamination methods that satisfy other USAR requirements should reduce the potential for airborne contamination. No fission product barrier is affected. Therefore, the possibility of creating an accident or malfunction of a different type than any previously evaluated does not exist.
- III. No. Cask decontamination is not described in Technical Specifications. Cask decontamination occurs just prior to shipping, hence no fission product barrier is impacted. Therefore, no margins of safety as defined in the Technical Specifications will be reduced.

SE No.: 91-003

Source Document: DCN-3242, Rev. 0  
USAR CR 91-026

### Description of Change

This drawing change revises an administrative note on P&ID 302-621, Emergency Closed Cooling Water (P42) System, to permit the use of hose/tubing to direct surge tank overflow to a suitable collection facility.

### Summary

- I. No. The addition of hose/tubing does not alter the system function or reliability. This reduces the potential for loss of Division 1 equipment by directing surge tank overflow to drains rather than the floor and into the Div. 1 Electrical Penetration Room. P42 System redundancy and the emergency source of make-up water to P42 are not impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. Each P42 surge tank has three separate vents to which the hoses are attached. The hoses are not interconnected. A complete blockage of all three vent hoses is not probable. As stated above, this change reduces the potential for loss of Div. 1 equipment due to tank overflow. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Operability of the Emergency Closed Cooling Water System will be maintained. The redundant cooling capacity as described in Technical Specifications is not reduced. Therefore, the margins of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-004

Source Document:

DCN 3292, Rev. 0

MFI 88-188

Description of Change

This drawing change revises P&ID 302-733, Liquid Radwaste, to show a weld cap on a line which prevents conditioning chemicals from being added to the Chemical Waste Tank, OG50-A0005B.

Summary

- I. No. This change does not affect the integrity of the tank. The addition or deletion of conditioning chemicals will not aggravate the consequences of a tank failure as analyzed since these chemicals have no effect on the levels of radioactivity which would be released. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The ability to control radwaste effluents is not reduced. Tank integrity is not affected. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-005

Source Document: USAR CR 90-065

Description of Change

This evaluation analyzes the addition of information to the USAR concerning the Standby Liquid Control (SLC) Transfer System.

System

- I. No. The addition of the SLC Transfer System description in the USAR does not affect any previous evaluations performed in the USAR because the SLC Transfer System is not an active plant component and not required to function to mitigate the consequences of an accident and/or a transient. The failure of the SLC Transfer System does not affect any other plant system or component. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The SLC Transfer System is only activated to prepare borated water in the case of the very unlikely event of needing multiple borated water injections. The SLC Transfer System pumps the borated solution to the SLC storage tank where the SLC System injects it into the reactor vessel. The SLC System is designed to shutdown the reactor with one tank of borated solution. Hence, SLC System design is not impacted. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The SLC Transfer System allows for the long term operation of the SLC System if necessary. This increases the margin of safety for reactivity control. Therefore, no margins of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-006

Source Document: USAR CR 90-075

Description of Change

This evaluation analyzes revising the USAR to add the Low Pressure Core Spray (LPCS), the High Pressure Core Spray (HPCS), and the Reactor Core Injection Cooling (RCIC) suction strainers to USAR Table 3.2-1.

Summary

- I. No. This change is editorial in nature. The strainers listed above are included in other sections of the USAR and have been included in the various USAR analyses. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. Addition of these existing strainers to the USAR has no effect on Technical Specifications. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.



SE No.: 91-007

Source Document: USAR CR 91-015

Description of Change

This evaluation analyzes correcting various editorial errors in the USAR, i.e. typos, grammatical errors, and changes previously evaluated and approved but not properly incorporated.

Summary

- I. No. These changes are editorial only. This change request just properly incorporates previously approved USAR changes. The changes do not alter the design, function, or operation of any plant system or component. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. These changes are editorial in nature. They do not impact any plant margin of safety. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-008

Source Document: DCN 3427, Rev. 0

Description of Change

This drawing change revises P&ID 302-661, Containment Spray (E15) System, to reflect the nozzle spacing and nozzle orientation as required by Reg. Guide 1.70.

Summary

- I. No. This change is editorial in nature and does not impact the ability of E15 to perform its design function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change is editorial only. It does not alter the E15 System nor does it impact any equipment important to safety. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This change does not impact the E15 System or any equipment important to safety. Therefore, no margin of safety as defined in the bases for Technical Specifications is reduced.

SE No.: 91-009

Source Document: USAR CR 91-003

Description of Change

This evaluation analyzes clarifying several terms in three USAR sections. The term "block" is being changed to "refueling rod block" in Sections 15.4.1.1.2.f and 15.4.1.2.2.3. The term "out of sequence" is being added before the phrase "continuous, rod withdrawal errors" in two locations in section 15.4.1.2.2.1.

Summary

- I. No. The clarifications are based upon a GE evaluation of the IRM Rod Block function which concludes that IRM Rod Blocks are not relied upon for any accident/transient mitigation. Further, the design/operation of the plant has not been changed. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change is editorial and is consistent with Technical Specifications. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-010

Source Document: USAR CR 91-012

Description of Change

This evaluation analyzes revising the Standby Diesel Generator (DG) fuel oil properties and methods of testing. This safety evaluation revises Safety Evaluation 90-175.

Summary

- I. No. The use of fuel oil with different properties does not impact the design, function or performance of the DG. The new fuel oil remains in conformance with Reg. Guide 1.37 and the various ASTM Standards associated with fuel oils. The testing of the fuel oil is consistent with the ANSI and ASTM standards associated with fuel oils. Therefore, the probability or occurrence or the consequences of an accident or malfunction previously evaluated is not increased.
- II. No. The new fuel does not adversely affect any plant equipment. The design or function of the DG has not been impacted. Therefore, the possibility of creating an accident or malfunction of a type different or malfunction of a type different than evaluated does not exist.
- III. No. The new fuel does not impact the design, function, or performance of the DG. Hence, the reliability of the onsite power supplies in accordance with Technical Specification 3/4.8 has not been impacted. Therefore, no margin of safety has been reduced.

SE No.: 91-011

Source Document: USAR CR 91-019

Description of Change

This evaluation analyzes correcting various editorial errors in the USAR, i.e. typos, format corrections, grammar corrections, and changes previously evaluated and approved but not properly incorporated.

Summary

- I. No. These changes are editorial only. This change request just properly incorporates previously approved USAR changes. The changes do not alter the design, function, or operation of any plant system or component. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. These changes are editorial in nature. They do not impact any plant margin of safety. Therefore, no margin of safety as defined in the bases for Technical Specification will be reduced.

SE No.: 91-012

Source Document: USAR CR 91-020

### Description of Change

This evaluation analyzes revising PNPP's License Commitments (LC) #7, #8, and #13. LC #7 describes Perry's compliance with R.G. 1.97. This change accounts for all licensing activity that occurred in 1990. LC #8 states that a portion of the commitment has been closed as detailed in a letter sent to the NRC. The change to LC #13 merely adds another letter to the listed references which provides the results of a fatigue analysis for the in-core guide tubes during single loop operation.

### Summary

- I. No. The LC's do not make any plant modifications. The changes also do not impact accident analysis. The changes simply update the USAR to include the PNPP responses made to the NRC as documented in various submittals to the NRC. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The changes are editorial. No plant modifications have been made. Accident analysis has not been altered. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The changes are editorial. The changes just update the USAR to include responses made to the NRC as documented in various other correspondence. No plant changes have been made. Therefore, no margin of safety as defined in the bases for Technical Specification will be reduced.

SE No.: 91-013

Source Document: USAR CR 90-021

### Description of Change

This evaluation analyzes various editorial text changes to the USAR sections which describe the plant organization.

### Summary

- I. No. This change is editorial. It only updates the description of the plant organization as stated in the USAR. The plant has not been modified or altered. Accident analysis has not been impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change is editorial. The plant organization has not been altered. The plant has not changed. Accident analysis has not been impacted. Therefore, the possibility for creating an accident or malfunction of a different type than any evaluated previously does not exist.
- III. No. This change is editorial in nature. It does not alter the plant. The plant organization remains consistent with the organization that is described in Technical Specification. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-014

Source Document:

DCN 3383, Rev. 0

SCN 304-DSP-R45-R46-R47-3-4549

### Description of Change

This evaluation analyzes revising various P&ID's and the design specification associated with the Standby Diesel Generators (DG) to incorporate a change in the code associated with the fuel oil transfer pump level switches.

### Summary

- I. No. This change revises the code class for the DG fuel oil transfer pump level switch connections to the fuel oil day tank. The change is from Class 3 to non-ASME safety-related. However, the design still satisfies the ASME code Section III requirements. Further, these connections are not relied upon to maintain day tank integrity. The level switches continue to provide their safety-related function. Overall, this change does not adversely impact the design, function, or performance of the DG's. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. This change does not impact the design, function, or performance of the DG's. The DG's will still provide all mitigation actions required by accident analyses. Therefore, the possibility of creating an accident or malfunction of a type different than previously evaluated does not exist.
- III. No. This change does not adversely impact the design or operation of the DG's. There is no impact upon Technical Specification 3/4.8 which deals with onsite power supplies. Therefore, no margin of safety has been reduced.



SE No.: 91-015

Source Document: USAR CR 91-022

Description of Change

This evaluation analyzes changing the reporting point of the Independent Safety Engineering Group (ISEG) from the Director, Perry Nuclear Engineering Department (PNED), to the Vice President, Nuclear-Perry.

Summary

- I. No. The administrative reporting point of the ISEG has no impact upon any plant equipment or accident analysis. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. Technical Specifications state the ISEG recommendations and activity records will be sent to the Director, PNED. ISEG will continue to comply with this statement. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-016

Source Document: DCN 3417, Rev. 0

Description of Change

This drawing change updates P&IDs 806-022 and 806-023, Plant Radiation Monitoring System, to accurately reflect MPL symbolism.

Summary

- I. No. This change is editorial in nature. It just corrects instrument symbol designation on the P&IDs. The design and function of the instruments in question have not been altered. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change is editorial in nature. The instruments in question are not safety-related. Further, the function of the instruments have not changed. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-017

Source Document: USAR CR 91-027

Description of Change

This evaluation analyzes making various editorial revisions to the USAR. The revisions include administrative corrections and updating figure lists.

Summary

- I. No. The changes contained in this USAR change request are editorial in nature. There are no changes to the plant. Accident analysis has not been impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated in the USAR is not increased.
- II. No. These changes are editorial only. The plant has not been changed nor has accident analysis been impacted. Hence, the possibility of creating an accident or malfunction of a type different than evaluated does not exist.
- III. No. These changes are editorial. The plant has not been altered. Accident analysis has not been impacted. Therefore, no margin of safety will be reduced.

SE No.: 91-01B

Source Documents: DCN 3291, Rev. 0

Description of Change

This drawing change revises P&ID 302-162, Makeup Water Pretreatment (P20) System. The change includes deleting the low-low clearwell water trip and the P21 regeneration permissive interlock associated with the clearwell pumps.

Summary

- I. No. This change eliminates the inadvertent trips of the clearwell pumps. The clearwell pumps supply seal water to the service water and circulating water pumps. Loss of seal water to those pumps can result in a plant trip. The difference in clearwell tank level between the low-low level trip and low-low level alarm provides sufficient volume even under maximum system demand to ensure compensatory actions can be taken to maintain clearwell flow. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The P20 System is nonsafety-related. The removal of the low-low level trip does not impact availability of the service water or the circulating water pumps. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. P20 System is nonsafety nor is it describe in Technical Specifications. Therefore, no margin of safety as defined in the bases for Technical Specification will be reduced.

SE No.: 91-019

Source Document: DCP 90-160, Rev. 0

Description of Change

This design change replaces the existing Unit 1 plant security perimeter equipment with an improved version of detection equipment.

Summary

- I. No. The existing "E-Field" Equipment will be replaced with a Siemens "Perifield" System. This change is unique to the plant security system. Additionally, it is an improvement that according to 10CFR50.54(p) does not require prior NRC approval. No other plant systems are involved. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The Security System is not addressed in the Technical Specifications. Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.

SE No.: 91-021

Source Document: DCP 89-028, Rev. 6

### Description of Change

This design change adds valves and tees to the Offgas (N64) System Hydrogen Analyzer internal piping. This additional valving will be used to reduce contamination levels prior to performing maintenance on the analyzers.

### Summary

- I. No. The new valves are used for testing/maintenance purposes only. They do not change the function of the hydrogen analyzers. Failure of the hydrogen analyzers is bounded by the Offgas failures analyzed in USAR Chapter 15. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change does not alter the function of the hydrogen analyzers. Valve failure is bounded by analyzers contained in USAR Chapter 15. Further, the hydrogen analyzers are nonsafety and have no impact upon any equipment important to safety. Therefore, the possibility for creating an accident or malfunction of a different type than any evaluated previously does not exist.
- III. No. The design change does not alter the function of the hydrogen analyzers. Failure of the hydrogen analyzers is bounded by the Offgas failures analyzed in USAR Chapter 15. Hydrogen analyzer internal piping is not described in the Technical Specifications. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-022

Source Document: LL&JED 1-91-030

### Description of Change

This evaluation analyzes installation of a jumper to bypass the torque switches associated with motor-operated valves 1E12-P024A/B. This will permit the operator to ride through any momentary increases of thrust while closing the valves under flow conditions.

### Summary

- I. No. Bypassing the torque switch for those valves is part of the overall Residual Heat Removal (E12) System design. Isolation capability of the valves has not been impacted. The overall function of the valves has not been changed. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. The overall design and function of the valves has not been changed. To ensure the valve actuator is not adversely impacted, the number of valve operations is administratively limited. Hence, the possibility of creating an accident or malfunction of a type different than evaluated does not exist.
- III. No. The isolation function of those valves has not been impacted. Therefore, the margin of safety is described in the bases of Technical Specifications will not be reduced.

SE No.: 91-023

Source Document: Installation Standard Specification SP-2450, Rev. 2

Description of Change

This evaluation analyzes the use of the Hilti Kwik-Bolt II Anchor as an acceptable concrete expansion anchor in safety-related buildings.

