ATTACHMENT 1

PROPOSED TECHNICAL SPECIFICATION CHANGE

FOR UNIT 1

TABLE 3.3-7

SEISMIC MONITORING INSTRUMENTATION

INSTRUMENTS AND SENSOR LOCATIONS	MEASUREMENT RANGE	MINIMUM INSTRUMENTS OPERABLE
1. Triaxial Time-History Accelerographs		
a. Containment Mat*	0 - 1.0 g	1
b. Containment Operating Level*	0 - 1.0 g	1
2. Triaxial Peak Accelerographs		
a. RHR Heat Exchanger	0 - 5.0 g	1
b. Safety Injection pipe	0 - 5.0 g	1
c. Component Cooling Heat Exchanger	0 - 5.0 g	1
3. Triaxial Seismic Switches		
a. Containment Mat*	NA	NA
4. Triaxial Response-Spectrum Recorders		
a. Containment Mat*	1 - 30 Hz	1
b. Auxiliary Building Mat	1 - 30 Hz	1
c. RHR Pipe Support	1 - 30 Hz	1
d. Component Cooling Heat Exchanger Support	1 - 30 Hz	1

*With reactor control room indication

TABLE 4.3-4

SEISMIC MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INSTRUMENTS AND SENSOR LOCATIONS	CHANNEL CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST
1. Triaxial Time-History Accelerographs			
a. Containment Mat	M*	R	SA*
b. Containment Operating Level	M*	R	SA*
2. Triaxial Peak Accelerographs			
a. RHR Heat Exchanger	NA	R	NA
b. Safety Injection Pipe	NA	R	NA
c. Component Cooling Heat Exchanger	NA	R	NA
3. Triaxial Seismic Switches			
a. Containment Mat	NA	R	SA
4. Triaxial Response-Spectrum Recorders			
a. Containment Mat	NA	R	SA**
b. Auxiliary Building Mat	NA	R	NA
c. RHR Pipe Support	NA	R	NA
d. Component Cooling Heat Exchanger Support	NA	R	NA

*Except seismic trigger
**Testing will include annunciator circuit only.

ATTACHMENT 2

SAFETY EVALUATION

SAFETY EVALUATION

The current surveillance requirements for seismic monitoring instrumentation require semiannual channel functional tests for the four (4) triaxial response recorders listed in Technical Specifications Table 4.3-4. Three of these recorders (the Auxiliary Building Mat, RHR Pipe Support and Component Cooling Heat Exchanger Support) are passive devices with no remote indications. Guidance provided by Regulatory Guide 1.12, 1974, ANSI/ANS Standard 2.2, 1978, and the recorder manufacturer, Engdahl Enterprises, indicate that these recorders do not require a channel functional test. Table 1 of ANSI/ANS Standard 2.2 on frequency of maintenance specifically recommends that no channel functional test be performed for self contained, passive instruments. The physical act of testing may also cause significant damage to the device. The proposed change will revise the specifications to be consistent with current regulatory guidance and the manufacturer's recommendations.

The Containment Mat triaxial response recorder is an inaccessble, active device with a remote indication (annunciator). Present surveillance requirements and ANSI/ANS Standard 2.2, 1978, require semiannual functional testing. Because this device is normally inaccessable during plant operations, testing every six months would require the use of protective clothing, self contained breathing apparatus and limited access time (ALARA concerns). The manufacturer (Engdahl) agrees that any testing under these conditions could damage this sensitive equipment. The proposed change is to limit the semiannual functional test requirement to the testing of the remote indication (annunciator) only. (Note: the

refueling channel calibration requirement remains unchanged). It should be noted that we currently perform an instrumentation department PM, on a six month frequency, to visually inspect the containment mat triaxial recorders.

An additional change is proposed to Technical Specifications Table 3.3-7, Item 4. The listed instrument measurement range for the triaxial response- spectrum recorders is 0g - 34g. The correct range should be 1.0 Hz - 30 Hz. This is consistent with the ANSI/ANS Standard 2.2, 1978 and with Section 3.7.4.5 of the North Anna UFSAR. This proposed change is administrative to correct an error in the existing specifications.

50.59 and Significant Hazards Review

The proposed changes do not alter the operability requirements of the triaxial recorders and are largely administrative in nature in order to reflect actual instrument requirements. In the modification of the semiannual functional test for the containment mat recorder, the proposed change is intended to enhance instrument availability by eliminating a test that will likely damage the equipment. Operability of the remote indication will be verified by performance of a functional test.

Pursuant to 10CFR50.59, we have reviewed the proposed Technical Specification changes and have concluded that no unreviewed safety question exists. The possibility of occurrence or the consequence of a malfunction of the equipment previously evaluated in the UFSAR is not

increased. The possibility of a different type of accident other than discussed in the UFSAR has not been created and the margin of safety as described in the BASES Section of any part of Technical Specifications has not been reduced.

This change does not pose a significant hazards consideration as defined in 10 CFR 50.92. The Commission has provided examples (48FR14870) of changes that constitute no significant hazards consideration: example (i) consists of purely administrative changes and example (vi) includes changes which either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan.

The proposed change is similar to example (i) in that it corrects an incorrectly specified frequency range for the triaxial response - spectrum recorders. The correct range is specified in the North Anna UFSAR and is also consistent with applicable ANSI standards. Therefore, this portion of the change is administrative.

The proposed change is similar to example (vi) in that the change appears to reduce a safety margin in some way; i.e., deletion of periodic functional testing. However, the deletion of the periodic functional testing for the components is clearly within the acceptable criteria (Regulatory Guides, ANSI Standards and manufacturer's recommendations)

for the components. In fact, both current regulatory guidance and the manufacturer's recommendations indicate that the functional test requirement may be detrimental to proper equipment functioning. Assurance that the equipment will perform to its intended function continues to be provided through periodic calibration requirements. Thus, this portion of the change is similar to example (vi), and we conclude that no significant hazards considerations are involved in the proposed change.