POSITION INDICATION SYSTEM-SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.1.3.3 One rod position indicator (excluding demand position indication) shall be OPERABLE and capable of determining the control rod position within ± 12 steps for each shutdown or control rod not fully inserted.

APPLICABILITY: MODES 3*#, 4*# and 5*#.

ACTION:

With less than the above required position indicator(s) OPERABLE, immediately open the Reactor Trip System breakers.

SURVEILLANCE REQUIREMENTS

4.1.3.3 Each of the above required rod position indicator(s) shall be determined to be OPERABLE by performance of an ANALOG CHANNEL OPERATIONAL TEST at least once per 18 months. The Reactor Trip System Breakers can be closed in order to perform this surveillance.

*With the Reactor Trip System breakers in the closed position, the Control Rod Drive System capable of rod withdrawal.
#See Special Test Exception 3.10.5.

Attachment II

Justification and Safety Analysis

The proposed change of the Technical Specifications is concerned with the Surveillance Requirements associated with Specification 3/4.1.3.3, Rod Position Indication System.

The proposed change to Surveillance Requirement 4.1.3.3 will add the statement, "The Reactor Trip System Breakers can be closed in order to perform this surveillance", and to the applicability footnote specify that the Control Rod Drive System is capable of rod motion. The Analog Channel Operational Test is specified in the Specification for this surveillance and is used in conjunction with rod motion to verify operability of the Rod Position Indicators. This operation requires one worker to be in the vessel head area for approximately thirty minutes. If a rod position indicator has been declared inoperable. the required Action is to immediately open the Reactor Trip System Breakers. In this situation it becomes impossible to move the rods. To perform the surveillance without moving the rods requires six workers approximately three days in the vessel head area to make all required connections and perform the test. This proposed change would allow the Reactor Trip System Breakers to be closed to verify Rod Position Indicator operability by rod motion, which would be consistent with ALARA considerations.

The proposal to change the footnote is to specify that the Specification does not apply if the rods are incapable of being withdrawn. This is of no safety concern as the Rod Position Indicators are not needed if the rods cannot be withdrawn and may prevent unnecessary opening the Reactor Trip System Breakers.

The proposed change would have no impact upon plant safety. The specification is applicable in Modes 3, 4, and 5 (Hot Standby, Hot Shutdown, and Cold Shutdown, respectively), all of which specify a subcritical condition. The proposed change would not affect the required shutdown margin that must be maintained in accordance with Technical Specifications 3/4.1.1.1 and 3/4.1.1.2 (Shutdown Margin for Tavg >200°F and Shutdown Margin for Tavg $\leq$200°F, respectively). The proposed change would only allow the Reactor Trip System Breakers to be closed to perform the required surveillance; the Action statement in the event of an inoperable indicator remains the same.

The proposed change of Technical Specification 3/4.1.3.3 is a needed clarification of the Surveillance Requirements that does not involve a reduction in any margin of safety and is consistent with ALARA considerations.

Attachment III

ANALYSIS OF SIGNIFICANT HAZARDS CONSIDERATION

Pursuant to the requirements of 10CFR50.91, this analysis provides a determination that the proposed amendment of the Technical Specification does not involve any significant hazards consideration, as defined by 10CFR50.92.

The proposed change of Technical Specification 3/4.1.3.3 supplies a needed clarification to the surveillance Requirements. The proposed amendment is consistent with ALARA considerations, and has no effect upon the required shutdown margin that must be maintained.

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 reductin in a margin of safety.

Based upon the preceding analysis, Duke Power Company concludes that the proposed amendments do not involve a significant hazards consideration.