Summary

- I. No. The specification change permits the use of Hilti Kwik-Bolt II Anchors as concrete expansion anchors in safety-related structures. Structural integrity of safety class structures is not compromised by the use of this new anchor. Further, Hilti bolt installations for maintenance/new work/rework are still in accordance with the installation specification. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated is not increased.
- II. No. The specification change does not impact the structural integrity of safety class structures. Hilti bolts are still installed in accordance with the installation specification. As such all design requirements are still satisfied. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously does not exist.
- III. No. As stated above, structural integrity of safety class structures is not impacted. Hence, the margin of safety as defined in bases for technical specifications is not reduced.



SE No.: 91-024

Source Document: DCN 3424, Rev. 0

Description of Change

This drawing change makes an editorial revision to P&ID 912-610, Control Room HVAC (M25) System, which removed several MPL numbers used only for reference location purposes.

Summary

- I. No. This drawing change is editorial only. The operability and function of the M25 System has not been altered. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change does not physically alter any plant system design or equipment. The function and operation of the M25 System has not been impacted. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This change is editorial in nature. Operation of the M25 System has not been altered. Therefore, no margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-025

Source Document: DCN 3339, Rev. 0

Description of Change

This drawing change makes editorial revisions to P&IDs 302-103, Condensate System, and 302-601 and 302-602, Reactor Recirculation System. The change to drawing 302-103 will correct the panel location of 1N21-RO481. The change to drawings 302-601 and 302-602 will correct the power source to 1B33-N015A/B.

Summary

- I. No. This drawing change is editorial in nature. The design or operation of the plant is not affected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change is editorial in nature. The design or operation of the plant is not affected. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-026

Source Document: USAR CR 91-030

### Description of Change

This evaluation analyzes a clarification made to the USAR regarding the use of Reactor Core Isolation Cooling (E51-RCIC) System valve 1E51-F040 as a test barrier during the performance of the Containment Integrated Leak Rate Test (CILRT).

### Summary

- I. No. This USAR clarification does not alter the design or function of the containment isolation system. RCIC System design or operation is not affected. Accident analysis is not impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. This USAR clarification does not impact the RCIC System or the containment isolation system. Isolation system failures have been analyzed and analyses have not been affected. Accident analysis has not been changed. Hence, the possibility of creating an accident or malfunction of a type different than previously evaluated does not exist.
- III. No. This change does not alter the design or function of the containment isolation system. It does not prevent an isolation from occurring if it is required. Therefore, no margin of safety has been reduced.

SE No.: 91-027

Source Document: USAR CR 91-031

Description of Change

This evaluation analyzes revising the USAR by incorporating a new plant management organization.

Summary

- I. No. This change is administrative in nature. Management responsibilities have not been deleted only reassigned. Plant design or operation have not been affected. Accident analysis has not been altered. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment is not increased.
- II. No. See Item I above.
- III. No. This change is administrative in nature. The plant has not been changed. The new plant organization is consistent with Technical Specification 6.2. Therefore, no margin will be reduced.

SE No.: 91-028

Source Document:

DCN 3444, Rev. 0

NR 91-N-013, Rev. 0

Description of Change

This drawing change modifies P&ID 302-110, Condensate Demineralization (N24) System, by deleting two isolation valves between the condensate demineralizer backwash rinse and regeneration chemical receiving tank level bubbler tubes and the level transmitters.

Summary

- I. No. NR 91-N-103 states the valves were never installed. The valves are not required to maintain and operate the tank level instrumentation. The instrument design is not altered by deletion of these two valves, 1N24-F0615 and 1N24-F0616. Instrument valving associated with the level transmitter permits proper transmitter operation and maintenance. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The nonsafety level instrumentation is still capable of performing its design function without valves 1N24-F0615 and 1N24-F0616. Instrumentation valves are provided which permit proper operation and maintenance of the instrumentation. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The N24 System is not addressed by Technical Specifications. In addition, reactor chemistry is not affected since the instrument performance has not been affected or changed. Therefore, no margin of safety as defined in the bases for any Technical Specification will be reduced.

SE No.: 91-029

Source Document: USAR CR 91-055

Description of Change

This evaluation analyzes revising USAR Sections 3.2 and 9.4 to reflect that the nonsafety portions of the Control Complex Chilled Water (P47) System will maintain pressure integrity during seismic events.

Summary

- I. No. The P47 System design and original operating configuration will not be adversely impacted by a seismic event (reference Stevenson & Associates report on said subject and calculations P47-6 through P47-9). Accident analysis is not affected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment is not increased.
- II. No. The design or operation of the P47 System will not be adversely impacted. The valves used to isolate the nonsafety portions of the system from the safety portions will not be affected. The above referenced calculations show that P47 failures will not result in a flooding hazard. Therefore, the possibility of creating an accident or malfunction of a type different than evaluated does not exist.
- III. No. The design, function, and operation of the P47 System will not be adversely impacted. The cooling systems supported by P47 will also not be affected. Therefore, the margins of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-030

Source Document: DCN 3401, Rev. 0

Description of Change

This drawing change revises P&ID 302-212, Service Water (P41) System, to make permanent a temporary Service Water System pipe. The piping will serve as a convenient source of water for work associated with the condenser waterboxes.

Summary

- I. No. This modification does not alter system operation. The P41 System is nonsafety-related and is not required for safe shutdown. Postulated failure of the piping would result in flooding of the Turbine Building. However, this scenario is bounded by the flooding analysis contained in USAR Section 10.4.5.3.1. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The modification is consistent with the existing P41 design and system operation remains unaltered. Piping failure is bounded by the USAR. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The modified P41 line has no affect on system or plant operation. Its failure is bounded by the USAR. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-031

Source Document: DCN 3363, Rev. 0

### Description of Change

This evaluation analyzes updating various Emergency Service Water (P45-ESW) System related USAR sections and plant drawings. The USAR changes include revising ESW heat loads, updating operating parameters, and clarifying the use of lay-up for the Residual Heat Removal System Heat Exchangers. The drawing changes include revising operating parameters on P&ID 302-793, Emergency Service Water Operating Data, and incorporating the LOOP signal and note clarification on P&ID 302-621, Emergency Closed Cooling System Unit 1, and 352-621, Emergency Closed Cooling System Unit 2.

### Summary

- I. No. These changes are based upon previously evaluated and approved design information (reference: calc's G41-34 Rev. 2, P45-30 Rev. 3, G/C 2.6.13.1 Rev. 1; DCP 90-086; Safety eval's 88-387, 89-079, 90-105, 90-155, 90-198, 90-213). As such, this change is editorial in nature and does not impact the current operation of the plant nor affect any plant equipment. Therefore, the probability of occurrence or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change does not modify the current operation of the plant nor affect equipment. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This change is editorial. ESW System availability is not altered. Therefore, no margin of safety as defined in the bases for Technical Specification will be reduced.



SE No.: 91-032

Source Document: USAR CR 91-038

### Description of Change

This evaluation analyzes an update to USAR Figure 8.3-19, Containment Vessel Penetration Locations, which reflects the conversion of Reactor Core Isolation Cooling (E51) System valve 1E51-F063 from a DC to an AC operated valve. (Reference Safety Evaluations 87-111, 87-112, 87-113, 87-381, and 89-067).

### Summary

- I. No. This change does not alter the function of the E51 System. The modification is installed in accordance with the approved standards documented in the USAR. Accident analysis has not been impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. The function of the E51 System or its components have not been altered. The modifications is installed in accordance with approved standards. Accident analysis has not been impacted. Therefore, the possibility of creating an accident or malfunction of a type different than previously evaluated does not exist.
- III. No. The function of the E51 System has not been altered. The change is consistent with Technical Specifications 3/4.6.4, 3/4.8.2.1 and 3/4.8.3.2. Therefore, no margin of safety as defined in the bases of Technical Specifications has been reduced.

SE No.: 91-033

Source Document: DCN 2990, Rev. 0  
USAR CR 91-036

Description of Change

This drawing change revises P&ID 302-112, High Pressure Heater Drains and Vents, by correcting a MPL designation.

Summary

- I. No. This is an editorial change only. There is no impact upon the function of any plant equipment. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change is editorial. There is no impact upon the plant. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-034

Source Document: DCN 3358, Rev. 0

Description of Change

This drawing change updates Environmental Zone Drawings 022-001, 022-006, 022-007, 022-050, 022-051, 022-062, and 022-063 to reflect the up-to-date environmental zone temperatures of the Steam Tunnel and Turbine Building.

Summary

- I. No. This change has no effect on equipment located in these environmental zones. The equipment remains qualified for normal/abnormal and accident operating conditions. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously of evaluated in the USAR is not increased.
- II. No. The equipment design limit in the affected zones is not exceeded. The equipment remains qualified to perform its safety function. Accident analysis is not impacted. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. All equipment within the affected zones remains qualified for normal/abnormal and accident conditions. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-035

Source Document: PAP-0101, Rev. 5, TC-1

Description of Change

This change updates PAP-0101, "Perry Organization", to reflect that the Independent Safety Engineering Group (ISEG) and the Corporate Health Physicist report to the Vice President Nuclear. (Reference Safety Evaluations 91-005 and 91-027)

Summary

- I. No. This change is administrative in nature. The functions of both the Corporate Health Physicist and ISEG are not altered. Only their reporting point has changed. The change in reporting point does not alter the design or operation of the plant. Accident analysis is not impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment to safety previously evaluated is not increased.
- II. No. See Item I above.
- III. No. This change is administrative in nature. It is consistent with the administrative requirements of the Technical Specifications. Therefore, no margin of safety will be reduced.

SE No.: 91-036

Source Document: USAR CR 91-039  
DCN 3150, Rev. 0

Description of Change

This evaluation analyzes updating USAR Figure 6.5-1, Annulus Exhaust Gas Treatment System, to reflect editorial changes made to P&ID 912-605, Reactor Building Annulus Exhaust Gas Treatment Unit 1.

Summary

- I. No. This change is editorial in nature. Control panel location numbers have been corrected on this figure. There is no change to system operability. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- Iii. No. The change is editorial only and does not affect any equipment important to safety. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-037

Source Document: DCP 90-196, Rev. 0

### Description of Change

This design change replaces the septa tubes in the Condensate Filtration (N23) System with a new type. The new tubes, as a result of technology change, will allow removal of suspended solids in the N23 System without the use of any precoat material.

### Summary

- I. No. The use of different septa, does not compromise the effluent water quality nor any other performance parameter associated with the N23 System. The availability or reliability of the N23 System has not changed. The N23 System is not used to mitigate the effects of any plant accident or transient. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The N23 System does not perform any function important to safety. Effluent water quality has not been compromised. The system is designed to automatically bypass flow should any septa become plugged. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The use of different septa does not impact water quality. Therefore, no margin of safety for any chemistry related Technical Specification will be reduced.

SE No.: 91-038

Source Document: MFI 1-90-009

### Description of Change

This Mechanical Foreign Item analyzes the addition of extra charcoal to the Offgas (N64) System charcoal beds. This is a revision to Safety Evaluation 90-008.

### Summary

- I. No. This MFI analyzes the addition of extra charcoal to the N64 charcoal beds. Adsorbers N64-DO12A/B will have no charcoal while adsorbers N64-DO13A/B, DO14A/B, and DO15A/B will each contain approximately 4 tons of charcoal. This results in approximately 60 ft. of charcoal in the flowpath. This exceeds the design of 53 ft. as stated in USAR Section 11.3.2.1.11. Failure of the adsorber vessel is bounded by the analysis described in USAR Section 15.7.1.1. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment is not increased.
- II. No. The additional charcoal affects only the adsorber vessels. No equipment important to safety is impacted. Further, the additional charcoal should decrease the release of radioactive gases. Therefore, the probability of creating an accident or malfunction of a type different than previously evaluated is not increased.
- III. No. The margin of safety as described in the bases for Technical Specification 3/4.11 has not been reduced.

SE No.: 91-039

Source Document: MFI 1-90-006

### Description of Change

This Mechanical Foreign Item analyzes the installation of a stainless steel valve disk in Offgas loop seal drain valve 1N64-F031 instead of a nonsparking, brass disk. This is a revision to Safety Evaluation 90-005.

### Summary

- I. No. USAR Section 15.7.1.1.1 addresses the probable consequences of having sparking valve disks (system rupture or filter bed fire). Both are possible results of a hydrogen detonation caused by a sparking valve disk. A hydrogen detonation can only be caused by a hydrogen build-up caused by recombiner failure and the presence of an ignition source. The addition of the stainless valve disk does not alter the probability of a recombiner failure and the subsequent hydrogen build-up. In order to produce a spark the valve must be exposed to air and then stroked. Since the valve is located in a loop seal it will be submerged suppressing any spark. If the loop seal is lost the valve is administratively prohibited from operation, again suppressing any spark. Hence, the addition of this valve disk does not increase the probability of the events necessary to have a hydrogen denotation. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The addition of this valve disk will not impact Technical Specification 3.11, Offsite Release. Therefore, no margin of safety as defined in the bases for Technical Specifications is reduced.



SE No.: 91-040

Source Document: MFI 1-87-387

### Description of Change

This Mechanical Foreign Item analyzes reversing the drain valve controllers on feedheater 6B first and second stage drain tanks. The normal valve controller will operate the alternate valve while the alternate valve controller will operate the normal valve. This is a revision to Safety Evaluation 87-487.

### Summary

- I. No. Controlling the drain valves in this manner will ensure drain tank levels are maintained with the normal operating bands. The MFI does not effect any other drain tank controls or alarms. Failure of the controls could result in a small reduction in feedwater temperature. However, this is bounded by the analysis contained in USAR Chapter 15.1. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This MFI does not adversely impact the Feedwater System. Drain tank levels are maintained in the normal operating band. MFI failure is bounded by analysis contained in USAR Section 15.1. Therefore, the possibility of creating an accident or malfunctions of a type different than previously evaluated does not exist.
- III. No. This MFI does not affect the operation of the Feedwater System. Failure of the MFI is bounded by analysis contained in USAR Chapter 15.1. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-041

Source Document: MFI 1-88-114

Description of Change

This Mechanical Foreign Item analyzes reversing the drain valve controllers on the Feedheater 6A first and second stage drain tanks. The normal valve controller will operate the alternate valve while the alternate valve controller will operate the normal valve. This is a revision to Safety Evaluation 80-367.

