

TABLE 3.3-3 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

FUNCTIONAL UNIT	TOTAL NO. OF CHANNELS	CHANNELS TO TRIP	MINIMUM CHANNELS OPERABLE	APPLICABLE MODES	ACTION
8. Auxiliary Feedwater (Continued)					
c. Stm. Gen. Water Level-Low-Low					
1) Start Motor-Driven Pumps	4/stm. gen.	2/stm. gen. in any operating stm. gen.	3/stm. gen. in each operating stm. gen.	1, 2, 3	19*
2) Start Turbine-Driven Pump	4/stm. gen.	2/stm. gen. in any two operating stm. gen.	3/stm. gen. in each operating stm. gen.	1, 2, 3	19*
d. Safety Injection-Start Motor-Driven Pumps	See Item 1. above for all Safety Injection initiating functions and requirements.				
e. Loss-of-Offsite Power-Start Motor-Driven Pumps and Turbine-Driven Pump	6-3/bus	2/bus either bus	2/bus	1, 2, 3	15*
f. Trip of All Main Feedwater Pumps-Start Motor-Driven Pumps <sup>A</sup> (MFWP)	2-1/MFWP <del>2/pump</del>	2-1/MFWP <del>1/pump</del>	2-1/MFWP <del>1/pump</del>	1, 2#	X 28

CATAMBA - UNITS 1 & 2

8803160261 880311  
PDR ADDCK 05000413  
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TABLE 3.3-3 (Continued)

ACTION STATEMENTS (Continued)

- ACTION 20 - With less than the Minimum Channels OPERABLE, within 1 hour determine by observation of the associated permissive status light(s) that the interlock is in its required state for the existing plant condition, or apply Specification 3.0.3.
- ACTION 21 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, be in at least HOT STANDBY within 6 hours and in at least HOT SHUTDOWN within the following 6 hours; however, one channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1 provided the other channel is OPERABLE.
- ACTION 22 - With the number of OPERABLE channels one less than the Total Number of Channels, restore the inoperable channel to OPERABLE status within 48 hours or be in at least HOT STANDBY within 6 hours and in at least HOT SHUTDOWN within the following 6 hours.
- ACTION 23 - With the number of OPERABLE channels one less than the Total Number of Channels, restore the inoperable channel to OPERABLE status within 48 hours or declare the associated valve inoperable and take the ACTION required by Specification 3.7.1.4.
- ACTION 24 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE, restore the inoperable channel to OPERABLE status within 48 hours, or initiate and maintain operation of the Control Room Area Ventilation System with flow through the HEPA filters and activated carbon adsorbers. 2
- ACTION 25 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, be in at least HOT STANDBY within 6 hours.
- ACTION 26 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, be in at least HOT STANDBY within 6 hours and in at least HOT SHUTDOWN within the following 6 hours.
- ACTION 27 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, be in at least HOT STANDBY within 6 hours; however, one channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1 provided the other channel is OPERABLE.

INSERT ACTION 28 or place on new page 3/4 3-2.6a

INSERT FOR PAGE 3/4 3-26

ACTION 28 - With the number of OPERABLE channels one less than the Total Number of Channels, STARTUP and/or POWER OPERATION may continue provided the inoperable channel is placed in the tripped condition within 4 hours.

ATTACHMENT II  
DISCUSSION AND NO SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

## DISCUSSION AND NO SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

The attached change to Table 3.3-3, item 8.f - Trip of All Main Feedwater Pumps - Start Motor-Driven Pumps, is intended as 1) clarification of the existing design and operation of this ESF actuation, and 2) an addition of a new ACTION statement for the ESF instrumentation.

The clarification is needed to clearly and correctly list the total number of channels, channels to trip, and minimum channels operable for the automatic start of the motor driven auxiliary feedwater pumps (MDCAP) on trip of all main feedwater pumps (MFWP). The current requirements listed in Table 3.3-3, item 8.f state that 1 channel/pump is the number of channels needed to trip as well as the minimum number of channels required operable. The item also states that the total number of channels/pump is two (2). All three of these statements are unclear as to which pump (either MDCAP or MFWP) they are referring to.

The operation of the automatic start of the MDCAPs on the trip of all MFWPs is accomplished by two pressure sensors one on each of the two MFWPs. These sensors monitor the oil pressure of the MFWP and will trip upon sensing the oil pressure at 60 psig and decreasing. System operation is such that upon both sensors sensing the oil pressure at the low setpoint (60 psig and decreasing) both of the MDCAPs will automatically start.

The proposed change to the Technical Specification is based on the above description of the system operation and would change the requirements of the system to the following:

2 -1/MFWP

This would be for all three (3) items (Total Number of Channels, Channels to Trip, and Minimum Channels Operable) and would mean that there exists 2 channels, one on each of the two MFWPs, and those two sensors are needed for the system to perform its function.

In conjunction with this clarification a change to the Action Statement for this Technical Specification is also proposed. Presently the Action Statement for item 8.f. of Table 3.3.3 is ACTION 25.

ACTION 25 states - with the number of OPERABLE channels one less than the Minimum Channels Operable requirement, be in at least HOT STANDBY within 6 hours.

The proposed new Action Statement would be ACTION 28 and would read as follows:

ACTION 28 - With the number of OPERABLE channels one less than the Total Number of Channels, STARTUP and/or POWER OPERATION may proceed provided the inoperable channel is placed in the tripped condition within 4 hours.

The functional capability of this system is maintained as required in the bases of Technical Specification (B 3/4 3.1) with one channel inoperable provided that the inoperable channel is placed in the trip condition. System operation logic with both channels operable requires that 2 out of the 2 operable channels (n out of n logic) sense a trip of the MFWPs prior to the automatic start of the MDCAPs. The same level of conservatism in the system logic is maintained under the proposed Action Statement where it would be required that with one channel operable and the other channel inoperable but in the tripped condition that the

DISCUSSION AND NO SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS (Continued)

remaining operable channel (n out of n logic) sense a trip of a MFWP prior to the automatic start of the MDCAPs. This change in the Action Statement has no impact on the accident analysis in the FSAR given the fact that the automatic start of MDCAPs on trip on all MFWPs was not taken credit for in the accident analysis.

These changes are intended to improve the Technical Specification by clarifying the system requirements and to allow continued startup and/or power operations while maintaining the functional capability of this system; no adverse safety concerns are involved.

10 CFR 50.92 (c) states that "a proposed amendment... involves no significant hazards considerations, 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.

The proposed changes do not involve a significant increase in the probability or consequences of a previously evaluated accident. The changes are provided for clarification as to which pumps are being addressed. The new ACTION statement is appropriate since it will allow continued operation yet maintain the level of safety by requiring the inoperable channel to be placed in the safe (tripped) position.

The proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes are intended as clarification to the existing requirements. The ACTION statement will not allow operation of the station in any unanalyzed condition.

The proposed changes do not involve a significant reduction in a margin of safety. The amendment will clarify the requirements as they pertain to the instrumentation associated with the MFWPs. The new ACTION statement will be adequate to ensure that the appropriate ESF actions will occur.

Based upon the above discussion, Duke Power concludes that the proposed amendment does not involve any Significant Hazards Consideration.