DESCRIPTION OF AMENDMENT REQUEST

As a result of an NRC concern involving Low Temperature Overpressure Protection (LTOP), AP&L is proposing Technical Specifications which require additional restrictions and testing of the LTOP system. Many of the actions required by the proposed Technical Specifications are presently performed per AP&L procedures.

BASIS FOR PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed Technical Specifications are more stringent as they are an addition to the present Technical Specifications and require more testing than was previously required by the Technical Specifications.

The proposed amendment request does not involve a Significant Hazards Consideration as it does not involve a significant increase in the probability or consequences of an accident previously evaluated. Additionally, it does not introduce the possibility of a previously unanalyzed accident or involve a significant reduction in the margin of safety.

The Commission has provided guidance concerning the application of these standards by providing certain examples (40FR14870). The proposed amendment matches example (ii) "A change that constitutes an additional limitation, restriction or control not presently included in the technical specifications: for example, a more stringent surveillance requirement."

3.1.2.7 Prior to reaching fifteen effective full power years of operation, Figures 3.1.2-1, 3.1.2-2 and 3.1.2-3 shall be updated for the next service period in accordance with 10CFR50, Appendix G, Section V.B. The service period shall be of sufficient duration to permit the scheduled evaluation of a portion of the surveillance data scheduled in accordance with Specification 4.2.7. The highest predicted adjusted reference temperature of all the beltline region materials shall be used to determine the adjusted reference temperature at the end of the service period. The basis for this prediction shall be submitted for NRC staff review in accordance with Specification 3.1.2.8. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

3.1.2.8 The updated proposed technical specifications referred to in 3.1.2.7 shall be submitted for NRC review at least 90 days prior to the end of the service period. Appropriate additional NRC review time shall be allowed for proposed technical specifications submitted in accordance with 10 CFR Part 50, Appendix G, Section V.C.

3.1.2.9 With the exception of ASME Section XI testing and when the core flood tank is depressurized, during a plant cooldown the core flood tank discharge valves shall be closed and the circuit breakers for the motor operators opened before depressurizing the reactor coolant system below 600 psig.

3.1.2.10 With the exception of ASME Section XI testing, fill and vent of the reactor coolant system, and to allow maintenance of the valves, when the reactor coolant temperature is less than 280°F the four High Pressure Injection motor operated valves shall be closed with their opening control circuits for the motor operators disabled.

3.1.2.11 The plant shall not be operated in a water solid condition when the RCS pressure boundary is intact except as allowed by Emergency Operating Procedures and during System Hydrotest.

The heatup and cooldown rate stated in this specification are intended as the maximum changes in temperature in one direction in a one hour period. The actual temperature linear ramp rate may exceed the stated limits for a time period provided that the maximum total temperature difference does not exceed the limit and that a temperature hold is observed to prevent the total temperature difference from exceeding the limit for the one hour period.

Specification 3.1.2.9 is to ensure that the core flood tanks are not the source for pressurizing the reactor coolant system when in cold shutdown.

Specification 3.1.2.10 is to ensure that high pressure injection is not the source of pressurizing the reactor coolant system when in cold shutdown.

Specification 3.1.2.11 is to ensure that the reactor coolant system is not operated in a manner which would allow overpressurization due to a temperature transient.

REFERENCES

(1) FSAR, Section 4.1.2.4

(2) ASME Boiler and Pressure Code, Section III, N-415

(3) FSAR, Section 4.3.10.5

(4) BAW-1440

(5) BAW-1698

(6) BAW-1547, Revision 1

(7) BAW-1511P

(8) BAW-1436

Table 4.1-1 (Cont'd)

	Channel Description	Check	Test	Calibrate	Remarks
47.	EFW Actuation Control Logic	NA	M	R	
48.	EFW Flow Indication	R	NA	R	
49.	RCS subcooling margin monitor	D	NA	R	
50.	Electromatic relief valve flow monitor	D	NA	R	
51.	Electromatic relief block valve position indicator	D	NA	R	
52.	Pressurizer safety valve flow monitor	D	NA	R	
53.	Pressurizer water level indicator	D	NA	R	
54.	Control Room Chlorine Detector	D	M	R	
55.	Low Temperature Overpressure Protection Alarm Logic	NA	R	R	

Note:
S-Each Shift
W-Weekly
M-Monthly
D-Daily
T/W-Twice per Week
Q-Quarterly
P-Prior to each startup if not done previous week
B/M-Every 2 months
R-Once every 18 months
PC-Prior to going Critical if not done within previous 31 days
NA-Not applicable

Table 4.1-2 (Continued)
Minimum Equipment Test Frequency

Item	Test	Frequency
11. Decay Heat Removal System Isolation Valve Automatic Closure and Isolation System	Functioning	Every 18 months
12. Flow Limiting Annulus on Main Feedwater Line at Reactor Building Penetration	Verify, at normal operating conditions, that a gap of at least 0.025 inches exists between the pipe and the annulus.	One year, two years, three years, and every five years thereafter measured from date of initial test.
13. SLBIC Pressure Sensors	Calibrate	Every 18 months
14. Main Steam Isolation Valves	a. Exercise through Approximately 10% Travel	a. Quarterly
	b. Cycle	b. Every 18 months
15. Main Feedwater Isolation Valves	a. Exercise through Approximately 5% Travel	a. Quarterly
	b. Cycle	b. Every 18 months
16. Reactor Internals Vent Valves	Demonstrate Operability by:	Each refueling shutdown
	a. Conducting a remote visual inspection of visually accessible surfaces of the valve body and disc sealing faces and evaluating any observed surface irregularities.	
	b. Verifying that the valve is not stuck in an open position, and	

Table 4.1-2 (Continued)

MINIMUM EQUIPMENT TEST FREQUENCY

		c. Verifying through manual actuation that the valve is fully open with a force of $\leq$ 400 lbs (applied vertically upward).	
17. PORV		Exercise	End of each refueling outage.