Summary

- I. No. Controlling the drain valves in this manner will ensure drain tank levels are maintained within with the normal operating bands. The MFI does not effect any other drain tank controls or alarms. Failure of the controls could result in a small reduction in feedwater temperature. However, this is bounded by the analysis contained in USAR Chapter 15.1. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This MFI does not adversely impact the Feedwater System. Drain tank levels are maintained in the normal operating band. MFI failure is bounded by analysis contained in USAR Section 15.1. Therefore, the possibility of creating an accident or malfunctions of a type different than previously evaluated does not exist.
- III. No. This MFI does not affect the operation of the Feedwater System. Failure of the MFI is bounded by analysis contained in USAR Chapter 15.1. Therefore, no margin of safety as defined in the Rules for Technical Specifications will be reduced.

SE No.: 91-042

Source Document: MFI 1-87-89

### Description of Change

This Mechanical Foreign Item analyzes drain valve resequencing of Feedwater Heater 6A. The normal drain valve controller will operate the alternate drain valve and the alternate drain valve controller will operate the normal drain valve. This is revision to Safety Evaluation 87-489.

### Summary

- I. No. This MFI permits the normal drain valve to be controlled by the alternate level controller. This allows drains to be directed to the condenser until the drain water quality is high enough to allow the drains to be directed to the Feedwater Heater 4. By rerouting the drains to the condenser, a small reduction in final feedwater temperature will occur. However, this reduction is within the reduction evaluated in USAR Section 15.1. This MFI does not affect any other heater controls. A failure of the heater level controls would result in a high level isolation of the heater's extraction steam. This would result in a feedwater temperature reduction of less than 40°F. This is well within the USAR Chapter 15 analysis which assumed a 100°F temperature reduction would occur. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This MFI makes use of installed plant equipment. MFI failure is bound by USAR analysis. No equipment is being added or removed. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This MFI uses plant equipment in compliance with Technical Specifications. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-043

Source Document: DCN 3251, Rev J

Description of Change

This drawing change makes an editorial revision to P&ID 302-641, Residual Heat Removal System, to accurately reflect 1E12-R0608A as a position transmitter rather than a position indicator.

Summary

- I. No. This change corrects a typographical error on the P&ID. This is not a change to the physical plant nor does it affect the operability of the plant. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This is an editorial correction, it does not affect the operation or function of the Residual Heat Removal System. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 90-044

Source Document: DCN 3480, Rev. 0

Description of Change

This drawing change makes an editorial revision to P&ID 302-621, Emergency Closed Cooling (ECC-P42) System, to reflect the actual motor RPI for ECC Pumps 1P42-C001A/B.

Summary

- I. No. This editorial change does not modify the ECC pumps nor alter system performance or function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This drawing change is editorial in nature. No system or component function has been altered. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-045

Source Document: USAR CR 91-045

Description of Change

This evaluation analyzes an editorial change to USAR Figure 6.4-2, Control Room Envelope, which adds the Fire Rating Labels for each of the fire barriers on the drawing.

Summary

- I. No. This change does not in any way change the fire rating of the fire barriers. It only adds a label which describes the fire rating of the barrier. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This editorial change does not reduce the margin of safety as defined in the bases for Technical Specifications.

SE No.: 91-046, 91-095

Source Document: DCN 3393, Rev. 0

### Description of Change

This drawing change revises P&ID 206-009, the Loading and Unloading of Safety Switchgear - Division II, to accurately reflect the load associated with a newly installed Motor Control Center Switchgear Ventilation Motor (OM23-C0018).

### Summary

- I. No. The newly installed motor is a 115 amp, 82.0 kw load as compared to the 116 amp, 80.0 kw load of the old motor. The 2.0 kw increase as documented in Calc. #26133-86-2 is an insignificant addition to the Unit 1 Division 2 diesel load. Thus, with the added 2.0 kw load the diesel generator will continue to operate within its design limits. Therefore, the probability of occurrence or the consequences of an accident or the malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The 1.0 amp decrease as documented in Calc's #431-85-1 and #686-85-3 results in a very small change in the total Unit 1 Division 2 diesel loading. As such, the new motor creates no additional concern for the safe loading/operation of the diesel. Due to the identical nature of the new motor when compared to the old motor, the consequences of motor failure have not changed. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The 2.0 kw load increase is within the postulated diesel load "band" described Technical Specifications 3/4.8.1.1.2.a.5 and f.9. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-047

Source Document: DCN 3474, Rev. 0

Description of Change

This drawing change makes an editorial revision to Architectural Drawing E-013-007, Plant Layout Above EL. 652, which reflects the removal of door CC503.

Summary

- I. No. Door CC503 is not a security door nor a fire rated door. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This editorial change does not reduce the margin of safety as defined in the bases for Technical Specifications.



SE No.: 91-048

Source Document: MFI 1-91-038

Description of Change

This Mechanical Foreign Item will block open the Emergency Service Water Pumphouse Ventilation (M32) System Discharge Damper 1M32-F0708B. This will enable the M32 System to perform its design function while the damper actuator is out of service.

Summary

- I. No. This MFI will maintain the M32 System in a configuration that will ensure it satisfies its design basis. Pumphouse temperature will be maintained by operation of the M32 intake and recirculation dampers. Since pumphouse temperature is being maintained within the design band, there is not impact upon any component or system housed within the pumphouse. Therefore, the probability of occurrence or the consequences of an accident or the malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The design function of the M32 System is to supply cooling to the Emergency Service Water pumps during normal and accident conditions. The cooling function of the M32 System will be maintained through use this MFI and continuous operation of system fans. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This MFI will permit the M32 System to perform its design function as stated above. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-049

Source Document: DCN 3452, Rev. 0

Description of Change

This drawing change revises P&IDs 302-241 and 352-241, Service Air (P51) System, to show a range of flow to reflect the use of two different types of compressor cartridges in the air compressors.

Summary

- I. No. This drawing change will clarify normal load capacity, since the smaller of the two air compressor motors is large enough to drive the larger of the two types of compressor cartridges. System pressures downstream of the receiver tanks have not changed. Hence, the probability of line break has not changed. The change has no impact upon any safety-related system or component. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This drawing change does not impact the instrument air failure evaluated in USAR Section 15.2.10. Air quality and flows downstream of the filters/drivers have not changed. There is no effect on any safety-related component or equipment. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This change does not alter the ANSI class or operating pressure of the P51 System. Further, no information in Technical Specifications has changed. Therefore, the margin of safety as defined in the bases for any Technical Specification will not be reduced.

SE No.: 91-050

Source Document: DCN 3227, Rev. 0

Description of Change

This drawing change makes an editorial change to P&IDs 302-501, TIP System, and 302-686, Suppression Pool Makeup System, to reflect the correct location of transmitter E22-N<sup>o</sup> 3.

Summary

- I. No. This editorial change does not impact the component's reliability or function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previous evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This drawing change is editorial in nature. It only revises the P&IDs to reflect the correct location of the transmitter. There is no impact upon any plant equipment. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-051

Source Document: DCN 3479, Rev. 0

Description of Change

This drawing change modifies P&ID 302-081, Feedwater (N27) System, to reflect the removal of the temporary start-up strainers 1N27-DO06A/B and 1N27-DO07.

Summary

- I. No. These strainers were used for start-up to remove any foreign material that may have accumulated in the N27 System during construction. The strainers were removed after the system reached full flow. The strainers are not required since any foreign material in the N27 System will be removed by the feed pump suction strainers. The removal of the strainers will not effect N27 System integrity or operability. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The removal of the feedwater strainers will not affect system integrity or function. Foreign material that may have entered the N27 System will still be removed by permanently installed strainers. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. These strainers were only intended as temporary start-up strainers and are not addressed in Technical Specifications. N27 System integrity or operability has not been altered. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-052

Source Document: USAR CR 91-025

Description of Change

This evaluation analyzes removal of the reference to NEDP-0202, "Fire Protection Program," from the USAR. The information contained in this procedure has been incorporated into POP-0210, "Fire Protection Program," and NEI-0330, "Interface Reviews and Evaluations."

Summary

- I. No. This change is editorial in nature. NEDP-0202 is referenced as describing the responsibilities within the Nuclear Engineering Department relating to design control for the fire protection systems and safe shutdown analysis. This information has been incorporated into POP-0210 and NEI-0330 which are also referenced in the USAR. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change only affects procedure references. There is no impact on the fire protection program. No equipment important to safety is affected. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This change only affects references to procedures of the Fire Protection Program. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-053

Source Document: USAR CR 91-046

### Description of Change

This evaluation analyzes changing the cable standard used to govern large power cables (#4 AWG and larger) from IPCEA P-46-426 to ICEA P-54-440. Reference FSAR CR 85-303.

### Summary

- I. No. Engineering calculations for the class 1E system are based upon the ICEA P-54-440 standard. An editorial error was made in the FSAR which listed the standard as IPCEA P-46-426 instead of the ICEA standard. Hence, this change is only an editorial correction. No physical change is being made to the plant or its design. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The margin of safety included in the Technical Specification bases and NUREG 0287 for the safe operation of the electrical power system is not based on specific ampacity ratings for a given size power cable. As stated above, the power cables are designed to ICEA P-54-440. The ICEA standard is more conservative than the IPCEA standard. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-054

Source Document: DCP 89-010A, Rev. 0

Description of Change

This design change installs a pressure regulator in the Service Air System piping associated with the Reactor Water Cleanup (RWCU) System Filter/Demineralizers.

Summary

- I. No. This design change installs a pressure regulator in the Service Air System piping associated with the RWCU Filter/Demineralizers. The pressure regulator ensures sufficient air pressure exists for purging the filter/demineralizers during backwash cycles. The regulator is installed in nonsafety-related piping. The RWCU filter/demineralizers are nonsafety-related. These portions of the RWCU System and Service Air System are not required for accident mitigation. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This design only impacts nonsafety-related systems and components. Accident analysis is not impacted. Therefore, the possibility of creating an accident or malfunction of a type different than previously evaluated does not exist.
- III. No. As stated above, sufficient air pressure will be maintained during the backwash cycle. Therefore, the margin of safety as defined in Technical Specification 3/4.4.4 is maintained.

SE No.: 91-055

Source Document: DCP 89-126, Rev. 0

Description of Change

This design change re-engraves six control room annunciator windows associated with the standby diesel generators. Specifically, the windows will reflect fuel oil strainer differential pressure instead of filter differential pressure.

Summary

- I. No. The annunciator windows are being re-engraved to have the alarm wording in agreement with plant equipment. The diesel fuel transfer pump strainer differential pressure alarms are nonsafety and are used for operator information only. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The annunciators and alarms are nonsafety. The window rewording cannot cause a plant malfunction. Therefore, the possibility of an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This change has no impact on any of the bases for Technical Specifications. Therefore, no margin of safety will be reduced.



SE No.: 91-056

Source Document: DCP 91-089, Rev. 0  
SCN-318-DSP-B33-1-4549-00

Description of Change

This design change removes the bonnet vent lines and valves for the Reactor Recirculation (B33) pump suction and discharge isolation valves.

Summary

- I. No. This change removes the bonnet vent connections for the B33 pump suction and discharge isolation valves. The connections will be plugged in accordance with ASME standards. Failure of the plugs are bounded by the loss of coolant accident as described in USAR Chapter 15. Therefore, the probability of occurrence or the consequences of an accident or the malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The pressure retaining capability will be maintained. Drywell unidentified leakage is unaffected. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-057

Source Document: FPI-OIB, Rev. 2  
FPI-OFH, Rev. 2

### Description of Change

This evaluation analyzes changes made to Pre-Fire Plan Instructions FPI-OIB and FPI-OFH. The changes for FPI-OIB include the addition/elimination of flammable storage cabinets in several areas and the storage of flammable material in a specific location. The changes for FPI-OFH include the designation of equipment storage areas in several locations.

### Summary

- I. No. All changes were found to be consistent with the Fire Protection requirements with respect to the USAR and its sub-tier documents. The changes are an improvement to the Fire Protection Pre-Fire Plan Instructions. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The changes made to Pre-Fire Plan Instructions do not involve any activity described in Technical Specifications. Therefore, the margin of safety as defined in the bases for any Technical Specifications will not be reduced.

SE No.: 91-058

Source Document:

DCP 91-086A, Rev. 0

### Description of Change

This design change installs electrical interlocks to pick-up and hold the closing coil of the Division 2 Standby Diesel Generator field breaker contactor "K1". This will minimize the arcing of the coil.

### Summary

- I. No. The installation of the new safety-related relay contacts in parallel with the mechanical-latch has been successfully proven. The interlocks are electrically holding the contactor "K1" in the closed position at the start and during the entire engine run. In the event of a mechanical-latch failure, the new interlocks will keep the contactor in the required position. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This new installation will not increase the probability of a malfunction within the control circuitry of the Division 2 Diesel Generator. The safety-related interlocks will reduce the possibility of failure of field flashing and/or field closing, as the interlocks are acting in parallel with the mechanical-latch. The physical installation of the component and the associated wiring is in accordance with the original installation requirements. This change creates no reduction of redundancy or component performance levels compared to the original design. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The reliability of the Division 2 Diesel Generator is not compromised by this design change. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-059

Source Document: DCP 91-086, Rev. 0

Description of Change

This design change installs electrical interlocks to pick-up and hold the closing coil of the Division 1 Standby Diesel Generator field breaker contactor "K1". This will minimize the arcing of the coil.

Summary

- I. No. The installation of the new safety-related relay contacts in parallel with the mechanical-latch has been successfully proven. The interlocks are electrically holding the contactor "K1" in the closed position at the start and during the entire engine run. In the event of a mechanical-latch failure, the new interlocks will keep the contactor in the required position. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This new installation will not increase the probability of a malfunction within the control circuitry of the Division 1 Diesel Generator. The safety-related interlocks will reduce the possibility of failure of field flashing and/or field closing, as the interlocks are acting in parallel with the mechanical-latch. The physical installation of the component and the associated wiring is in accordance with the original installation requirements. This change creates no reduction of redundancy or component performance levels compared to the original design. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The reliability of the Division 1 Diesel Generator is not compromised by this design change. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-060

Source Document: PSTG, Rev. 1

### Description of Change

This evaluation analyzes the incorporation of the BWR Owner's Group Emergency Procedure Guidelines (EPG) Rev. 4 and the Hydrogen Control Owners' Group (HCOG) Combustible Gas Control Guidelines Rev. 3 into the Perry Specific Technical Guidelines (PSTG) Rev. 1. The PSTG forms the basis for the Perry Emergency Instructions (PEI).

