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Georgia Power

the southern electric system

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003443

July 17, 1992

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

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
ADDITION OF ELECTRICAL SYSTEM REQUIREMENTS
NRC TAC NOS. 182418 AND 182419

Gentlemen:

In accordance with the provisions of 10 CFR 50.90, as required by 10 CFR 50.55(c)(1), Georgia Power Company (GPC) hereby proposes a change to the Plant Hatch Units 1 and 2 Technical Specifications (TS), Appendix A to Operating Licenses DPR-57 and NPF-5.

On July 18, 1991, the NRC issued Generic Letter (GL) 91-11, "Resolution of Generic Issues 48, 'LCOs for Class 1E Vital Instrument Buses,' and 49, 'Interlocks and LCOs for Class 1E Tie Breakers' Pursuant to 10 CFR 50.54(f)." By letter dated January 31, 1992, GPC responded to GL 91-11 describing actions taken to ensure Plant Hatch is in compliance with the requirements of the letter. In order to ensure the Plant Hatch Unit 1 electrical system is maintained in compliance with the single-failure criterion on an interim basis, administrative controls were implemented to add operability and surveillance requirements for the Unit 1 instrument buses and essential cabinets. Our response stated the long term solution would be to permanently revise the Unit 1 TS to add these same requirements. The first portion of this submittal requests implementation of this revision. Additionally, some minor errors, primarily of a typographical nature, have been corrected.

Enclosure 1 provides a detailed description of the proposed changes and the circumstances necessitating the change request.

Enclosure 2 details the basis for our determination the proposed changes do not involve a significant hazards consideration.

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U.S. Nuclear Regulatory Commission

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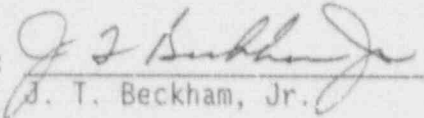
Enclosure 3 provides page change instructions for incorporating the proposed changes. Following Enclosure 3 are the proposed TS pages and the associated markups of the existing pages.

To allow time for procedure revisions and orderly incorporation into copies of the TS, GPC requests the proposed amendment, once approved by the NRC, be issued with an effective date to be no later than 60 days from the date of issuance of the amendment.

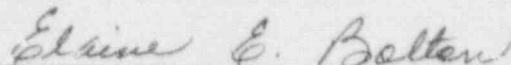
In accordance with the requirements of 10 CFR 50.91, a copy of this letter and all applicable enclosures will be sent to the designated state official of the Environmental Protection Division of the Georgia Department of Natural Resources.

Mr. J. T. Beckham, Jr. states he is duly authorized to execute this oath on behalf of Georgia Power Company, and to the best of his knowledge and belief, the facts set forth in this letter are true.

GEORGIA POWER COMPANY

By: 
J. T. Beckham, Jr.

Sworn to and subscribed before me this 17th day of July 1992.


Notary Public

MCM/cr

Enclosures

cc: (See next page.)

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Page Three

cc: Georgia Power Company
Mr. H. L. Sumner, General Manager - Nuclear Plant
NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.
Mr. K. Jabbour, Licensing Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II
Mr. S. D. Ebner, Regional Administrator
Mr. L. D. Wert, Senior Resident Inspector - Hatch

State of Georgia
Mr. J. D. Tanner, Commissioner - Department of Natural Resources

ENCLOSURE 1

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
ADDITION OF ELECTRICAL SYSTEM REQUIREMENTS

BASIS FOR CHANGE REQUEST

PROPOSED CHANGE 1:

The proposed change will add operability and surveillance requirements for essential cabinets 1A and 1B (MPL Nos. 1R25-S036 and 1R25-S037) and instrument buses 1A and 1B (MPL Nos. 1R25-S064 and 1R25-S065) to the Unit 1 Technical Specifications (TS). This change will also modify the TS Bases section to include these buses.

The new limiting conditions for operation (LCO) sections will require both essential cabinets and both instrument buses to be operable whenever the reactor is in the Standby & Hot Standby or Run Mode and the reactor water temperature is greater than 212°F, and will specify time limits for inoperability of this equipment. In addition, during these times, the crosstie breakers for the instrument buses will be required to be open.

The new surveillance requirements sections will require all of these buses to be monitored to assure they are capable of transmitting the emergency load. In addition, the instrument bus crosstie breakers will be periodically verified open.

The additions to the bases sections will describe the reasons for inclusion of the above LCO and surveillance requirements.

