

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

PRAIRIE ISLAND NUCLEAR GENERATING PLANT

Docket No. 50-282
50-306

REQUEST FOR AMENDMENT TO
OPERATING LICENSE NOS. DPR-42 & DPR-60

License Amendment Request Dated March 17, 1986

Northern States Power Company, a Minnesota corporation, requests authorization for changes to the Technical Specifications as shown on the attachments labeled Exhibit A and Exhibit B. Exhibit A describes the proposed changes along with reasons for the change. Exhibit B is a set of Technical Specification pages incorporating the proposed changes.

This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By David Musolf
David Musolf
Manager - Nuclear Support Services

On this 17th day of March, 1986 before me a notary public in and for said County, personally appeared David Musolf, Manager - Nuclear Support Services, and being first duly sworn acknowledged that he is authorized to execute this document on behalf of Northern States Power Company, that he knows the contents thereof and that to the best of his knowledge, information and belief, the statements made in it are true and that it is not interposed for delay.

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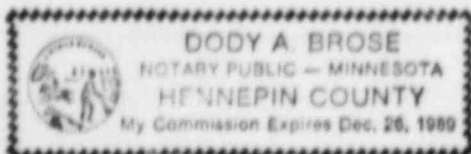


Exhibit A

Prairie Island Nuclear Generating Plant

License Amendment Request Dated March 17, 1986
Evaluation of Proposed Changes to the
Technical Specifications Appendix A of
Operating License DPR-42 and DPR-60

Pursuant to 10 CFR Part 50, Sections 50.59 and 50.90, the holders of
Operating Licenses DPR-42 and DPR-60 hereby propose the following changes
to Appendix A, Technical Specifications.

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1. LCO Action Statements

In response to a recommendation from the Prairie Island NRC Resident Inspector, Section 2 and 3 of the Prairie Island Technical Specifications has been reviewed to determine if action statements have been provided for each Limiting Condition for Operation (LCO). Action statements have been added where necessary. Changes are discussed, section by section, on the following pages.

Since the action statements affected a large number of sections of the Technical Specifications, it was an ideal time to address other concerns with the specifications. Section 3.1 has been amended several times since the original specifications were issued and a reorganization of Section 3.1 was in order. In addition, the format of the specifications were reviewed for consistency and were modified appropriately. Changes are discussed, section by section, on the following pages. However, some of these changes are made to every section, and rather than repeat their description under each section, they are discussed below. These changes will be referenced, using General Change I, II etc., in the section by section evaluations.

General Change I

Proposed Change

Add required times, 1) to initiate action to place the unit in Hot Shutdown (1 hour), 2) to place the unit in Hot Shutdown (6 hours), and 3) to go from Hot Shutdown to Cold Shutdown (30 hours).

Reason for Change

This change will make the Technical Specifications more consistent with the Standard Technical Specifications.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes add action statements consistent with the Standard Technical Specifications and therefore will not significantly affect the probability or consequences of previously analyzed accidents.

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

The proposed changes only add maximum allowed times to change modes. Therefore, no safety analyses are affected; no new or different accident type is created; and the accident analyses presented in the Updated Safety Analysis Report remain bounding.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes do not involve a significant reduction in the margin of safety, because the proposed action statements conform to the guidance provided in the Standard Technical Specifications.

These changes consist of additional restrictions not presently included in the Prairie Island Technical Specifications. Therefore, based on these considerations, we have concluded that this change does not involve a significant hazards consideration.

General Change II

Proposed Change

Replace "A reactor shall not be made or maintained critical nor shall it be heated or maintained above . . ." with "A reactor shall not be made or maintained critical nor shall reactor coolant system average temperature exceed . . ."

Reason for Change

The proposed change more clearly identifies what parameter the specification is referring to and deletes wording that is not needed in the text. The deleted wording has caused confusion with respect to the their applicability during plant cooldown.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes are administrative in nature and therefore will not effect the probability or consequences of previously analyzed accidents.

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

The proposed changes are administrative in nature. No safety analyses are affected. No new or different accident type is created. The accident analyses presented in the Updated Safety Analysis Report remain bounding.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes involve only administrative changes to the Technical Specifications. No safety margins are affected.

This change is an administrative change. For these reasons, we have concluded that this change does not involve a significant hazards consideration.

General Change III

Proposed Change

The Standard Technical Specifications allow the plant 6 hours to cooldown from operating temperature to 350°F. Twelve hours is requested for changing from Hot Shutdown mode to below 350°F.