### Summary

- I. No. The PSTG is the document which implements the EPG and HCOG guidelines. Both of these guidelines were reviewed and approved by the NRC. The guidelines are symptom based and are used to aid in the mitigation of emergency events. In general, use of these guidelines do not impact the overall plant design or function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. The EPG and HCOG guidelines which form the basis of the PSTG are approved by the NRC. The guidelines are symptom based so the consequences associated with event misdiagnosis is minimized. The systems/components used to perform the activities described in the PSTG are not being modified in a manner for which they are not designed for. All PSTG activities are administratively controlled so that they will only be used for emergency event mitigation. Therefore, the possibility of creating an accident or malfunction of a type different than evaluated does not exist.
- III. No. The EPG and HCOG guidelines are approved by the NRC. The PSTG is administratively controlled for emergency event mitigation only. In general, use of the guidelines do not impact the overall plant design or function. Therefore, no margin of safety will be reduced.

SE No.: 91-061

Source Document: USAR CR 91-057  
DCP 87-0357, Rev. 0

### Description of Change

This evaluation analyzes changes made to USAR Figure 9.1-27, Reactor Refueling Floor - Laydown Study, which incorporates the blade guide storage rack on the wall of the containment fuel storage pool.

### Summary

- I. No. The design and construction of the rack itself is in accordance with the applicable codes and standards. The blade guide racks do not impact the accident or transient analyses contained in the USAR. Further, the load handling equipment involved with moving the blade guides is not affected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The blade guide storage rack does not affect any equipment or system important to safety. Accident analysis has not been affected. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The Refueling Technical Specifications are not impacted by this change. Additionally, the racks are designed to preclude failure during all postulated loading conditions described in the USAR. Therefore, no margin of safety will be reduced.

SE No.: 91-062

Source Document: SOI-B33, Rev. 3, TC-17

### Description of Change

This change incorporates into System Operating Instruction (SOI-B33) GE recommendations for zero Reactor Recirculation (B33) pump seal purge flow.

### Summary

- I. No. Zero purge flow is the original design basis for the B33 pumps. Byron Jackson, the pump manufacturer, concurs that pump operation with zero (or reduced) seal purge flow is within the design bases for the pump pressure boundary. Potential B33 seal failure is bounded by the analysis contained in USAR Section 15.6.5. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. Zero purge flow may lead to increased B33 seal wear. This increased wear may lead to increased leakage through the seals. To offset this, the B33 pumps use a two seal cartridge with each individual seal designed for pump operating pressure. The seals are individually monitored for leakage. Seal failure is bounded by analysis contained in USAR Section 15.6.5. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Reactor Recirculation pump seal purge flow does not enter directly or indirectly into any margin of safety as defined in the bases for Technical Specifications. Drywell identified leakage may change slightly due to eliminating seal purge flow. However, since B33 seal leak off remains as identified leakage, is collected and monitored as before, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-064  
Source Document: PCR 15136

Description of Change

This evaluation analyzes the temporary installation of a freeze plug in the Turbine Building Closed Cooling (P44) System, upstream of 1P44-F0626C.

Summary

- I. No. The installation of the freeze plug will permit inspection and repair of 1P44-F0626C. The P44 System is not required for safe shutdown. Freeze plug failure will not create a flooding hazard since flow can be isolated by manual isolation valves. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The P44 System is nonsafety-related and is not required for the safe shutdown of the reactor. Should the freeze plug fail the leakage can be isolated. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The freeze plug operation and its postulated failure does not affect any safety-related system. Therefore, no margin of safety as defined in the bases for Technical Specification will be reduced.



SE No.: 91-065

Source Document: DCP 90-043, Rev. 0

### Description of Change

This design change will provide two modes of operation for the Control Room Simulator communication devices.

### Summary

- I. No. This design change modifies a nonsafety communications system. This system is not interconnected with any safety-related system. The design basis for the plant communications systems are maintained. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This modification does not impact any communications systems described in Technical Specifications. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-066

Source Document: DCP 88-252, Rev. 0

### Description of Change

This design change constructs a work enclosure on top of the Auxiliary Building roof. The enclosure will be used when performing maintenance on the Main Steam Isolation Valves (MSIV).

### Summary

- I. No. The MSIV enclosure is nonsafety-related. It is designed in accordance with approved codes/standards. Analysis indicates that it will not be a missile hazard. The Auxiliary Building roof has been analyzed and is capable of withstanding the additional loading of the enclosure. The enclosure is not required to be nor is designed to be a radiation boundary. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. See Item I above.
- III. No. The enclosure has been designed to prevent the creation of missile hazards. The structural integrity of the Auxiliary Building has not been affected. The change is consistent with Technical Specifications 3/4.6.1.5 and 3/4.6.6. Therefore, no margins of safety have been reduced.

SE No.: 91-067

Source Document: OM16F Physical Security Plan, Rev. 15, TC-2

Description of Change

Revision 15, TC-2 of OM16F, Physical Security Plan, has been evaluated to ensure that the effectiveness of the Perry Nuclear Power Plant Security Plan has not been reduced and to ensure that these changes meet the requirements of 10 CFR 73, Physical Protection of Plants and Materials. Site Protection must be contacted for further details since this is considered "SAFEGUARDS" information.

Summary

- I. No. OM16F describes the comprehensive Physical Security Program and therefore, does not affect the occurrence or consequences of an accident or malfunction of equipment.
- II. No. OM16F does not direct the operation of plant systems or equipment and, therefore, does not create the possibility for an accident or malfunction.
- III. No. OM16F does not reduce the margin of safety as defined in the bases for any Technical Specifications.

SE No.: 91-068

Source Document: NR 91-N-043, Rev. 0

### Description of Change

This evaluation analyzes the use-as-is disposition of the Condensate Filtration (N23) System septa filter element tube sheets. Traceability of the tube sheets (ASME origin) was lost during performance of DCPs 87-464 and 90-196. The septa filter element tube sheets were transferred between filter vessels without adequately tracking the origin.

### Summary

- I. No. The septa filter element tube sheet components are stainless steel SA-240, type 304 and are identical for each filter vessel. Transferring the tube sheets between vessels has no effect upon the vessel or its code classification. The design or operation of the N23 System has not been impacted. Hence, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. Tube sheet components are all identical and are acceptable for use in any of the N23 filter vessels. Loss of traceability on the tube sheets does not affect the design or operation of the vessels. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The N23 System is nonsafety-related. The design or operation of the N23 System has not been affected. Reactor water chemistry has not been impacted. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-069

Source Document: SCR 1-91-1061 through 1069

Description of Change

This evaluation analyzes various setpoint changes made to the Division 1 and 2 Standby Diesel Generator (DG) Fuel Oil System day tank level switches.

Summary

- I. No. The setpoint changes made do not physically alter any installed equipment nor do they adversely effect DG function or reliability. DG day tank level operating margins have not been impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction previously evaluated in the USAR is not increased.
- II. No. The setpoint changes do not adversely effect the DG control system. DG function and response have not been impacted. Day tank level operating margins have been maintained. The performance and function of the original design have been maintained. Therefore, the possibility of creating an accident or malfunction of equipment of a different type than evaluated does not exist.
- III. No. The setpoint changes do not adversely effect the function or operation of the DG. As such, Technical Specification 3/4.8 dealing with the onsite power supplies has not been impacted. Therefore, no margin of safety as described in the bases for Technical Specifications is reduced.

SE No.: 91-070

Source Document: PAP-1107, Rev. 4

### Description of Change

This change revises PAP-1107, "Temporary Instructions and Special Test Instructions," to include combining the temporary instruction and the special test instruction into one instruction type and extending the effective duration to eighteen months.

### Summary

- I. No. The change is editorial. The procedure combines the two instruction types to improve efficiency. All administrative controls will be maintained. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The change is administrative in nature. It does not affect equipment important to safety. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The change is editorial. No administrative controls specified in Technical Specifications are affected. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-071

Source Document: DCP 90-128, Rev. 0

Description of Change

This design change eliminates cross-ties between the Potable Water (P71) System and the Fire Protection (P54) System, the Cooling Tower Chlorination (P84A) System and the Plant Discharge Dechlorination (P84B) System. The cross-ties are presently unused and unnecessary for plant operation. (Mechanical Evaluation)

Summary

- I. No. The P71 System is nonsafety-related. It does not impact accident analysis. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The P71 System is not addressed in any Technical Specification. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-072

Source Document: DCP 90-128, Rev. 0

### Description of Change

This design change eliminates cross-ties between the Potable Water (P71) System and the Fire Protection (P54) System. The cross-tie is presently unused and unnecessary for plant operation. (Fire Protection Evaluation)

### Summary

- I. No. The cross-connection was provided for a backup to the construction fire pump before the permanent plant pumps were available. The permanent plant Fire Protection System is independent of the potable water supply and removal of the connections will not degrade the water supply to any plant Fire Protection System. Operation of the Fire Protection System is not affected. Therefore the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The change only impacts the Fire Protection System piping and is not functionally related to any known failure mechanism for plant features important to safety. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The P71 System is not addressed in Technical Specifications. The Fire Protection System is not adversely impacted by the change. Therefore, no margin of safety as defined in the bases for any Technical Specifications will be reduced.



SE No.: 91-073

Source Document: PAF-1919, Rev. 1, TC-2

Description of Change

This change revises PAF-1919, "Fire Brigade Stations and Equipment", by deleting the emergency garage as a Fire Brigade Station.

Summary

- I. No. This change is administrative in nature. The Fire/Security Inspection Unit is now located within the Protected Area. No benefit exists for having equipment stored in a location outside of the Protected Area. The change is consistent with the Fire Protection Plan. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change is administrative in nature. It is consistent with the Fire Protection Program requirements described in Technical Specifications. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-074

Source Document: PAP-0507, Rev. 8, TC-8  
PAP-0401, Rev. 1, TC-3

Description of Change

This change revises PAP-0507, "Preparation, Review, and Approval of Instructions", and PAP-0401, "Administrating Control of the Materials Control Program". The changes include altering the responsibility for the preparation of Material Controls Instructions and adding the Engineering Project Support and Emergency Planning Sections as entities for the preparation of various instruction types.

Summary

- I. No. This change is administrative in nature. Administrative controls for instruction preparation are being maintained. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment ~~is not~~ safety previously evaluated in the USAR is not increase.
- II. No. See Item I above.
- III. No. No administrative controls specified in Technical Specifications are affected. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-075

Source Document: PAP-1916, Rev. 4

Description of Change

This change revises PAP-1916, "Duties of the Firewatch", to clarify the utilization of fire watches.

Summary

- I. No. The changes made in this procedure are administrative in nature and relate only to the compensatory actions taken in respect to fire protection requirements. The changes are consistent with all NRC and NFPA guidelines relating to the fire watch activity. These changes have no effect on system operability or system design. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change is consistent with the Fire Protection Program requirements described in Technical Specifications. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-076

Source Document: DCP 90-288A, Rev. 0

Description of Change

This design change installs lighting enhancements in the Control Complex and the Divisional 3 Diesel Generator Room.

Summary

- I. No. This change installs lighting enhancements which operate on 208 VAC. The power supply for this lighting is nonsafety-related. The system is designed for this voltage. The installation meets all applicable codes and standards. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated in the USAR is not increased.
- II. No. The lighting system is designed for this voltage level and its installation meets applicable codes and standards. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This lighting enhancement combined with the use of nonsafety-related 208 VAC will have no adverse effect upon the plant. Hence, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-077

Source Document: OM15A Emergency Plan for PNPP, Rev. 10, TC-2

Description of Change

This evaluation analyzes changes made to Rev. 10 of OM15A, Emergency Plan for PNPP. The changes are derived from comments made by the State of Ohio and local county Emergency Management Agencies as part of their annual review of the Perry Emergency Plan and Emergency Action Levels (EAL) in accordance with Appendix E (IV.B) of 10 CFR 50.

Summary

- I. No. The proposed changes are administrative in nature. The changes do not effect or direct the operation of plant systems, equipment, or components. The changes does not affect previously evaluated accidents. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. These changes are administrative in nature and do not effect or direct the operation, equipment or components. The change does not affect previously evaluated accidents. Therefore, no margin of safety defined in the bases for Technical Specifications will be reduced.

SE No.: 91-078

Source Document: SCN 313-ISS-2000, Rev. 0

### Description of Change

This evaluation analyzes a change to the pipe line specification. The present pipe line spec L6-4 requires use of Yoloy piping. It is being replaced with K24-6. The scope of this evaluation entails the buried L6-4 piping with the Makeup Water Pretreatment (P20) System.

### Summary

- I. No. The P20 System is nonsafety and nonseismic. The replacement of the L6-4 piping with K24-6 does not impact the function, operability, or integrity of the P20 System. Failure of P20 does not impact accident analysis. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The P20 System is nonsafety. System function or operability has not been impacted. Accident analysis is not affected. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The P20 System is not addressed by Technical Specifications. There is no impact upon reactor water chemistry. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-079

Source Document: FPI-1AB, Rev. 0  
FPI-1AX, Rev. 1

Description of Change

This evaluation analyzes changes made to Pre-Fire Plan Instruction FPI-1AB. The changes incorporate plant modifications affecting the characteristics of Auxiliary Building fire areas. Additionally, Pre-Fire Plan Instruction FPI-1AX was cancelled. The contents of the plan were incorporated into FPI-1AB.

Summary

- I. No. All changes were found to be consistent with the Fire Protection requirements with respect to the USAR and its sub-tier documents. The changes are an improvement to the Fire Protection Pre-Fire Plan Instructions. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The changes made to the Pre-Fire Plan Instructions do not involve any activity described in Technical Specifications. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-080

Source Document: PTI-C11-P0006, Rev. 0

### Description of Change

This change modifies the Periodic Test Instruction for the Control Rod Drive Hydraulic System (PTI-C11-P0006) to permit operation of the Control Rod Drive (CRDH) Hydraulic pump with the minimum flow valve 1C11-F015A/B closed.