The addition of these requirements necessitated moving Specification 3.9.C and its associated footnote from page 3.9-6 to page 3.9-6a. Page 3.9-6a already has a footnote to Specifications 4.9.D.2 and 4.9.D.3, designated with a single asterisk. This designation is being changed to a double asterisk because the footnote to 3.9.C uses a single asterisk.

BASIS FOR PROPOSED CHANGE 1:

On July 18, 1991, the NRC issued Generic Letter (GL) 91-11, "Resolution of Generic Issues 48, 'LCOs for Class 1E Vital Instrument Buses,' and 49, 'Interlocks and LCOs for Class 1E Tie Breakers' Pursuant to 10 CFR 50.54(f)." Among other things, this letter stated the following:

"...all licensees should have appropriate procedures to fulfill the following requirements:

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
ADDITION OF ELECTRICAL SYSTEM REQUIREMENTS

BASIS FOR CHANGE REQUEST

1. Limit the time that a plant is in possible violation of the single-failure criterion with regard to the Class 1E vital instrument buses and tie breakers,
2. Require surveillances of these components..."

In the Plant Hatch response to GL 91-11, dated January 31, 1992, Georgia Power Company (GPC) committed to assure long-term compliance with the above requirements for Plant Hatch Unit 1 by adding appropriate operability and surveillance requirements to the Unit 1 TS. As stated in the response letter, it has been determined the Unit 2 TS already contain operability and surveillance requirements which comply with the above requirements. The GL 91-11 requirements were determined to be applicable to the following Plant Hatch equipment: instrument buses A and B (MPL Nos. 1 & 2R25-S064 and 1 & 2R25-S065), and essential cabinets A and B (MPL Nos. 1 & 2R25-S036 and 1 & 2R25-S037). Although GL 91-11 does not require changes to the TS, GPC is proposing these changes to ensure consistency between Unit 1 and Unit 2 TS requirements. Following is a description of the affected equipment and an explanation of how the proposed TS revisions fulfill the requirements of the GL.

Instrument Buses A and B

These buses power some instrumentation and controls having ESF applications. The normal power supply to each instrument bus is the associated essential cabinet. Essential cabinet A is part of division I of the Class 1E electrical system and supplies power to instrument bus A. Likewise, essential cabinet B is part of division II of the Class 1E electrical system and supplies power to instrument bus B. The only alternate power supply to an instrument bus is from the other instrument bus through crosstie breakers. If the crosstie breakers are closed and both instrument buses are also tied to their normal sources, then the single-failure criterion is not met for either bus and both buses must be considered inoperable. If the crosstie breakers are closed and only one bus is tied to its normal source, then the bus which is tied to its normal source is still operable but the other bus must be considered inoperable.

The "Limiting Conditions for Operation" section of the Unit 2 TS requires both instrument buses to be operable and specifies the crosstie breakers must be open. In reference to instrument buses A and B, the action statement of Unit 2 TS Specification 3.8.2.1 states:

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
ADDITION OF ELECTRICAL SYSTEM REQUIREMENTS

BASIS FOR CHANGE REQUEST

"With one of the above required A.C. distribution system buses inoperable, restore the inoperable bus to OPERABLE status within 8 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

With two or more of the above required A.C. distribution system buses or inverters inoperable, restore at least all except one of the inoperable buses and inverters to OPERABLE status within 2 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours."

The "Surveillance Requirements" Specification 4.8.2.1 of the Unit 2 TS requires a verification of correct instrument bus breaker alignment and indicated power availability at least once per 7 days. These controls were determined to be adequate to ensure the Unit 2 buses meet the single-failure criterion.

The Unit 1 TS do not currently address operability of the instrument buses. This proposed TS revision will add operability and surveillance requirements to the Unit 1 TS which are similar to the Unit 2 TS requirements. The proposed time limits for inoperable buses are the same as the time limits listed in the Unit 2 TS. However, the proposed Unit 1 specification is being worded to match the format of the remainder of the "Auxiliary Electrical Systems" section of the Unit 1 TS which is significantly different than the format of the Unit 2 TS. In addition, the proposed Unit 1 surveillance requirements are different from those in the Unit 2 TS. The Unit 2 TS require a weekly verification of indicated power availability. The corresponding requirement being proposed for the Unit 1 TS is consistent with the requirements for the other Class IE buses in the Unit 1 TS, and is worded as follows:

"The 120/208 volt Instrument Buses (IA and IB) shall be monitored to the extent that they are shown to be ready and capable of transmitting the emergency load."

The intent of the surveillance requirement is for the control board operator to monitor the buses continuously (i.e., as part of normal control board status monitoring), rather than at some specified frequency indicated in a surveillance procedure. Any condition resulting in a lack of power availability to an instrument bus will be immediately apparent to the operator due to alarms and loss of indication.