Reason for Change

The 6 hours used in the Standard Technical Specifications would be difficult to meet under all circumstances. Prior to beginning the cooldown to 350°F, the plant is borated to the cold xenon free boron concentration. Borating, mixing and sampling generally takes 2 hours. The plant is then cooled down at 50°F/hr to 350°F. The average total time for these operations is approximately 6 hours. The proposed twelve hours will give the plant the time necessary to perform these operations in a normal controlled manner without having to rush to meet the 6 hours.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

This change will not result in a significant increase to the probability or consequences of previously analyzed accidents. It conforms with the intent of the Standard Technical Specifications (STS). We believe, the intent of the 6 hours in the STS was to allow the plant to shutdown in an orderly manner without allowing the plant to operate too long in a degraded

condition. In order to shutdown Prairie Island in the normal controlled manner, up to 12 hours is necessary.

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

The proposed changes only involves the time allowed to cool the plant from Hot Shutdown to 350°F. No safety analyses are affected. No new or different accident type is created. The accident analyses presented in the Updated Safety Analysis Report remain bounding.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

This additional allowed time to be in a degraded condition will not significantly affect the margin of safety.

While these changes may result in some change in the probability or consequences of a previously analyzed accident or may change in some way a safety margin, they will not involve a significant hazards consideration for the reasons stated above.

General Change IV

Proposed Changes

Replace "out of service" and "removed from service" with "inoperable" in the action statements.

The wording of action statements has also been simplified, for example (Specification 3.2.D.1):

Old wording: One of the operable charging pumps may be removed from service provided the specified number of charging pumps are again operable within 24 hours.

Proposed wording: One charging pump may be inoperable for 24 hours.

Reason for Changes

The terms "out of service" and "removed from service" are not defined. These terms have been replaced with the term "inoperable" since "Operable" is defined in Section 1.0 of the Technical Specifications. The use of "inoperable" provides consistency within the Technical Specifications and with the Standard Technical Specifications.

The proposed simplified wording has the same meaning but is more concise.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes are administrative in nature and therefore will not effect the probability or consequences of previously analyzed accidents.

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

The proposed changes are administrative in nature. No safety analyses are affected. No new or different accident type is created. The accident analyses presented in the Updated Safety Analysis Report remain bounding.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes involve only administrative changes to the Technical Specifications. No safety margins are affected.

This change is an administrative change. Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

General Change V

Proposed Change

All the words defined in the Section 1.0 have been capitalized in Section 3, in the Bases, and in the Section 4 pages revised by this amendment.

Reason for Change

This will aid the operator as well as other users by clearly identifying those words which are defined in the Technical Specifications and is consistent with Standard Technical Specification format.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes are administrative in nature and therefore will not effect the probability or consequences of previously analyzed accidents.

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

The proposed changes are administrative in nature. No safety analyses are affected. No new or different accident type is created. The accident analyses presented in the Updated Safety Analysis Report remain bounding.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes involve only administrative changes to the Technical Specifications. No safety margins are affected.

This change is an administrative change. Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

Section by Section Discussion

The changes listed below incorporate the format and organizational changes described above. Reasons for changes outside the scope of the changes discussed above will be addressed specifically below. Specific reference to the General Changes will be made where appropriate.

Table of Contents

Proposed Changes

The Table of Contents has been revised to reflect all the changes included in this amendment request.

The list of definitions in the Table of Contents has been deleted since this amendment is proposing that the definitions be placed in alphabetical order.

Reason for Change

This change will make the Table of Contents consistent with the proposed Technical Specifications changes.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes are administrative in nature and therefore will not effect the probability or consequences of previously analyzed accidents.

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

The proposed changes are administrative in nature. No safety analyses are affected. No new or different accident type is created. The accident analyses presented in the Updated Safety Analysis Report remain bounding.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes involve only administrative changes to the Technical Specifications. No safety margins are affected.

This change is an administrative change. Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 1.0

Proposed Changes

The definitions section has been reorganized. Identification letters associated with each definition have been deleted and the definitions put in alphabetical order. "Shutdown" and "Instrument Surveillance" have been broken up with their sub-definitions becoming definitions.

The introductory sentence has been changed to read:

Frequently used terms are defined so that a uniform interpretation of the specifications may be achieved.

"Auxiliary Building Special Ventilation Zone Integrity" is a new definition which is discussed in the evaluation of Section 3.6 changes. This change affects the definition of containment integrity.