### Summary

- I. No. The CRDH pump is nonsafety. A full capacity redundant pump is available should a pump failure occur. To prevent pump overheating a precaution is included in the instruction to warn operators of the possibility of deadheading the pump if a downstream isolation valve is shut when the minimum flow valve is shut. The CRD pumps are not required for accident mitigation. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. Failure of a CRD pump does not adversely impact any safety or nonsafety equipment. A fully redundant backup pump is available to support operations should a failure occur. The CRD pumps are not relied upon for accident mitigation. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. Technical Specifications describes CRD pump operation but is based upon inoperable SCRAM accumulators. Since all accumulators have a check valve which prevents depressurization should a CRD pump fail the margin of safety as defined in the bases for the Technical Specifications will not be reduced.



SE No.: 91-081  
Source Document: DCN 3551, Rev. 0  
USAR CR 91-069

Description of Change

This drawing change revises P&ID 206-051, Reactor Core Isolation Cooling (E51) System, to show the installed power cable size for 1E51-F0045 as number 8.

Summary

- I. No. This change is a editorial in nature. No change is being made to the plant. Operability of 1E51-F0045 has not been impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change is editorial only. The E51 System design or operation has not been impacted. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-082

Source Document: PAP-1912, Rev. 4

#### Description of Change

This change revises PAP-1912, "Burn Permits for Ignition Sources". Changes include clarifying areas that require the use of a Burn Permit and establishing field control to prohibit accidents from occurring.

#### Summary

- I. No. This change is administrative in nature. The changes were found to be consistent with the NFPA guidelines and the Fire Protection requirements with respect to the USAR and its sub-tier documents. The changes do not alter any system or component. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The changes described above are administrative in nature. Plant system design or operability have not been impacted. The changes are consistent with NRC and NFPA guidelines. Therefore, the possibility of creating an accident or malfunction of a type different than previously evaluated does not exist.
- III. No. This change is administrative in nature. It does not impact any activity described in Technical Specifications. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-083

Source Document: DCN 3546, Rev. 0

Description of Change

This drawing change revises Rosemont Vendor Drawing 4549-44-456-4 to permit the use of upgraded Rosemont Model 1153 transmitters.

Summary

- I. No. The upgraded Rosemont transmitters possess improved radiation resistance characteristics and is less susceptible to loss-of-fill-oil events. The transmitter is also less susceptible to "level ringing" phenomenon. The use of the new transmitter in place of the old transmitter will not adversely impact overall system function or operation. Instrument response times have not been altered. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. See Item I above.
- III. No. As stated above, instrument response time has not been affected. The change is consistent with Technical Specifications 3/4.3.2 and 3/4.3.3. Therefore, no margin of safety will be reduced.

SE No.: 91-084

Source Document: TXI-121, Rev. 0

### Description of Change

This evaluation analyzes the performance of the activities associated with the chemical decontamination of the Reactor Recirculation (B33) pump impeller assemblies in the Fuel Handling Building (FHB).

### Summary

- I. No. The activities associated with the chemical decontamination of the B33 impellers are similar to those already evaluated and being performed. The process will be administratively controlled. The design/function of the FHB will not be adversely affected by the performed of this activity. The decon equipment being used or its failure will not impact any safety-related system or component. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. See Item I above.
- III. No. This activity does not affect any radioactive effluent, its monitoring, or its processing. The activity is consistent with Technical Specification 3/4.11. Therefore, no margins of safety have been reduced.

SE No.: 91-086

Source Document: DCP 90-289, Rev. 0

### Description of Change

This design change replaces Offgas (N64) System globe valves 1N64-F119A/B with ball valves.

### Summary

- I. No. The installation of a ball valve will eliminate the trapping of debris which will result in a decreased potential for valve leakage. In addition, the new valves have softer seats which will further improve leak tightness. The new valves do not adversely impact the N64 rupture analysis described in USAR Section 15.7. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. As stated above this design change will increase the leak tightness of the loop seals where the valves are used. Changing valve type does not affect N64 System design nor leakage of radioactive gases from the N64 System. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This change will not affect the operation of the N64 System. The basis for Technical Specification 3/4.11.2 has not been altered. Therefore, no margin of safety will be reduced.

SE No.: 91-087

Source Document: DCN 3536, Rev. 0

Description of Change

This drawing change revises P&ID 302-686, Suppression Pool Makeup (G43-SPMU) System, by deleting the flange end and reference elevation at the discharge of each SPMU line to the Suppression Pool.

Summary

- I. No. This drawing change has no physical impact upon the SPMU System. SPMU function or performance has not been altered. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change does not impact SPMU system function or performance. Therefore, no margin of safety as defined in the bases for Technical Specification will be reduced.

SE No.: 91-088

Source Document: DCN 90-153, Rev. 0  
NR 90-S-060, Rev. 0

### Description of Change

This design change installs air pressure reducers/regulators in the instrument air supply lines to the containment airlock inflatable seals.

### Summary

- I. No. This change reduces the air supply pressure to the airlock inflatable seals. The seal evaluation contained in NR 90-S-060 indicates that reduced supply pressure will increase seal life. Airlock operability is not affected by this pressure reduction. The loss of instrument air accident, USAR Section 15.2.10, is not adversely impacted by this modification. No other accident analyses are impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. A seal evaluation indicates that seal life will be extended. Air lock operability has not been affected. The loss of instrument air accident analysis is unaltered. Containment design and operation is not impacted. Leakage past the seals is processed, as designed, by the Annulus Exhaust Gas Treatment System. Therefore, the probability of creating an accident or malfunction of a type different than previously evaluated does not exist.
- III. No. Airlock operability has not been affected. The change is consistent with Technical Specification 3/4.6.1.3. Therefore, no margin of safety as defined in the bases for Technical Specification is reduced.

SE No.: 91-089

Source Document: DCP 88-378, Rev. 0

### Description of Change

This design change installs level instrumentation in the Building Heating (P55) System Hot Water Heat Exchanger 1P55-B001A.

### Summary

- I. No. This design change utilizes the instrument air signal from an existing level transmitter. The new level indicator provides local indication only. It does not perform any control function. The operability of the P55 System is not affected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This design change does not impact equipment required for safe shutdown. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The function of the P55 System has not been affected. Further the P55 System is not addressed in the Technical Specifications. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.



SE No.: 91-090

Source Document: DCP 91-042, Rev. 0

Description of Change

This design change install a low-low level alarm and a regeneration interlock to the Makeup Wa. Pretreatment (P20) System clearwell pump trip logic.

Summary

- I. No. The low-low level alarm and the regeneration interlock will enhance the existing annunciation and control logic. The probability of reaching the point of inadequate clearwell water level is reduced by this modification. The regeneration interlock will ensure that proper regeneration will occur which improves the performance of the demineralizer resin. The pretreatment and demineralized water systems are nonsafety. Accident analysis is not impacted. Therefore, the probability or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II No. The P20 System is nonsafety-related and is not required for safe shutdown. Therefore, the possibility for creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The P20 System is nonsafety-related and does not supply water to systems important to safety. The addition of the low-low level alarm and the regeneration interlock is consistent with the P20 design. Accident analysis is not impacted. Therefore, the margins of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-091

Source Document: DCP 89-146, Rev. 0

### Description of Change

This design change extends the Turbine Generator hydrogen cooler waterbox vent lines. Extending these vent lines improves access for venting purposes.

### Summary

- I. No. This modification does not alter the Turbine Building Closed Cooling (P44) System or Turbine Generator hydrogen cooler operation or reliability. The P44 System is not required for safe shutdown. The line extensions will be installed in accordance with approved codes and standards. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in USAR is not increased.
- II. No. The vent line extensions are less than one-inch in diameter and are outside of the scope of moderate energy line break analyses. P44 System and hydrogen cooler operation or function is not impacted. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The overall design of the P44 System remains unaffected. The function of hydrogen cooler waterbox vents remains unchanged. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-092

Source Document: OM15A Emergency Plan for PNPP, Rev. 10, TC-3

### Description of Change

This evaluation analyzes changes made to OM15A, Emergency Plan for PNPP. The changes are derived from modifications made to the Plant Emergency Instructions (PEI).

### Summary

- I. No. The proposed changes are administrative in nature. The changes do not affect or direct the operation of any plant system, equipment, or component. The changes do not affect previously evaluated USAR accidents. The effectiveness of the Emergency Plan has not been reduced per 10CFR50.54(q). Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. These changes are administrative in nature and do not affect or direct the operation of any equipment or components. The effectiveness of the Emergency Plan has not been reduced for 10CFR50.54(q). Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-093, 91-094

Source Document: DCP 90-207, Rev. 0  
SCR 1-91-1201

### Description of Change

This design change removes a flow orifice and disconnects the associated flow controls in the Back-up Hydrogen Purge Line of the Combustible Gas Control (M51) System. (Mechanical and Instrument Control evaluations)

### Summary

- I. No. This design change will result in a higher flow through the back-up purge line to the Annulus Exhaust Gas Treatment (AEGTS-M15) System. This change in flow will not affect the M15 System design or operation. There is no adverse impact upon the operation of the M51 System. A back-up means of containment hydrogen control will be through the use of the Fuel Pool Cooling and Cleanup (FPCC) System. Accident analysis is not affected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change does not adversely impact the operability of the M51 and M15 Systems. An acceptable back-up method of hydrogen control using the FPCC System is in place. Equipment protection against a hydrogen explosion is not compromised. Therefore, the possibility of creating an accident or a malfunction of a type different than evaluated does not exist.
- III. No. The M51 System continues to satisfy the requirements of Reg. Guide 1.7. Radiological doses remain within the requirements of 10CFR100 Guidelines. M51 and M15 System operability have not been adversely impacted. Equipment protection against a hydrogen explosion has not been compromised. Hence, no margin of safety has been reduced.

SE No.: 91-096

Source Document:

PAP-0110, Rev. 4

USAR CR 91-067

Description of Change

This change revises PAP-0110, "Shift Staffing and Overtime", to include redefining the Horseshoe Area and renaming the Surveillance Area as the Operations Area.

Summary

- I. No. During normal operation the operator at the controls remains in the Horseshoe Area. In the event of an emergency affecting the safety of operations, the operator at the controls may enter the Operations Area. This change is consistent with guidance provided in Regulatory Guide 1.114, "Guidance on Being Operator at The Controls of a Nuclear Power Plant." Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change is administrative in nature and does not reduce the margin of safety as defined in the bases for any Technical Specification.

SE No.: 91-097

Source Document: MFI 1-91-051

### Description of Change

This Mechanical Foreign Item analyzes the installation of temporary stainless steel tubing and fittings into the sample lines of the Condensate Filter (N23) System. These connections will support performance testing of the condensate filters.

### Summary

- I. No. This Mechanical Foreign Item permits performance monitoring for the N23 System. The N23 System is not required for safe shutdown. Sample line failure will not create a flooding hazard in excess of that already analyzed. The sample water will be sent to the Radwaste System for processing. This is consistent with the existing N23 and Radwaste designs. The design of the MFI components exceeds the design requirements associated with the original design. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. This MFI exceeds the design requirements of the original installation. Failure will not create a flooding hazard. The use of this sampling station will not result in increased plant radiation levels. All sample water will be treated by the Radwaste System. The N23 System is nonsafety. Its failure will not compromise any safety-related system or component. Therefore, the possibility of creating an accident or malfunction of a type different than previously evaluated does not exist.
- III. No. The N23 System is nonsafety and its failure does not impact safe shutdown. Therefore, the margins of safety as defined in the bases for Technical Specifications is not reduced.

SE No.: 91-098

Source Document: MFI 1-87-326

### Description of Change

This evaluation analyzes the Mechanical Foreign Item which removes Main Steam Valve 1N11-F503A and Pressure Test Point 1N11-R415A and installs a pipe cap on the pipe nipple.

### Summary

- I. No. The valve and test point was to be used during ASME turbine acceptance testing. It is not required during normal operation. The new configuration conforms to ANSI/ASME B31.1. Failure of the connection is bounded by the analysis in USAR Section 15.6.4, Steam System Piping Break. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The configuration resulting from the removal of 1N11-F503A and pressure test point 1N11-R415A conforms with ANSI/ASME B31.1. Failure of the configuration is bounded by USAR 15.6.4. Therefore, the possibility for creating an accident/malfunction of a different type than evaluated previously within the USAR does not exist.
- III. No. The removal of 1N11-F503A and 1N11-R415A does not impact the integrity of the Main Steam System. System configuration conforms with ANSI/ASME B31.1. Therefore, no margin of safety as described in the basis for Technical Specifications will be reduced.

SE No.: 91-099

Source Document: LL&JED 1-90-136

Description of Change

This evaluation analyzes installation of a jumper to silence the Fuel Handling Evacuation Alarm while performing maintenance on Motor Control Center (MCC) F1C08.

Summary

- I. No. Maintenance on MCC F1C08 requires that the Fuel Handling Building Ventilation Radiation Monitor OD17-K710 be placed in a tripped condition per Technical Specifications. This will activate the Fuel Handling Building Evacuation Alarm continuously while the maintenance is in progress. The tripped radiation monitor and the continuous evacuation alarm would provide no useful information regarding the radiological conditions. Grab samples will be taken at least once every 24 hours in accordance with Technical Specifications. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. Technical Specification 3/4.3.7.1 requires grab samples to be taken when OD17-K710 is out of service. Since this specification is satisfied, the margin of safety will not be reduced.



SE No.: 91-101

Source Document: DCP 88-307 Rev. 0

Description of Change

This design change adds sight flow indicators to all Emergency Service Water (P45-ESW) System pump cooling lines.

Summary

- I. No. The flow indicators are installed in accordance with ASME Section III subsection ND-2610. The pressure retaining capability of the indicators satisfies the ESW design criteria. Failure of the indicators cannot stop cooling water flow to the ESW pumps. The performance or availability of the ESW System has not been degraded. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety is not increased.
- II. No. The change does not adversely impact the design or operation of the ESW System. Indicator failure cannot stop cooling water flow to the ESW pumps. Cooling line rupture is bounded by pipe break analysis for the ESW Pumphouse. Therefore, the possibility of creating an accident or malfunction of equipment of a type different than evaluated does not exist.
- III. No. The design or operation of the ESW System has not been affected. There is no impact upon the Technical Specifications. Therefore, no margin of safety has been reduced.