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
ADDITION OF ELECTRICAL SYSTEM REQUIREMENTS

BASIS FOR CHANGE REQUEST

The only instrument bus breaker misalignment which will not cause a lack of power availability is the crosstying of the instrument buses. Therefore, a surveillance requirement is being included in the proposed Unit 1 TS which requires a weekly verification to assure the crosstie breakers are open. These controls will ensure the Unit 1 instrument buses remain operable and in compliance with the single-failure criterion.

The "Bases for Limiting Conditions for Operation" section of the Unit 1 TS is being revised to add brief explanations of the operability and surveillance requirements which are being added for the instrument buses. These explanations will be very similar in format to the existing bases sections for the other Unit 1 Class 1E electrical equipment.

In addition, the bases section will contain a brief discussion of the bus operability implications of crosstie breaker closure. This will provide the TS user with information needed to make instrument bus operability determinations in situations where the crosstie breakers are closed or found to be closed.

Essential Cabinets A and B

In addition to supplying power to the instrument buses, the essential cabinets supply power directly to some instrumentation and controls with ESF applications. The only power supply to essential cabinet A is 600V emergency bus C (Division I). The only power supply to essential cabinet B is 600V emergency bus D (Division II). The only other possible way to supply power to an essential cabinet is through crosstied instrument buses. This could occur if the instrument buses were crosstied to each other and were also tied to their respective essential cabinets at the same time. This operation is prohibited by procedures for both units.

The Unit 2 TS contain the same operability and surveillance requirements for the essential cabinets as for the instrument buses. The portion concerning the crosstie breakers is not applicable to the essential cabinets. These controls are adequate to ensure the buses remain operable and meet the single-failure criterion.

The Unit 1 TS do not currently address operability of the essential cabinets. In order to provide controls for the Unit 1 essential cabinets, requirements similar to those found in the Unit 2 TS are being added to the Unit 1 TS. The operability and surveillance requirements which are being proposed for the Unit 1 essential cabinets are the same as those being

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
ADDITION OF ELECTRICAL SYSTEM REQUIREMENTS

BASIS FOR CHANGE REQUEST

proposed for the Unit 1 instrument buses, except for the crosstie breaker verification which is not applicable to the essential cabinets. These controls will be used to ensure the Unit 1 essential cabinets remain operable and in compliance with the single-failure criterion.

The "Bases for Limiting Conditions for Operation" section of the Unit 1 TS is being revised to add brief explanations of the operability and surveillance requirements which are being added for the essential cabinets. These explanations will be very similar in format to the existing bases sections for the other Unit 1 Class 1E electrical equipment.

The designation change from single to double asterisk for Specifications 4.9.D.2 and 4.9.D.3 is strictly administrative.

PROPOSED CHANGE 2:

This proposed change will correct two minor errors in the Unit 1 and 2 TS concerning diesel generator surveillance requirements. These errors were made during the process of preparing submittals for proposed changes which were issued by the NRC as Unit 1 Amendment No. 178 and Unit 2 Amendment No. 119.

The error in the Unit 1 TS is found on page 3.9-2b, Specification 4.9.A.2.a.7. The punctuation of this section is being changed to make the entire section one sentence instead of two.

The error in the Unit 2 TS is found on page 3/4 8-4, Specification 4.8.1.1.2.d.5.b. The proposed change will remove the word "emergency" from this section.

BASIS FOR PROPOSED CHANGE 2:

Specification 4.9.A.2.a.7 of the Unit 1 TS, found on page 3.9-2b, was intended to be comprised of one sentence, but a typographical error broke it into two sentences, thereby making the statement meaningless if read literally. The proposed change combines the two sentences to read:

"At least once per 18 months during shutdown, verify the auto-connected loads to each diesel generator do not exceed 3100 kW."

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATION
ADDITION OF ELECTRICAL SYSTEM REQUIREMENT

BASIS FOR CHANGE REQUEST

The error in the Unit 2 TS is found on page 3/4 8-4, Specification 4.8.1.1.2.d.5.b (5.b). This Specification is very similar to Specification 4.8.1.1.2.d.8.b (8.b), except Specification 5.b involves simulation of a loss of offsite power by itself while Specification 8.b involves simulation of a loss of offsite power in conjunction with an ECCS actuation test signal. While revising these two sections to add the requirement to verify diesel generator voltage and frequency, it was apparently decided to clarify Specification 8.b by changing the phrase "emergency (accident) loads" to read "shutdown (emergency) loads". Since Specification 5.b appears to be similar to Specification 8.b, the word "emergency" was mistakenly added to Specification 5.b as well. However, the word "emergency" does not belong in Specification 5.b because emergency loads include the low pressure ECCS pumps which do not start on a loss of offsite power by itself. Therefore, this proposed change will remove the word "emergency" from Specification 5.b.