The definition of "Channel Calibration" was changed, deleting the following words: "encompass the entire channel, including equipment action, alarm, or trip, and shall be deemed to."

"Containment System Integrity" has been changed to "Containment Integrity." "Containment" was inserted following "non-automatic" in Paragraph 1 of the definition of Containment Integrity to clarify that containment isolation valves are being referenced.

The definition of "Dose Equivalent Iodine" and "E-bar" have been transferred from old Section 3.1.D.2 to this section.

The wording in the definition of "Limiting Condition for Operation" has been simplified and an "(s)" has been added to the title.

"Members of the Public" has been changed to "Members of the General Public."

The last eight words of the definition of "operable" has been deleted and "- Operability" has been added to the title.

The wording in the definition of "Physics tests" has been clarified. "Conducts to" has been deleted and "tests that" has been inserted in its place.

"Rated Power" has been changed to "Rated Thermal Power." This definition was revised to be consistent with the Standard Technical Specification.

The definition of "reactor critical" has been deleted.

"Refueling Operations" and "Refueling Shutdown" have been replaced by new definitions of "Refueling" and "Core Alterations." These changes are discussed in the evaluation of Section 3.8.

The definition of "Safety Limits" has been updated to refer to the "NRC" rather than the "AEC." It has also been simplified by deleting "those process variables that must be controlled" and replacing it with "reactor operations".

The definition of "Site Boundary" has been clarified by deleting the words "Means a line" and replacing it with "The Site Boundary is a border".

"Shield Building Integrity" is a new definition which is discussed in the evaluation of Section 3.6. This change affects the definition of containment integrity in that the old definition of containment integrity contained conditions that apply to the Shield Building Integrity.

The definition of "Thermal Power" was changed to be consistent with the definition of Rated Thermal Power.

Reason for Changes

Reordering the definitions is being proposed to make the definitions easier to use. The identification letters have been dropped, since the definitions are not referred to by that letter identifier. This change will also facilitate the addition of new definitions in

alphabetical order without re-lettering all the definitions.

The introductory sentence has been changed to correct the incorrect use of "infrequently."

The definition of "Reactor Critical" has been deleted since it states the obvious.

The definitions of "Dose Equivalent Iodine" and "E-Bar" have been moved from old Section 3.1.D.2 to Section 1.0 since they are definitions.

The titles "Members of the General Public" and "Containment Integrity" were changed to be consistent with the usage in the specifications.

"Rated Thermal Power" is consistent with the Standard Technical Specifications and consistent with the term "Thermal Power." Changes were made in the Limiting Conditions for Operation to use the terms "Rated Thermal Power" and "Thermal Power" as appropriate.

Changes to the introductory sentences and the definitions of "Channel Calibration", "Limiting Condition(s) for Operation", "Physics Tests", "Operable - Operability", "Safety Limits" and "Site Boundary" were made to clarify and simplify the existing definitions.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes are administrative in nature and therefore will not effect the probability or consequences of previously analyzed accidents.

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

The proposed changes are administrative in nature. No safety analyses are affected. No new or different accident type is created. The accident analyses presented in the Updated Safety Analysis Report remain bounding.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes involve only administrative changes to the Technical Specifications. No safety margins are affected.

This change is an administrative change. Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 2.0

General Change V has been made to this section. See Item 2 of this exhibit for discussion of additional changes to Section 2.0.

Section 3.0

Proposed Change

Add Section 3.0 to the Technical Specifications.

Add a Bases section for 3.0.

General Change I applies to this section.

Reason for Change

Section 3.0 has been added to better define noncompliance with a specification, and to provide actions to be taken when an LCO is not met and required actions are not specified, or cannot be satisfied.

A bases section was also added to explain the use of the term "at least HOT SHUTDOWN" and explain the required times for being in different modes.

Words similar to specification 3.0.C have been added to each section where it applies. This duplication will reinforce the requirement.

Sections 3.0.A, 3.0.B, and 3.0.C are consistent with STS Sections 3.0.1, 3.0.2, and 3.0.3. Section 3.0.4 of the STS is not applicable to the Prairie Island Technical Specifications since modes are not used in the same way as in the STS and requirements for changing modes are specified in the individual specifications.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes add action statements consistent with the Standard Technical Specifications and therefore will not significantly affect the probability or consequences of previously analyzed accidents.

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

The proposed changes only specify the action to be taken when outside the bounds of the Section 3 action statements. Therefore, no safety analyses are affected; no new or different accident type is created; and the accident analyses presented in the Updated Safety Analysis Report remain bounding.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes do not involve a significant reduction in the margin of safety, because the proposed action statements conform to the guidance provided in the Standard Technical Specifications.