SE No.: 91-102

Source Document: DCP 90-109, Rev. 3

Description of Change

This design change modifies an architectural change made to the 599' level of the Control Complex. Specifically, the Chemistry office is being enlarged, a Respirator Issue room is being added, and several offices and storage areas are being renovated. (Civil evaluation)

Summary

- I. No. These architectural changes are incidental to the arrangement of the 599' level of the Control Complex. These changes will not have any effect on equipment that is important to the safe operation of the plant. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. The architectural features of the 599' level of Control Complex are not addressed in the Technical specifications. Therefore, no margin of safety as defined in the bases for Technical Specifications is reduced.

SE No.: 91-103

Source Document: USAR CR 91-070

Description of Change

This evaluation analyzes replacing General Electric Vendor drawings with PNPP specific drawings 808-302, sheets 1-3, Reactor Protection (C71) System. Both drawing sets reflect the same configuration and information.

Summary

- I. No. This is an administrative change to the USAR. This change does not change the configuration, function or performance of the C71 System. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This is an administrative change. C71 System configuration, function, or performance have not been altered. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-105, 91-106

Source Document: DCP 91-028A, Rev. 0

### Description of Change

This design change disengages the toxic gas monitors/detectors/alarms and interlocks from the Control Room Ventilation (M25/26) System.  
(Mechanical Evaluation and Fire Protection Evaluation)

### Summary

- I. No. The design of the toxic gas monitoring equipment is to protect control room operators against the accidental offsite release of chlorine and ethylene oxide gases. Analysis indicates (reference Calc. 5.6.1, Rev. 3) that this is not a credible event per NUREG-0800, Section 2.2.3. Hence, toxic gas protection is not required. Disengagement of the toxic gas monitors does not impact the M25/26 System's ability to protect control room operators against other events such as fire, LOOP, LOCA, or high radiation. Additionally, this change does not impact the ability of M25/26 to perform its safe shutdown functions. Further, control room in-leakage, ventilation air flows, and M25/26 filter efficiencies will not be changed. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated in the USAR is not increased.
- II. No. This change does not impact the ability of M25/26 to protect personnel against analyzed events such as fire, LOOP, LOCA, or high radiation. The safe shutdown capabilities of the M25/26 System have not been altered. Further, control room in-leakage, ventilation air flows, and M25/26 filter efficiencies will not be changed. Therefore, the possibility of creating an accident or malfunction of a type different than evaluated does not exist.
- III. No. Control room habitability will be maintained as described in Technical Specifications 3/4.7-3 through 3/4.7-5. M25/26 System operation has not been adversely impacted. There is no impact upon the Fire Protection Program described in Technical Specifications. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-107

Source Document: DCN 3162, Rev. 0  
USAR CR 91-086

### Description of Change

This drawing change updates various Neutron Monitoring (C51) System drawings based on the results of drawing reconciliation program with General Electric. Changes provide clarifying information about PNPP's existing design or add administrative data concerning the reconciliation program.

### Summary

- I. No. These changes are editorial and do not change the design configuration of the C51 System. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. These changes are editorial and have no physical impact on the C51 System. Therefore, no margin of safety as defined in the bases for Technical Specification will be reduced.

SE No.: 91-108

Source Document: DOSEPROJ, Rev. 3

### Description of Change

This evaluation analyzes revisions to the DOSEPROJ program. This program is a PC based computer program used to calculate the radiological impacts of potential plant emergencies.

### Summary

- I. No. DOSEPROJ is a computer program which uses plant radiological and meteorological parameters to provide a prediction as to the radiological impact of a potential plant emergency. This program does not adversely impact any plant system or its operation. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. DOSEPROJ merely utilizes data from plant equipment and in no way impacts plant systems. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. DOSEPROJ program simply utilizes plant data for calculation purposes only. Therefore, no margin of safety will not be reduced.

SE No.: 91-109

Source Document: PAP-1912, Rev. 4, TC-1  
PAP-1916, Rev. 4, TC-1

Description of Change

These changes revise PAP-1912, "Burn Permits for Ignition Sources," and PAP-1916, "Duties of the Fire Watch," with respect to the performance of fire watch activities during plant Burn Permit operations.

Summary

- I. No. The changes to PAP-1912 and PAP-1916 are administrative only. The changes are consistent with NRC and NFPA Guidelines. There is no impact upon any plant system design or operation. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The changes made are only to the administration of portions of the overall Fire Protection Program. The changes do not impact the design or operation of any plant system. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The changes made are consistent with the Fire Protection Program as described in Technical Specifications. Therefore, no margin of safety as defined in the bases for Technical Specifications will be reduced.

SE No.: 91-112

Source Document:

DCP 90-189, Rev. 0

SCR 1-91-1243 through 1-91-1248

Description of Change

This evaluation analyzes the addition of a one second time delay relay to the main steam line isolation logic.

Summary

- I. No. This change adds a one second time delay relay to the main steam line isolation logic. This modification will eliminate spurious trip signals created when the circuit thermocouple monitors are tested. The modification is consistent with the recommendations of IEN 86-69. Associated trip logic for the circuits in question have not been affected. There is no impact upon containment isolation valve closure times. Shutdown capability is not affected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. This modification does not affect the design or function of the Leak Detection System. Accident analysis has not been altered. Therefore, the possibility of creating an accident or malfunction of a type different than evaluated does not exist.
- III. No. The design or function of the Leak Detection System has not been adversely impacted. The modification is consistent with Technical Specification 3/4.3.2. Therefore, no margin of safety will be reduced.



SE No.: 91-113

Source Document: DCN 3568, Rev. 0  
USAR CR 91-090

Description of Change

This drawing change revises P&IDs 205-008 and 206-009; Loading and Unloading of Safety System Switchgear Divisions I, II, and III; to indicate that equipment start times are nominal values.

Summary

- I. No. This change is editorial in nature. The effects of sequence timer loading and response are detailed in calculation PSTG-20. This change does not impact this calculation. The equipment listed on these drawings will still be able to perform their design function. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change is editorial in nature. Normal equipment operation will be maintained. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. All operating requirements such as start time, loading, and sequencing associated with equipment described in the Technical Specifications will continue to be met. Therefore, no margin of safety will be reduced.

SE No.: 91-114

Source Document: DCN 3601, Rev. 0  
USAR CR 91-089

Description of Change

This drawing change updates USAR Figure 7.3-6, MSIV Leakage Control System, which changes the way the 1G33-F028 valve permissive is depicted.

Summary

- I. No. This drawing change revises the way in which the 1G33-F028 valve permissive is depicted. It does not alter the function of the valve. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change is essentially editorial. The function of 1G33-F028 has not been altered. There is no impact on any plant system. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This change is editorial. It does not make any changes to the plan. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-115

Source Document: DCN 3161, Rev. 0  
USAR CR 91-088

Description of Change

This drawing change updates the P&ID 808-309 series, Residual Heat Removal System, by clarifying existing design information located on the drawings.

Summary

- I. No. This change is editorial in nature. It does not alter the E12 System design configuration. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change only provides clarifying information on drawings which will not alter or affect any plant equipment. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This is an editorial change. It does not alter any plant equipment. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-116

Source Document: TXI-123, Rev. 0

Description of Change

This evaluation analyzes the use of non-precoated septa in the Condensate Filtration (N23) System Filter Vessel "B".

Summary

- I. No. The design function of the N23 System is to remove suspended solids from the condensate stream. This function can now be accomplished without the use of any precoat material. Water quality has not been affected by this change. Accident analysis has not been impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. The function of the N23 System has not been altered. Water quality is unaffected. If the new septa would fail, its parts would be collected by the Condensate Demineralizers. N23 System failure will not impact any safety-related equipment. Hence, the possibility of creating an accident or malfunction of a type different than evaluated does not exist.
- III. No. The N23 System is nonsafety-related. Water quality is unaffected. Therefore, no margin of safety as described in the bases for Technical Specifications will be reduced.

SE No.: 91-117

Source Document: USAR CR 91-075

Description of Change

This evaluation analyzes an administrative change to USAR Section 17.2.2.2.e. The change will bring USAR terminology with regards to "changes to the QA program" into agreement with the terminology of 10CFR50.54(a).

Summary

- I. No. This change is administrative only. No plant systems or components have been altered. Accident analysis has not been impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change is administrative only. The plant has not been altered nor has accident analysis been impacted. The change is consistent with 10CFR50.54(a). Further the change does not reduce the effectiveness of the QA Plan. Therefore, no margin of safety has been reduced.

SE No.: 91-121

Source Document: DCP 87-715, Rev. 0

### Description of Change

This design change makes several modifications to the Main Steam Isolation Valves (MSIV) 1B21-F022A/B/C/D and 1B28-F028A/B/C/D. The modifications include poppet replacement, stem replacement, and installation of live load packing.

### Summary

- I. No. The MSIV's will continue to meet ASME Section III subsection NB standards. Valve operation and function are not impacted. Improved Local Leak Rate Test (LLRT) performance has been demonstrated. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluation is not increased.
- II. No. The MSIV's will still operate and function as designed. The modification reduces the potential for stem leakage. LLRT performance has been improved. Therefore, the possibility of creating an accident or malfunction of a type different than evaluated does not exist.
- III. No. The MSIV's continue to satisfy ASME standards. Valve function and operation have not been changed. Technical Specifications have not been impacted. Therefore, no margin of safety will be reduced.

SE No.: 91-122

Source Document: DCP 87-137, Rev. 0

### Description of Change

This design change replaces the Fuel Servicing (F11) and Refueling (F15) Equipment Auxiliary, Monorail and Main Fuel Hoists' hydraulic load cells with solid-state load cells.

### Summary

- I. No. This change does not effect the operation of the hoists. The solid-state cell is designed such that all outputs are identical to the outputs of the hydraulic cell. Hence, there is no impact upon any control interlocks, load limits or rod blocks. Therefore, the probability of occurrence or the consequences of an accident or the malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The solid-state load cell is designed such that if power is lost the hoist is placed in a safe inoperable status. Hoist operation or control is not impacted. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. The load cells are nonsafety-related. There is no change to any F11 or F15 System function. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 91-125

Source Document: DCP 90-162, Rev. 1

Description of Change

This design change adds requirements for making a grout repair of a void made beneath the Circulating Water Pumphouse truck bay slab. The original scope of work described in DCP 90-162, Rev. 0 is unaltered by this revision. (Reference Safety Evaluations 90-121 and 90-122)

Summary

- I. No. This repair does not impact any plant system or component. The alterations to the Fire Water (P54) System and the Potable Water (P71) System created by this design change are not impacted by this repair. Therefore, the probability of occurrence or the consequences of an accident or a malfunction previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This repair does not impact any plant system or component. Therefore, the margin of safety as described in the bases for Technical Specifications will not be reduced.



SE No.: 91-128

Source Document: NR 91-S-077, Rev. 0

Description of Change

This evaluation analyzes the use-as-is disposition of the Suppression Pool Makeup (G43) System Valve 1G43-F030A. The valve opening exceeds its specified opening time of 30 seconds.

Summary

- I. No. The G43 System will still function as designed. Design calculation (Calc. G43-B) has conservatively assumed that there is no flow during the opening of the valve. This assumption mitigates the condition of the valve exceeding its opening time by 2 seconds. There is no impact upon the design bases of suppression pool level or drywell vent coverage. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. This disposition does not impact the design, function, or operability of the G43 System. Drywell vent coverage and suppression pool level design bases have not been altered. Accident analysis has not been impacted. Therefore, the possibility of creating an accident or malfunction of a type different than evaluated does not exist.
- III. No. There is no impact upon the operability of the G43 System or the Suppression Pool. Therefore, no margin of safety is reduced.

SE No.: 91-130

Source Document: PSTG, Rev. 1, TC-2

Description of Change

This evaluation analyzes defeating the Reactor Protection System (RPS) trips during the performance of the Reactor Control Guidelines of the Perry Specific Technical Guidelines (PSTG), Rev. 1.

Summary

- I. No. Defeating the RPS trips will not be performed until after RPS has been automatically initiated and has failed. This is an ATWS event. Since the plant is in an ATWS event prior to this activity occurring and that ATWS assumes RPS failure, the plant remains in an analyzed condition. This condition is described in USAR Section 15.8. No other accident analysis is impacted. Further, performance of activity will be administratively controlled by the PSTG. Additionally, there will be no impact upon any other plant system or component. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated is not increased.
- II. No. See Item I above.
- III. No. Defeating the RPS trips allows draining the scram discharge volume which will permit the insertion of a manual scram signal. This action is more conservative than that required by Technical Specifications for failure of the RPS. Therefore, no margin of safety will be reduced.

SE No.: 91-131

Source Document: DCN 3587, Rev. 0

Description of Change

This drawing change revises P&ID 302-752, Offgas (N64) System, to indicate valves 1N64-F082A/B are normally closed and to make several editorial corrections.

Summary

- I. No. These changes do not alter the design or operation of the N64 System. There is no impact upon accident analysis as described in USAR Chapter 15. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment is not increased.
- II. No. These changes do not impact the design or operation of the N64 System nor do they impact accident analysis. Further, these changes do not physically alter the plant. Hence, the possibility of creating an accident or malfunction of a type different than evaluated does not exist.
- III. No. These changes do not impact the Offgas System or accident analysis. Technical Specification 3/4.11.2 has not been affected. Therefore, no margin of safety is reduced.

SE No.: 91-134

Source Document: USAR CR 90-085

### Description of Change

This evaluation analyzes clarifying USAR Section 4.6.1.1.2.5.3 to state that the scram times listed are the maximum scram times.

### Summary

- I. This change is editorial in nature. The change is consistent with the description contained in GE reference document, 383HA670AF Rev. 5. This change does not alter the design, function or operation of a CRD HCU, and it does not alter the CRD scram times which are controlled by Technical Specifications. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated in the USAR is not increased.
- II. This change is editorial in nature. As stated in Item I above, the design, function or operation of the HCU's or control rods has not been altered. Hence, there is no possibility for creating an accident or malfunction of a different type than previously evaluating in the USAR.
- III. This change is editorial in nature. It is consistent with Technical Specifications 3.1.3.2 and 3.1.3.3. Therefore, no margin of safety has been reduced.