PROPOSED CHANGE 3:

This proposed change will correct two typographical errors in the Plant Hatch Unit 1 DG surveillance requirement (SR) specifications. These typographical errors were included in an amendment application, dated March 31, 1986, which was approved and issued by the NRC on August 25, 1987 as part of Amendment 147 to the Plant Hatch Unit 1 TS. The original markup of Unit 1 TS Specifications 4.9.B.1 and 4.9.B.2 required performance of "Surveillance Requirement 4.9.A.2.a.1" in each specification. That change was typed and submitted as "Surveillance Requirement 4.9.A.2.a" which included both parts of that specification. This proposed change will correct this typographical error and make both specifications read "Surveillance Requirement 4.9.A.2.a.1".

BASIS FOR PROPOSED CHANGE 3:

The purpose of the March 31, 1986 submittal was to change the TS for both units to enhance diesel generator (DG) reliability by eliminating some unnecessary and abusive testing requirements per NRC Generic Letter (GL) 84-15. The typographical errors increase required "fast cold" start testing of the DGs and are therefore contrary to the objective of GL 84-15.

Unit 1 Specification 4.9.B.1 contains required actions for the case of one inoperable offsite power source. Unit 1 Specification 4.9.B.2 contains

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
ADDITION OF ELECTRICAL SYSTEM REQUIREMENTS

BASIS FOR CHANGE REQUEST

required actions for the case of one inoperable DG. The original markups of Specifications 4.9.B.1 and 4.9.B.2 required, among other things, performance of SR 4.9.A.2.a.1 which involves slowly starting, accelerating, and loading each DG. During typing, SR 4.9.A.2.a.1 was inadvertently changed to SR 4.9.A.2.a. This had the effect of requiring performance of SR 4.9.A.2.a.2 in addition to SR 4.9.A.2.a.1. SR 4.9.A.2.a.2 involves rapidly starting, accelerating, and loading each DG. Therefore, each operable DG would have to be "slow start" tested and then "fast start" tested, all within 24 hours of entering either Specification 4.9.B.1 or 4.9.B.2.

The basis for this proposed change was described in detail in the March 31, 1986 submittal. As explained in that submittal, the purpose of this change is to enhance DG reliability per the recommendations of the DG manufacturer and NRC GL 84-15.

PROPOSED CHANGE 4:

This proposed change will correct an omission from the Unit 1 TS bases for Specification 4.10.D. On August 28, 1991, the NRC issued Amendment No. 172 to Facility Operating License No. DPR-57 and Amendment No. 112 to Facility Operating License No. NPF-5 for Plant Hatch Units 1 and 2. These amendments consisted of changes to the specifications concerning spent fuel pool water level.

It was recently discovered by the Plant Hatch staff that the original application, dated June 13, 1991, which led to these amendments, did not include a change to one of the bases sections associated with the spent fuel pool water level specification. The current version of Specification 3.10.D requires at least 21 feet of water to be maintained over the top of irradiated fuel assemblies seated in the spent fuel storage racks. The previous version of this specification required 8.5 feet of water to be maintained above irradiated fuel at all times. SR 4.10.D requires the water level to be checked at least once per 7 days. The bases for Specification 3.10.D reiterate the requirement of 21 feet. However, the bases for SR 4.10.D were never changed and still mention the old 8.5 feet requirement. This proposed change will revise this bases section to specify the new 21 feet requirement.

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
ADDITION OF ELECTRICAL SYSTEM REQUIREMENTS

BASIS FOR CHANGE REQUEST

BASIS FOR PROPOSED CHANGE 4:

This proposed change will revise the bases for Specification 4.10.D to be consistent with the specification itself. This change will not affect any of the requirements of Specification 4.10.D.

ENCLOSURE 2

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
ADDITION OF ELECTRICAL SYSTEM REQUIREMENTS

10 CFR 50.92 EVALUATION

The Commission has provided standards in 10 CFR 50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license does not involve a significant hazards consideration if operation of the facility in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

Georgia Power Company has reviewed the proposed amendment and determined its adoption would not result in a significant hazards consideration. The basis for this determination is given below.