These changes consist of additional restrictions not presently included in the Prairie Island Technical Specifications. Therefore, based on these considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 3.1

Proposed Change

Change the applicability requirements so that these requirements only apply when there is irradiated fuel in the containment.

Reason for Change

The applicability of this section was clarified to apply only when irradiated fuel is in the containment. This will allow more flexibility during full core offloads.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

It is clear there are no safety concerns with equipment covered by this section when there is no irradiated fuel in the containment. Therefore, this change will not effect the probability or consequences of previously analyzed accidents.

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

This change will only be applicable when there is no fuel in the containment. Therefore, no safety analyses are affected; no new or

different accident type is created; and the accident analyses presented in the Updated Safety Analysis Report remain bounding.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

No safety margins are affected, since this change is only applicable when there is no fuel in the containment.

Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 3.1.A.1

Proposed Changes

General Changes I, II, III and V apply to this section.

Section 3.1.A.1 has been reorganized to consolidate all the reactor coolant circulation specifications in one section, similar to STS Section 3.4.1, Reactor Coolant Loops and Coolant Circulation. Decay heat removal specifications (old Section 3.1.A.3) and Reactor Coolant Pump (RCP) starting requirements (old Section 3.1.G.3) were added to this section. The requirements were ordered starting with the most restrictive specification (highest mode) and ending with least restrictive specification (lowest mode).

New Section 3.1.A.1.a is the old Section 3.1.A.1.b.

New Section 3.1.A.1.b is a combination of the old Section 3.1.A.1.a, 3.1.A.1.c and 3.1.A.1.d with the shutdown times added. Requirements of the old section 3.1.A.1.c, requiring an RHR or RCP to be in operation at all times, were added to this section by requiring one RCP to be in operation when above 350°F. The requirement to have the trip breakers open when no RCPs are running was added.

New Section 3.1.A.1.c.(1) is the old Sections 3.1.A.1.c and 3.1.A.3.a. Requirements of the old Section 3.1.A.1.c were added to this section by requiring one RHR pump to be in operation when below 350°F. New Sections 3.1.A.1.c.(2) and (3) replaces old Section 3.1.A.3.b.

New Section 3.1.A.1.c.(4) is the old Section 3.1.G.3. This requirement was moved to this section since it dealt with the operation of RCPs. The proposed specification is more restrictive since an RCP is now required along with a Steam Generator as an acceptable method of decay heat removal. This was done to conform with the STS and since an RHR or RCP is required to be in operation at all times.

New Section 3.1.A.1.d is a combination old Sections 3.1.A.3.c and 3.1.A.1.c. "During maintenance" has been deleted to be consistent with the Standard Technical Specifications. "Restore reactor coolant system level above the vessel flange and to" has been deleted which is consistent with the Standard Technical Specifications. "Immediate" has also been deleted.

Reason for Change

These changes are intended to clarify this specification and make it easier for the operator to understand and to use.

The requirement concerning the opening of the reactor trip breakers when no reactor coolant pumps are running was added to preclude the possibility of a rod withdrawal accident with no primary coolant flow.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes are either administrative in nature or are more restrictive, and therefore will not effect the probability or consequences of previously analyzed accidents.

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

The proposed changes are either administrative in nature or are more restrictive. No safety analyses are affected. No new or different accident type is created. The accident analyses presented in the Updated Safety Analysis Report remain bounding.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes involve administrative changes or are more restrictive. No safety margins are affected.

The requirement concerning the opening of the reactor trip breakers when no reactor coolant pumps are running was added to preclude the possibility of a rod withdrawal accident with no primary coolant flow.

The changes to new Section 3.1.A.1.c.(4) are more restrictive since an RCP is required along with a steam generator as an acceptable method of decay heat removal.

The changes to new Section 3.1.A.1.d will provide consistency with the Standard Technical Specifications and resolve training concerns associated with recent examinations. Recent SRO and RO examinations have required knowledge of all Technical Specifications requiring immediate action. Therefore, use of the term "immediate" should be reserved for those situations which truly require immediate action.

The remainder of the proposed changes are purely administrative changes intended to clarify and simplify the Technical Specification requirements.

Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 3.1.A.2

All changes made to this section are covered by General Changes I, II and V.

Section 3.1.A.3

Proposed Changes

General Changes I, II, III and V apply to this section.