SE No.: 91-137, 91-150  
Source Document: DCN 3571, Rev. 0

Description of Change

This drawing change revises P&IDs 806-022 and 806-023, Plant Radiation Monitoring; 912-621, Heater Bay Ventilation System; 912-622, Offgas Building Exhaust; and 912-613, Intermediate Building Ventilation System. The revisions include the addition/deletion of various component - computer interfaces and clarifying pressure indicator configurations.

Summary

- I. No. This drawing change does not affect any plant system. The function or operation of the systems listed above have not been altered. Off-site dose limits have not changed. Accident analysis has not been affected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment is not increased.
- II. No. This change does not impact the plant or any system listed above. Accident analysis and radiation analyses contained in the USAR have not been affected. Hence, the possibility of creating an accident or malfunction of a type different than evaluated does not exist.
- III. No. The plant has not been affected. The design, function, or operation of the systems listed above have not been altered. Technical Specifications has not been impacted. Therefore, no margins of safety are reduced.

SE No.: 91-147

Source Document: DCN 3640, Rev. 0

Description of Change

This drawing change revises Plant Radiation Monitoring P&IDs 806-009, 806-010, 806-018, 806-019, and 806-024 to clarify design information contained on the drawings.

Summary

- I. No. These drawing changes do not affect the design or function of any Plant Radiation Monitoring System component. The Off-site dose limits are not altered. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment is not increased.
- II. No. These changes are editorial. There is no impact upon the plant or any plant radiation analysis. Therefore, the possibility of creating an accident or malfunction of a type different than evaluated does not exist.
- III. No. These changes are editorial. The design or operation of the Radiation Monitoring System have not been impacted. Therefore, no margins of safety are reduced.

SE No.: 91-149

Source Document: USAR CR 91-074

Description of Change

This evaluation analyzes clarifying the Pressure Regulator Failure - Open transient analysis contained in USAR Section 15.1.3.

Summary

- I. No. The plant has not been changed. It will be operated as designed. The initial conditions and the initiators of this event have not been altered. The safety results of this event also have not been altered. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety is not increased.
- II. No. The plant has not been modified nor has the results of the transient analysis been modified. Analysis of the transient indicates a potential for exceeding the vessel cooldown rate. However, administrative controls are in place which ensures that the cooldown rate will not impact the structural integrity of the vessel. Therefore, the possibility of creating an accident or a malfunction of a type different than evaluated does not exist.
- III. No. The plant has not been altered and will be operated as designed. Transient consequences have not been changed. The vessel possesses a large design margin relative to operation under abnormal and accident conditions. This change does not adversely impact these analyses. Therefore, no margin of safety has been reduced.

SE No.: 91-151

Source Document: USAR CR 91-079

Description of Change

This evaluation analyzes a modification to the USAR text which renames the Radiological Controlled Area (RCA) the Radiologically Restricted Area (RRA).

Summary

- I. No. This change is editorial in nature. There is no change to the plant nor to accident analysis. Further, there are no changes in the radiological analyses contained in the USAR. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change is editorial. There is no impact upon the plant, accident analysis, or radiological analyses. Technical Specifications are not affected. Therefore, no margins of safety are reduced.



SE No.: 91-155

Source Document: DCN 3637, Rev. 0

Description of Change

This drawing change revises P&ID 302-221, Turbine Building Closed Cooling (P44) System, to delete the normal valve position of 1P44-F575. The position for this valve is redundant since a downstream valve, 1P44-F616, is normally closed and provides the system boundary isolation.

Summary

- I. No. This valve does not impact P44 System operation. The P44 System is nonsafety-related. Plant operation is unaffected. Accident analysis has not been altered. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. Plant operation has not been impacted. Accident analysis is unaffected. The piping in question is 3/4-inch. Valve 1P44-F616 provides adequate system isolation. The P44 System provides no safety function. Therefore, the possibility of creating an accident or malfunction of a type different than previously evaluated does not exist.
- III. No. P44 System or overall plant operation have not been impacted. Technical Specifications are not affected. Therefore, no margins of safety are reduced.

SE No.: 91-157

Source Document: HRI-0001, Rev. 0

Description of Change

This evaluation analyzes the creation of an administrative instruction which addresses the performance of the licensed operator medical examination. Further, the instruction incorporates the use of ANSI/ANS 3.4-1983 as the standard for the medical examination.

Summary

- I. No. This evaluation is administrative in nature. The medical examinations will be conducted in accordance with ANSI/ANS 3.4-1983. This standard is essentially identical to the standard (ANSI N546-1976) previously used to conduct the examinations. Accident analysis will not be impacted by the creation of an administrative instruction or the use of an equivalent standard. The instruction does not direct any plant operation. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment is not increased.
- II. No. This activity only creates an administrative instruction. The instruction does not alter the design or operation of any plant system or component. As stated above, accident analysis is not impacted. Hence, the possibility of creating an accident or malfunction of a type different than evaluated does not exist.
- III. No. This activity is administrative in nature. The plant has not been altered. The examination standards are essentially equivalent. Hence, there is no reduction in commitment. Therefore, no margin of safety will be reduced.

SE No.: 91-160

Source Document: USAR CR 91-087

Description of Change

This evaluation analyzes the use of different resin ratios in the radwaste demineralizers. This will permit the selection of resin ratio based upon influent water chemistry.

Summary

- I. No. There is no change to any plant equipment or to the radwaste demineralizers. Waste water will still be chemically and isotopically analyzed prior to its re-use or discharge. Waste will still be radiologically monitored during any release. Accident analysis is not impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. See Item I above.
- III. No. The monitoring of radwaste liquid effluents as required by Technical Specifications will not be affected. There are no changes to any plant or radwaste equipment. Therefore, no margins of safety are reduced.

SE No.: 91-162

Source Document: DCN 3629, Rev. 0

### Description of Change

This drawing change revises P&IDs 302-107, 302-108, and 302-109, Condensate Demineralizing System, by incorporating in-line strainers to the in-bed conductivity sample lines.

### Summary

- I. No. The in-line strainers were added to remove impurities to ensure proper closure of sample line isolation valves. These strainers enhance the design function of these valves. Failure of the sample lines does not adversely impact any system important to safety. Accident analysis is not impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment is not increased.
- II. No. Failure of the strainers would prohibit sampling. However, the lines are nonsafety and the inability to sample does not impact any plant safety-related system or component. Accident analysis is not impacted. Therefore, the possibility of creating an accident or malfunction of a type different than evaluated does not exist.
- III. No. The strainers or their failure will not impact any safety-related system or component. Water chemistry will not be impacted. Chemistry values will remain consistent with Technical Specification 3/4.4.4. Therefore, no margin of safety will be reduced.

SE No.: 91-164

Source Document: DCN 3533, Rev. 0

Description of Change

This drawing change revises F&IDs 302-052, Auxiliary Steam System; 805-029, Hotwater Heat Exchanger "B" Level Setting Diagram; and 814-143, Hotwater Heat Exchanger "B" Level Instrumentation Installation Diagram; to depict the physical relocation of level switches P61-N111 and P61-N115.

Summary

- I. No. The switch relocation was performed to eliminate a low level alarm from occurring during normal hot water heat exchanger operation. MFI 1-90-092 was the activity which physically relocated the level switches. The function of the level switches has not been changed. The function and operation of the Building Heating System has not been altered. Accident analysis has not been impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. The function of the Building Heating System has not been altered. This system is not required for safe shutdown. The operation of the plant has not been impacted. Hence, the possibility of creating an accident or malfunction of a type different than previously evaluated does not exist.
- III. No. Technical Specifications 3/4.3 and 3/4.7 are not impacted by this change. There is no impact upon the plant or the plant's safety own capability. Therefore, no margins of safety are reduced.

SE No.: 91-169

Source Document: DCN 3648, Rev. 0

#### Description of Change

This drawing change revises P&ID 013-005, Final Plant Layout, Plan C above 620'-6" - 624'-6", to indicate the removal of a concrete "knockout" within the wall between room 623-03 and room 623-08 in the Radwaste Building. The change also indicates the installation of equipment added by DCPs 86-008 and 86-008B.

#### Summary

- I. No. This change does not affect the structural integrity of the wall in question since original wall design assumed the "knockout" was removed (Reference File #8:05.4). The added equipment is nonsafety, nonseismic. All loads remain within the original design capacity of the concrete slab (Reference File #8:08.10). The radiological zones of the building have not been affected. The change does not impact any safety-related equipment. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. See Item I above.
- III. No. There is no impact upon the structural integrity of the Radwaste Building. Technical Specifications are not affected. Hence, no margin of safety is reduced.

SE No.: 91-171

Source Document: SP 2000, Rev. 3

Description of Change

This evaluation analyzes a change made to the Piping and Mechanical Equipment Installation Specification (SP 2000). The change adds Pipeline Spec. D25-1 which permits replacement of Reactor Water Cleanup (G33-RWCU) System SA106 Grade B carbon steel piping with electropolished, preoxidized SA-376 TP347 stainless steel piping.

Summary

- I. No. The new piping material meets all ASME Section III and XI requirements. Further, the new material is more resistant to internal radioactive material build-up. Any installation utilizing the new piping will be analyzed/evaluated for its intended application, thus ensuring all design specifications and codes associated with that application are satisfied. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. The new material satisfies all ASME Section III and XI requirements for materials, manufacturing, installation, quality, and testing. Use of the new material will be analyzed/evaluated for its intended application ensuring that the material satisfies the design criteria of the application. Therefore, the possibility of creating an accident or malfunction of a type different than evaluated does not exist.
- III. No. The new material meets all of ASME Section III and XI requirements for materials, manufacturing, installation, quality, and testing. Any replacement or new installation utilizing this material will be analyzed/evaluated for its intended application and will meet design requirements as required by the application. This ensures that any system which utilizes this piping material will function as designed and remain operable under all design conditions. Therefore, no margin of safety as defined in the basis of Technical Specifications is reduced.

SE No.: 91-172

Source Document: DCN 3682, Rev. 0

#### Description of Change

This design change revises P&ID 302-753, Offgas System, to add an interlock function from level switch 1N64-N715 to inhibit starting the glycol agitator when sensing low tank level.

#### Summary

- I. No. This change reflects the as-built condition of the glycol tank electrical logic. This change does not modify the plant. Accident analysis has not been affected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment is not increased.
- II. No. There is no impact upon the plant or accident analysis. This change does not affect any radiation release analyses. Therefore, the possibility of creating an accident or malfunction of a type different than previously evaluated does not exist.
- III. No. The Offgas glycol system is nonsafe. There is no impact on any plant system. Glycol tank instrumentation is not described in the Technical Specifications. Therefore, no margins of safety are reduced.



SE No.: 91-173

Source Document: DCN 3363, Rev. 0  
DCN 3604, Rev. 0

### Description of Change

This evaluation analyzes updating various Emergency Service Water (P45-ESW) System related USAR sections and plant drawings. The USAR changes include revising ESW heat loads, updating operating parameters, and clarifying the use of lay-up for the Residual Heat Removal System Heat Exchangers. The drawing changes include revising operating parameters on P&ID 302-793, Emergency Service Water Operating Data, and incorporating the LOOP signal and note clarification on P&ID 302-621, Emergency Closed Cooling System Unit 1, and 352-621, Emergency Closed Cooling System Unit 2.

### Summary

- I. No. These changes are based upon previously evaluated and approved design information (Reference: Calc's G41-34 Rev. 2, P45-30 Rev. 4, P42-11 Rev. 2, P45-34 Rev. 0, G/C 2.6.13.1 Rev. 1; DCP 90-086; and Safety Eval's 88-387, 90-155, 90-213). The changes do not alter the safety function of the ESW System. Further, this change does not impact the current operation of the plant nor affect any plant equipment. Therefore, the probability of occurrence or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. This change does not modify the current operation of the plant nor affect equipment. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This change is essentially editorial. ESW System availability is not altered. Radiation monitoring of the ESW System has not changed. Therefore, no margin of safety as defined in the bases for Technical Specification will be reduced.

SE No.: 91-176

Source Document: USAR CR 91-125

Description of Change

This evaluation analyzes a modification of the USAR text which renames the Plant ALARA Review committee the ALARA subcommittee.

Summary

- I. No. This change is editorial in nature. There is no change to the plant nor to accident analysis. Further, there are no changes in the radiological analyses contained within the USAR. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change is editorial. There is no impact upon the plant, accident analysis or radiological analyses. Technical Specifications are not affected. Therefore, no margin of safety are reduced.

SE No.: 91-177

Source Document: USAR CR 91-105

Description of Change

This evaluation analyzes incorporating Reload 2, Cycle 3 into USAR Chapters 5 and 15. (Reference Safety Evaluation 90-222)

Summary

- I. No. The fuel mechanical design, its thermal-hydraulic design, and its nuclear design do not impact any accident or transient. The reload does not alter the design or function of any plant system or component. Safety Evaluation 90-222 concludes that the MCPR and LHGR limits are not violated. The reload analysis results in a maximum vessel pressure of 1258 psig. The ASME Code limit is 1375 psig. Therefore, the pressure boundary limit is not violated. Hence, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated in the USAR has not changed.
- II. No. No plant changes are being made with the exception of the addition of a new fuel type. The fuel type has been accepted for use by the NRC as detailed in their safety evaluation for GESTAR II Amendment 10. Fuel failure mechanisms as described have not changed. Therefore, creating an accident or malfunction of equipment different than that previously evaluated in the USAR is not possible.
- III. No. The reload does not alter the design or function of any plant system. The reload does not adversely impact the accident analysis contained in the USAR. The fuel design of the new fuel has been approved by the NRC. Safety Evaluation 90-222 and the responses above show that the reload satisfies all appropriate acceptance criteria. As such, the reload does not reduce any margins of safety.

SE No.: 91-178

Source Document: DCN 3684, Rev. 0

Description of Change

This drawing change incorporates clarifying design information on P&ID 302-701, High Pressure Core Spray (E22) System.

Summary

- I. No. This change is editorial. There is no affect upon the design or function of the E22 System. No radiological consequences associated with any accident are impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. See Item I above.
- III. No. This change is editorial. The design or operability of the E22 System have not been impacted. Hence, no margin of safety is reduced.