Basis For Proposed No Significant Hazards Consideration Determination:

Evaluation of Proposed Change 1:

This change does not involve a significant hazards consideration for the following reasons:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed amendment adds operability and surveillance requirements for Unit 1 instrument buses A and B, and essential cabinets A and B. These buses supply power to instrumentation and controls for engineered safety features (ESF) systems. ESF systems perform functions which mitigate the consequences of analyzed accidents. The addition of operability and surveillance requirements to the Technical Specifications (TS) will increase the probability these buses will be operable in the event of an accident or transient. This will increase the probability the associated ESF systems will also be fully operable

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
ADDITION OF ELECTRICAL SYSTEM REQUIREMENTS

10 CFR 50.92 EVALUATION

and available to prevent the occurrence of an accident or mitigate the consequences of an accident if one were to occur. The proposed changes are consistent with the requirements presented in NRC Generic Letter 91-11. Therefore, implementation of the proposed amendment does not involve a significant increase in the probability or consequences of any accident previously evaluated.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed amendment involves an increase in the degree of assurance the subject buses are operable, however no changes will be made to the mode of operation of the buses. Therefore, the proposed change will not introduce any new failure modes for the buses or for the instrumentation and controls fed by the buses. Therefore, implementation of the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed amendment does not result in a significant reduction in the margin of safety.

As stated above, the proposed amendment adds operability and surveillance requirements for instrument buses A and B, and essential cabinets A and B which supply power to instrumentation and controls for engineered safety features (ESF) systems. This will increase the probability these ESF systems will be fully operable and available to mitigate the consequences of an accident or transient and prevent exceeding any safety limit. Therefore, implementation of this amendment will not result in a significant reduction in the margin of safety.

Evaluation of Proposed Change 2:

This change does not involve a significant hazards consideration for the following reasons:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Since these changes are purely editorial, they do not change the intent of the surveillance requirements or the ability of the diesel

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
ADDITION OF ELECTRICAL SYSTEM REQUIREMENTS

10 CFR 50.92 EVALUATION

generators to fulfill their intended safety function. All assumptions made in the accident analyses concerning the role of the diesel generators in mitigating accidents involving a loss of offsite power are still valid, and the resulting consequences of such postulated accidents remain unchanged. Therefore, these changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Since these changes are purely editorial, they do not change the performance of the surveillance requirements or the mode of operation of the diesel generators. Therefore, these changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed amendment does not result in a significant reduction in the margin of safety.

Since these changes are purely editorial, they have no impact on the ability of the diesel generators to perform their intended safety function. The ability of the diesel generators to aid in preventing safety limits from being exceeded is not affected. Therefore, these changes do not result in a significant reduction in the margin of safety.

Evaluation of Proposed Change 3:

This change does not involve a significant hazards consideration for the following reasons:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

This change is correction of a typographical error made during preparation of a submittal dated March 31, 1986. The changes proposed in that submittal were approved and issued by the NRC on August 25, 1987. The 10 CFR 50.92 evaluation contained in the March 31, 1986 submittal is applicable to this proposed change and details the reasons why this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
ADDITION OF ELECTRICAL SYSTEM REQUIREMENTS

10 CFR 50.92 EVALUATION

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

This change is correction of a typographical error made during preparation of a submittal dated March 31, 1986. The changes proposed in that submittal were approved and issued by the NRC on August 25, 1987. The 10 CFR 50.92 evaluation contained in the March 31, 1986 submittal is applicable to this proposed change and details the reasons why this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed amendment does not result in a significant reduction in the margin of safety.

This change is correction of a typographical error made during preparation of a submittal dated March 31, 1986. The changes proposed in that submittal were approved and issued by the NRC on August 25, 1987. The 10 CFR 50.92 evaluation contained in the March 31, 1986 submittal is applicable to this proposed change and details the reasons why this change does not result in a significant reduction in the margin of safety.

Evaluation of Proposed Change 4:

This change does not involve a significant hazards consideration for the following reasons:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

This proposed change only affects the bases section of the TS. Since no changes are being proposed to any operability, action or surveillance requirements, there is no impact on the operability of any safety-related equipment taken credit for in any accident evaluation. Therefore, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
ADDITION OF ELECTRICAL SYSTEM REQUIREMENTS

10 CFR 50.92 EVALUATION

This proposed change only affects the bases section of the TS. Since no changes are being proposed to any operability, action or surveillance requirements, there will be no changes to any mode of operation of any systems or equipment. Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed amendment does not result in a significant reduction in the margin of safety.

This proposed change only affects the bases section of the TS. Since no changes are being proposed to any operability, action or surveillance requirements, there will be no impact on any safety limits or limiting safety systems settings. Therefore, the proposed amendment does not result in a significant reduction in the margin of safety.