- a. Section 3.1.A.3 includes all the reactor coolant system pressure control specifications, which previously existed in 3.1.A.4, 5 and 3.1.G.1.
- b. Section 3.1.A.3.a is a combination of the old Sections 3.1.A.4.a, b and c.

The existing 18 and 12 hours for getting to hot shutdown have been removed in lieu of the 6 hour STS time requirement and the additional requirement to reduce temperature below 350°F has been added.

The pressurizer operability requirement for "at least one operable spray" has been deleted.

- c. New Section 3.1.A.3.b. is old Section 3.1.A.4.d.
- d. New Sections 3.1.A.3.c.(1) and (2) are a combination of the old Sections 3.1.A.4.e, f and g.
- e. New Section 3.1.A.3.c.(3) is the old Section 3.1.G.1. Old Section 3.1.G.2 was moved to the bases. These requirements were included in Section 3.1.A.3.c to consolidate all the pressurizer relief valve specifications into one section. The wording of this specification has been clarified by replacing "the low pressure setpoint selected (enabled)" with "the overpressure protection system enabled."

Reasons for Change

- a. This change consolidates the pressure control requirements.
- b. The requirement to reduce temperature below 350°F has been added so that the action statement places the plant in a mode where the equipment is not required to be operable.

The pressurizer operability requirement for "at least one operable spray" has been deleted since the spray is not required for operability.

- c. In Section 3.1.A.3.b the action statement has been separated from the requirements for clarity.
- d. The present specification requires the plant to be placed in cold shutdown under certain conditions. This is unnecessary since the valves are only required to be operable above 350°F per 3.1.A.1.c.(1). The proposed action statement only requires the plant to reduce reactor coolant temperature below 350°F since the equipment is only required to be operable above 350°F.
- e. These changes have been made to clarify this specification.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

Change d will only require the plant to cooldown to 350°F if Section 3.1.A.1.c.(2) cannot be complied with, since the equipment is only required to be operable above 350°F per Section 3.1.A.1.c.(1) (and Standard Technical Specification 3.4.4). This change will not involve a significant increase in the probability or consequences of an accident previously evaluated, because the PORVs are only required for high pressure protection above 350°. It should be noted that the Standard Technical Specifications require the unit to be placed in cold shutdown in this case, but we believe this is an oversight in the the Standard Technical specifications.

The other proposed changes are either administrative in nature or are more restrictive, and therefore will not effect the probability or consequences of previously analyzed accidents.

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

The proposed changes, for the reasons described above, create no new or different accident type. No safety analyses are affected. No new or different accident type is created. The accident analyses presented in the Updated Safety Analysis Report remain bounding.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes, for the reasons described above, do not involve a significant reduction in the margin of safety.

Proposed changes a, c and e are purely administrative change intended to clarify and simplify the Technical Specification requirements.

Proposed change b constitutes a more restrictive limitation than presently exists in the specification by reducing the allowed time to reach Hot Shutdown. The elimination of the requirements for the pressurizer spray are consistent with guidance provided in the Standard Technical Specifications.

Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 3.1.A.4

Proposed Changes

New Section 3.1.A.4 is the old Section 3.1.A.5.

General Changes II and V were made to this section.

Two other changes were made to this section. The paragraph that existed below Specification 3.1.A.5.b.4 has been placed above the four conditions (new Section 3.1.A.4.b.(1) thru (4)). The four conditions have been modified by deleting "are" and adding "or" at the end of the first three conditions.

Reasons for Change

With these changes, this section will conform to the other format changes being made to the Technical Specifications.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes are administrative in nature and therefore will not effect the probability or consequences of previously analyzed accidents.

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

The proposed changes are administrative in nature. No safety analyses are affected. No new or different accident type is created. The accident analyses presented in the Updated Safety Analysis Report remain bounding.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes involve only administrative changes to the Technical Specifications. No safety margins are affected.

This change is an administrative change. Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 3.1.B

Proposed Changes

General Changes I and V apply to this section.

Old Sections 3.1.B.1.a and b, 3.1.B.2 and 3.1.B.3 were moved to the Bases Section for consistency with the STS. Specific heatup and cooldown limits were added to Section 3.1.B.1. New Section 3.1.B.4 was added to provide actions to be followed in the event the limits of Section 3.1.B.1 or 3.1.B.2 are exceeded.

The temperature restrictions on reactor criticality have been moved to this section from Section 3.1.F.2.