SE No.: 91-179

Source Document: DCN 3701, Rev. 0

### Description of Change

This drawing change revises P&IDs 914-003, Fire Service Water, and 023-019, Fire Protection Evaluation Auxiliary and Reactor Buildings Plan-620'6", by correcting the fire hose lengths on several hose reels.

### Summary

- I. No. This drawing change is editorial in nature. It reflects the as-built configuration of the Fire Service Water System. The change does not alter the design of the Fire Service Water System. The system remains in compliance with NFPA 14 and the Fire Protection Program of PNP. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. See Item I above.
- III. No. This change is editorial. It does not impact the Fire Service Water System. Further, there is no impact upon the alternate shutdown capabilities of the plant as analyzed in the Safe Shutdown Capabilities Report. Hence, no margin of safety is reduced.

SE No.: 91-180

Source Document: USAR CR 91-107

Description of Change

This evaluation analyzes a revision to USAR Section 9.1.4.2 which clarifies the plant's fueling activities. Additionally, a clarification was made to the description of the cask pit.

Summary

- I. No. This change is editorial in nature. It does not alter the design, function or operation of any plant system. The changes are consistent with the design basis documents for fueling equipment. Accident analysis is not impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment is not increased.
- II. No. See Item I above.
- III. No. This change is editorial. No plant equipment or operations have been affected. The change is consistent with plant design bases. Accident analysis has not been impacted. Hence, no margins of safety are reduced.

SE No.: 91-183

Source Document: USAR CR 91-122

Description of Change

This evaluation analyzes replacing the existing Reactor Protection System Instrumentation and Electrical Diagram, USAR Figure 7.2-1, with an as-built figure. This is part of the GE drawing reconciliation program to replace existing GE drawings with Perry drawings.

Summary

- I. No. This change is essentially editorial. The design of the Reactor Protection System (RPS) has not been altered. Off-site dose analyses have not been impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. This change is editorial. The design or operability of RPS is not affected. No margin of safety is reduced.

SE No.: 91-186

Source Document: DCN 3694, Rev. 0

Description of Change

This drawing change makes editorial revisions to the Offgas System P&IDs 302-751, 302-752, 302-753, and 302-754 by incorporating the GE drawing number as a reference.

Summary

- I. No. This change is editorial. There is no impact upon the design or operation of the Offgas System. Accident analysis is not affected. Therefore, the probability of occurrence or the consequences of an accident or a malfunction of equipment is not increased.
- II. No. See Item I above.
- III. No. This change is editorial. There is no impact upon the Offgas System. Technical Specification 3/4.11.2 is not affected. Hence, no margin of safety is reduced.



SE No.: 92-008

Source Document: USAR CR 92-004

Description of Change

This evaluation analyzes revising USAR Section 2.5 to incorporate the results of the generic seismic hazard study (EPRI NP-6395-ND, April 1989) performed by EPRI.

Summary

- I. No. This change is editorial. Analysis of the EPRI study states that the plant seismic design is satisfactory. The probability of occurrence of a large earthquake (similar to an OBE or SSE) has not changed. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. The seismic design basis of the plant has not been altered. The probability of an OBE/SSE-like earthquake has not changed. Hence, the possibility of creating an accident or malfunction of a type different than evaluated does not exist.
- III. No. The margin of safety is not impacted as no design criteria are modified, the seismic design bases are not changed, and the probability of large earthquakes has not changed.

SE No.: 92-009

Source Document: USAR CR 92-005

Description of Change

This evaluation analyzes various administrative revisions (correcting typos, spelling, grammar, etc.) to the USAR.

Summary

- I. No. This change is administrative. There is no impact upon any plant system or component. No analysis contained in the USAR have been affected. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. See Item I above.
- III. No. This change is administrative. It only affects editorial corrections or clarifications to the USAR text. The plant or any of the analyses contained in the USAR have not been impacted. None of the USAR modifications affects Technical Specifications. Therefore, no margin of safety is reduced.

SE No.: 92-010, 92-013  
Source Document: USAR CR 92-006  
USAR CR 92-008

Description of Change

This evaluation analyzes revising USAR Section 2.5 to incorporate updated information on local and regional seismicity.

Summary

- I. No. The changes incorporated do not identify any new geologic structures with the potential for producing earthquakes at the site, at a magnitude or frequency greater than the largest historically observed earthquakes. Additionally, no geologic structures that include capable faults, or which could produce volcanoes or tidal waves, have been identified. Based on the above, use of the tectonic province approach to determine the maximum earthquake potential affecting the PNPP site, as defined by 10CFR100, Appendix A, remains valid. As a result, there is no change to the basis for establishing the Safe Shutdown Earthquake and, therefore, there is no change to the seismic design criteria. Hence, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. No new geologic structures with the potential for producing earthquakes at the site, at a magnitude or frequency greater than the largest historically observed earthquakes, have been identified. Additionally, no geologic structures that include capable faults, or which could produce volcanoes or tidal waves, have been identified. Hence, there is no change to the seismic design criteria. Therefore, the possibility of creating an accident or malfunction of a type different than evaluated does not exist.
- III. No. The margin of safety for the Safe Shutdown Earthquake has not been reduced as there are no changes to the expected largest earthquake in the region, as concluded in the analysis above.

SE No.: 92-012

Source Document: USAR CR 92-007

Description of Change

This evaluation analyzes making various editorial revisions to the USAR. The revisions include administrative corrections to figure titleblocks and updating figure lists.

Summary

- I. No. The changes are editorial in nature. There are no changes to the plant or any plant drawing. Accident analysis has not been impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated in the USAR is not increased.
- II. No. These changes are editorial only. The plant has not been changed nor has accident analysis been impacted. Hence, the possibility of creating an accident or malfunction of a type different than evaluated does not exist.
- III. No. These changes are editorial. The plant has not been altered. Accident analysis has not been impacted. Therefore, no margin of safety will be reduced.

SE No.: 92-016

Source Document: DCN 3710, Rev. 0

Description of Change

This drawing change revises P&ID 912-618, Turbine Power Complex Ventilation (M42) System, to reflect the proper system airflows as established by DCP 89-189.

Summary

- I. No. This change is editorial in nature. It reflects the as-built configuration of the M42 System as established by DCP 89-189. Overall, this change does not alter the design or operation of the M42 System. This change does not impact accident analysis. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. See Item I above.
- III. No. This change does not affect the design or function of the M42 System. There is no impact upon the plant. Therefore, the margin of safety as defined in the basis for Technical Specifications is not reduced.

SE No.: 92-018

Source Document: DCN 3719, Rev. 0

Description of Change

This drawing change makes an editorial revision to P&ID 912-613, Intermediate Building Ventilation (M33) System, by updating several MPL numbers and incorporating a note evaluated and approved in DCP 85-295B.

Summary

- I. No. This drawing change is editorial in nature. There is no impact upon the M33 System or any other plant equipment. This change does not affect any plant radiological analysis. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. This change does not alter the design or function of the M33 System. There is no impact upon the Off-site dose limits. Accident analysis has not been changed. Hence, the possibility of creating an accident or malfunction of a type different than evaluated does not exist.
- III. No. This change is editorial. There is no impact upon the M33 System. M33 is nonsafety-related. Hence, no margin of safety as defined in the basis for Technical Specifications is reduced.

SE No.: 92-022

Source Document: DCN 3572, Rev. 0

Description of Change

This drawing change revises P&ID 206-017; One Line Meter and Relay Diagram, Class 1E, 4.16 KV, Divisions 1 and 2; by listing the design specifications for transformer LH-1-A.

Summary

- I. No. This change is editorial. The design specifications have not been changed. Operation of the equipment remains unchanged. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment is not increased.
- II. No. See Item I above.
- III. No. This change is editorial. The equipment ratings have not been changed. There is no impact upon the availability of the two independent offsite sources required by Technical Specifications. Hence, no margin of safety is reduced.

SE No.: 92-027

Source Document: USAR CR 92-015

### Description of Change

This evaluation analyzes revising USAR Figure 8.3-18, Principal Cable Routes ESW Pumphouse above 586'-6", by incorporating the as-built configuration of four nonsafety, seismic cable trays.

### Summary

- I. No. These trays or their failure to perform their design function do not affect any safety-related system or component located within the ESW Pumphouse. The seismic capability of the trays has not been altered. Therefore, tray failure will not impact accident analysis. Hence, the probability of occurrence or the consequences of an accident or malfunction of equipment is not increased.
- II. No. This change does not impact the design, function or seismic qualification of the cable trays. Accident analysis has not been altered. Therefore, the possibility of creating an accident or malfunction of a type different than evaluated does not exist.
- III. No. This change does not impact the design, function or seismic qualification of the cable trays. There is no effect upon any safety-related system or component located in the ESW Pumphouse. Therefore, no margin of safety is reduced.



SE No.: 92-028

Source Document: USAR CR 92-016

Description of Change

This evaluation analyzes revising USAR Figure 7.2-1, Reactor Protection System Instrumentation and Electrical Diagram, by incorporating various editorial changes in accordance with the GE reconciliation program. No design or hardware changes were made by this figure change.

Summary

- I. No. This change is editorial. The only changes were revising matchmarks to follow PNPP philosophy and properly referencing Table 2 on the drawing. No changes were made to the design or configuration of the Reactor Protection (C71) System. Offsite dose analyses have not been impacted. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.
- II. No. See Item I above.
- III. No. This change is editorial. No C71 design or configuration changes were made. Technical Specifications have not been impacted. Hence, no margins of safety were reduced.

Attachment 4  
PY-CEI/NRR-1458L

PERRY NUCLEAR POWER PLANT

SAFETY EVALUATION SUMMARY

PURSUANT TO

10 CFR 50.59(b)(2)

SUPPLEMENTAL REPORT

SE No.: 88-467

Source Document: DCP 88-072, Rev. 0

### Description of Change

This design change makes several modifications to the Division 3 High Pressure Core Spray (HPCS) Diesel Generator (DG) start circuit. This Safety Evaluation is the first Revision to Safety Evaluation 88-467.

### Summary

- I. No. The change makes two major modifications to the HPCS DG start circuit. First, a parallel set of manual engine control switch contacts were added. This ensures that the Control Room switch must be in the "start" or "auto" position in order for the engine to receive/maintain any start signal. Second, the generator output breaker auxiliary contacts were replaced with the output breaker's cell switch contacts. This eliminates the breaker "open" lockout in the start circuit. These changes do not affect the function of the HPCS DG with respect to its response to a plant emergency.

The change also adds a relay in the start circuit which provides isolation of the lube oil recirculation pump, the jacket water keepwarm heater and the generator space heater. The prelubrication and prewarming functions of the isolated components is not required during the short period of time between receipt of any start signal and operation of the DG at rated speed. Prelubrication is provided by the static pressure head from the lube oil cooler which is kept full during standby conditions by the circulating pump. Due to the mass of the DG, no appreciable temperature decrease will occur during this time period. Hence, isolation of these components during any engine operation will not impact the function of the HPCS DG. Therefore, the probability of the occurrence or the consequences of an accident or malfunction of equipment previously evaluated is not increased.

- II. No. All of the components installed as the result of this change meet all of the original system equipment qualification requirements. Additionally the physical installation of these components and their associated wiring is in accordance with the original installation requirements. This change does not affect the function of the Division 3 DG. Hence, the possibility for an accident or malfunction different than previously evaluate is not created.

SE No.: 88-467 (Continued)

III. No. The margin of safety as defined in the bases of Technical Specification Section 3/4-8 refers to the reliability of the on-site power supplies. As described in Items I and II above, the function of the Division 3 Diesel Generator has not been altered by this design change. Hence, the margin of safety described in the Technical Specification bases is not affected.

SE No.: 89-090

Source Document: DCP 88-364, Rev. 0

Description of Change

This design change installs 2 three-inch pitot tube taps in the fiberglass piping of Circulating Water (N71) System.

Summary:

- I. No. The N71 System is nonsafety-related. Failure of the pitot tube taps could create a flooding hazard. However, this condition is bounded by the flooding analysis contained in the USAR for failure of the N71 piping. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. The worst case failure of the Circulating Water System pipe, the condenser would loose vacuum. This would cause a turbine trip as well as a reactor scram. This transient sequence is analyzed in the USAR. Therefore, the possibility for creating an accident or malfunction previously in the USAR does not exist.
- III. No. The Circulating Water System is not addressed in Technical Specifications. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 89-171

Source Document: DCP 88-339, Rev. 6

### Description of Change

This design change returns the existing Offgas (N64) System loop seal (N64) Barton level instrumentation to service and spares the previous system modification in place.

### Summary

- I. No. The replacement of the instrumentation for monitoring level in the hold-up line, prefilter, and cooler condenser moisture separator loop seals will not be completed at this time. All control and alarm functions will be returned to the original differential pressure switches. There is no change to N64 System function. The level probes connected to the N64 System piping pressure boundary meet the requirements of the Standard Review Plan relative to design for hydrogen explosion limits. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. As stated above the system will operated as originally designed. Therefore, the possibility of creating an accident or malfunction of a different type than any evaluated previously in the USAR does not exist.
- III. No. This installation will not affect the Technical Specification 3/4.11.24, since system function has not been changed or reduced. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.

SE No.: 90-024

Source Document: USAR CR 90-011

#### Description of Change

This evaluation analyzes testing valves 1E61-F549, 1E61-F550, 1E61-F551, 1E61-F552 in the reverse direction of flow. Additionally, a note will be modified to state that gate valve through seat leakage is not considered bypass leakage.

#### Summary

- I. No. This change meets the requirements of 10CFR50 Appendix J and ASME Boiler and Pressure Vessel Code for differential pressure tests in this manner if the valve's the functional differential pressure is 15 psi or less. This is the case for these valves. A test pressure of 15 psi or less does not provide a sufficient force to alter the seating characteristics of the valves. Further, this test pressure applied to either the inlet or the outlet of the valves will provide equivalent results. The note is just an editorial clarification. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the USAR is not increased.
- II. No. See Item I above.
- III. No. Operability of the tested valves is not affected. Leakage criteria as stated in Technical Specifications is not changed. Therefore, the margin of safety as defined in the bases for Technical Specifications will not be reduced.