Reasons for Change

This change will provide better definition of the limits and adds the required actions if the limits are not met.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes include administrative changes (3.1.B.1, 2 and 3) and changes which add action statements (3.1.B.4) consistent with the Standard Technical Specifications and therefore will not significantly affect the probability or consequences of previously analyzed accidents.

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

The proposed changes only include administrative changes and changes that specify additional action statements. Therefore, no safety analyses are affected; no new or different accident type is created; and the accident analyses presented in the Updated Safety Analysis Report remain bounding.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes do not involve a significant reduction in the margin of safety, because the changes are consistent with to the guidance provided in the Standard Technical Specifications.

These changes consist of administrative changes and also additional restrictions not presently included in the Prairie Island Technical Specifications. Therefore, based on these considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 3.1.C

Proposed Changes

General Changes I and V were made to this section.

- a. Section 3.1.C has been reorganized into three sections: leakage detection, leakage, and pressure isolation valve leakage.
- b. The statement "Detected or suspected leakage from the reactor coolant system shall be investigated and evaluated." was deleted for new Section 3.1.C.1 in conformance with the STS.
- c. A statement was added to Section 3.1.C.1 to require the plant to shutdown if less than two means of leakage detection are available.
- d. New Section 3.1.C.2 is a combination of old Sections 3.1.C.2 through 6. Format changes have been made and shutdown times have been added.
- e. New Section 3.1.C.3 is old Section 3.1.H. This section was rewritten deleting the option to isolate leaking check valves. An erroneous reference to Section 4.3.A was corrected to refer to Section 4.3.

Reasons for Change

- a. The reorganization was done to better differentiate the specifications on leakage and leakage detection.
- b. The referenced statement, while certainly a good practice, does not belong in the Technical Specifications.

- c. The action statement is being added since none previously existed.
- d. These changes add required action times.
- e. Since this section deals with primary coolant leakage, it has been included with this section (which is consistent with the STS). The option to isolate leaking check valves has been deleted since the isolation required would not have been possible at Prairie Island.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes include administrative changes (Items a, b and e) and changes which add action statements (Items c and d) consistent with the Standard Technical Specifications and therefore will not significantly affect the probability or consequences of previously analyzed accidents.

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

The proposed changes only include administrative changes and changes that specify the action to be taken when outside the bounds of the Limiting Conditions for Operation. Therefore, no safety analyses are affected; no new or different accident type is created; and the accident analyses presented in the Updated Safety Analysis Report remain bounding.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes do not involve a significant reduction in the margin of safety, because the changes are consistent with to the guidance provided in the Standard Technical Specifications.

The deletion of the referenced sentence, as described in Item b, does not affect plant safety since leakage from the reactor coolant system will continue to be investigated and evaluated. The proposed specifications require at least two means of leak detection, which is consistent with the existing specifications. The addition of the action statement described in Item c constitutes an additional limitation not presently included in the Technical Specifications.

The proposed required action times discussed in Item d are consistent with Standard Technical Specifications and constitute additional limitations not presently included in the Technical Specifications.

Item e deletes an option which doesn't apply to Prairie Island. The rest of this change is purely administrative.

Therefore, based on these considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 3.1.D

Proposed Changes

General Change V has been made to this section.

- a. Old Section 3.1.D.2 has been removed and the two definitions added to Section 1.0. Old Section 3.1.D.3 became Section 3.1.D.2.
- b. The first line of new Section 3.1.D.2 was changed to clarify the statement "above hot shutdown" by deleting that statement and adding the word "critical." Old Section 3.1.D.3.(a) has been deleted and old Sections 3.1.D.3.(b) and (c) have been renumbered. Section 3.1.D.2.(a) and (b) reflect changes to allow one hour to initiate action and 6 hours to place the plant in hot shutdown.
- c. New Section 3.1.D.3 is old Section 3.1.D.4.(a). The reporting requirements from old Section 3.1.D.4.(a) have been deleted. (Section 6.7 is also affected by this change.)

Reason for Change

- a. The definitions have been moved to the Section 1.0 to emphasize the Limiting Conditions for Operation.
- b. "Above hot shutdown" implies above 547^oF in the Prairie Island Technical Specifications. Since above 500^oF is more restrictive the reference to "above hot shutdown" is unnecessary. "Critical" has been added to provide a reactivity requirement to the specification. The allowable times to take action and place the unit in hot shutdown are consistent with the format in other sections of the Technical Specifications.
- c. This change was recommended by Generic Letter 85-19 dated September 27, 1985.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes include administrative changes, changes which conform to NRC guidance provided in Generic Letter 85-19 and changes to action statements. These changes will not significantly affect the probability or consequences of previously analyzed accidents.

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

These changes only involve changes to the specifications associated with coolant activity and as such no new or different accident type is created.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes do not involve a significant reduction in the margin of safety, due to minor nature of these change.

Item a is an administrative change.

The changes discussed in Item b will make this specification consistent with other specifications. The addition of allowable times to reach hot shutdown and to take action are consistent with the Standard Technical Specifications in general although not consistent with Standard Technical Specification 3.4.8, Specific Activity. There is no reason that this specification should have different allowable times. Using the same allowable times will be more consistent for the operator from a human factors standpoint.

Item C substitutes an annual report for a thirty day report and adds a requirement for annual reporting of occurrences when the specific activity specification is exceeded. The change removes the requirement to shut down if the 1.0 microcurie per gram Dose Equivalent I-131 limit for a cumulative time of 500 hours in any 6 month requirement is exceeded. Generic Letter 85-19 stated that this requirement was no longer "necessary on the basis that proper fuel management by licensees and existing reporting requirements should preclude ever approaching the limit." We concur with this evaluation and believe the proposed change is clearly within the bounds of Commission guidance.

Therefore, based on these considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 3.1.E

Proposed Changes

General Changes I (Specification 3.1.E.3) and V.

Delete the word "Specification" from the heading and add a period to the references to specification 3.1.E.1 changing "3.1 E.1" to "3.1.E.1." The "cold shutdown condition" has been changed to "COLD SHUTDOWN" in paragraph 3.1.E.4.

Reason for Change

These changes are consistent with the new format.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes are administrative in nature and therefore will not effect the probability or consequences of previously analyzed accidents.

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

The proposed changes are administrative in nature. No safety analyses are affected. No new or different accident type is created. The accident analyses presented in the Updated Safety Analysis Report remain bounding.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes involve only administrative changes to the Technical Specifications. No safety margins are affected.

This change is an administrative change. Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 3.1.F

Proposed Changes

General Change V applies to this section.

Delete the word "specification" from the heading. Delete Section 3.1.F.2.

Reason for Change

Section 3.1.F.2 contained a reference to Figure 3.1-1. This reference is now included in Section 3.1.B.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes are administrative in nature and therefore will not effect the probability or consequences of previously analyzed accidents.

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

The proposed changes are administrative in nature. No safety analyses are affected. No new or different accident type is created. The accident analyses presented in the Updated Safety Analysis Report remain bounding.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes involve only administrative changes to the Technical Specifications. No safety margins are affected.

This change is an administrative change. Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 3.2

Proposed Change

General Changes I, III, IV (Section 3.2.D.1 thru 5) and V apply to this section.

Item 4 of this exhibit discusses changes to old Section 3.2.D.4.

Item 5 of this exhibit discusses the addition of Section 3.2.E.

- a. Section 3.2.A has been changed to only apply below 200°F. An action statement has been added to this section similar to the applicable STS requirement.
- b. Delete the following words from Section 3.2.B.2:

. . . and at least one pump will be lined up to supply boric acid to the operable reactor.

Delete "At least" and "(associated with the boric acid transfer pump in 2. above)."

- c. Add the words "required to meet the requirements of specification 3.2.B.4" to Sections 3.2.B.2 and 3.2.B.5.

Add the words "required to meet the requirements of specification 3.2.C.4" to Sections 3.2.C.2 and 3.2.C.5.

- d. Change the colon in Section 3.2.C.4 to a hyphen and delete the comma.
- e. Add Specification 3.2.D.6.

Reason For Change

- a. Specification 3.2.A is less restrictive than 3.2.B and C and applies only when the plant is below 200°F. The specification has been changed to make this clear. An action statement has also been added since none previously existed.
- b. This will be consistent with paragraphs 3.2.C.2 and 3.2.D.2. Periodically the boric acid pumps need to be isolated from the operable reactor in order to change the boric acid filter as well as for other reasons. Section 3.2.B.2 requires one pump to be lined up to the reactor at all times during single unit operation. However, section 3.2.C.2 does not have this requirement for two unit operation. This change will make the two sections consistent and allow for necessary periodic maintenance to be performed. Section 3.2.B.3 changes were made to simplify and clarify the wording.
- c. The addition of the words "required to meet the requirements of Specification 3.2.B.4" or " . . . 3.2.C.4" will clarify these sections. The wording of the old specification which required flow paths from the boric acid tanks to be heat traced was confusing. This change will clarify that only the heat tracing necessary for "flow paths from the boric acid tanks required to meet the requirements of Specification 3.2.B.4" or " . . . 3.2.C.4" need be operable.
- d. Editorial corrections.
- e. Previously, no out of service time allowance was provided for the Boric Acid Tanks.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The addition of Section 3.2.D.6, allowing a boric acid storage tank to be inoperable for eight hours, will not significantly affect the probability of accidents previously analyzed since the purpose of the boric acid is to protect the plant during a design basis steam line break and the probability of having a design basis main steam line break is very low. Furthermore, the probability of having a design basis steam line break when none of the boric acid storage tanks are operable will not be significantly affected by allowing the plant to operate for eight hours with no operable boric acid storage tank. If these two events did occur concurrently, the consequences of the accident would be increased, but due to the extremely low probability involved and similar allowance in the Standard Technical Specifications we believe this change is acceptable.

The remainder of the changes to this subsection are administrative in nature intended to clarify the intent and requirements of this specification and therefore will not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

These changes will not create a new or different accident type since they involve either administrative or allowed inoperability times for existing equipment.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

Due to the small probabilities involved with having a design basis steam line break and having no boric acid storage tank operable, there is no significant reduction in the margin of safety.

Item a clarifies that this section only applies if reactor coolant temperature is below 200°F.

Items b, c and d further clarify the intent and requirements of this specification.

Item e adds an allowable time that the Boric Acid Tanks can be removed from service. The proposed allowed time was determined from the time used the Standard Technical Specifications and allowed times approved from other similar plants. The determination of this time is subjective and we believe the choices of eight hours will not adversely affect plant safety.

Therefore, based on these considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 3.3

Proposed Changes

General changes I, II, IV (3.3.2.a thru f, 3.3.B.2.a thru c, 3.3.C.1.b.(1) & (2), 3.3.C.2.b.(1) & (2), and 3.3.D.2.a thru c), and V apply to this section.

Item 4 of this exhibit discusses changes to: 3.3.A.2.a, b and d; 3.3.B.2.a and b; 3.3.D.2.a(1), b and c(1).

- a. Change the allowed inoperability times for the following equipment to the times specified in the Standard Technical Specification:

Safety Injection Pumps, RHR pumps, RHR heat exchangers, Containment fan cooler units, Containment Spray Pumps, Component Cooling Water Pumps, the Component Cooling Water Heat Exchangers and valves associated with the Safety Injection System.
- b. The word "open" was added to Section 3.3.A.1.h.(2) similar to other sections requiring breakers to be locked.
- c. Section 3.3.A.3 is a combination of old Sections 3.1.G.4 and 5.
- d. The following changes were made to the Section 3.3.B.2 Action statements to clarify containment spray pump and containment fan cooler operability requirements:

Section 3.3.B.2.a: Delete "and the remaining three fan cooler units."

Section 3.3.B.2.b: Delete "The remaining containment spray pump and." Require only two containment fan coolers, instead of four, to be operable when a containment spray pump is inoperable.

Section 3.3.B.2.c New action statement allowing two containment fan cooler units to be inoperable as long as one containment spray pump is operable.

Section 3.3.B.2.d New action statement allowing two containment spray pumps to be inoperable provided four containment fan coolers are operable.

The term "fan cooler" was replaced with "containment fan cooler."

- e. Delete old Section 3.3.B.2.c.
- f. New Section 3.3.B.2.e (old Section 3.3.B.2.d) has been modified, as shown in Exhibit B, to allow the spray additive tank to contain less than the required volume of sodium hydroxide for a period of 72 hours.

- g. Delete the word "either" and replace with "each" in Section 3.3.C.2.b.(2).
- h. The discussion of paths from the grid to the 4 kV buses in paragraph 3.3.D.2.a.(3) has been changed to use the same terminology used in Section 3.7.

Reason For Change

- a. The times specified in the existing specifications are significantly shorter than those allowed by the Standard Technical Specifications and may not in all cases allow sufficient time to complete required maintenance.
- b. This change specifies the position in which the valve should be locked.
- c. These sections were moved to this section since they deal with operation of the safety injection pumps.
- d. Changes were made to the Section 3.3.B.2 action statements to clarify containment spray pump and containment fan cooler operability requirements by removing redundant wording. Changes to Section 3.3.B.2.b and the addition of Sections 3.3.B.2.c and d will allow additional operating flexibility.
- e. Old Section 3.3.B.2.a allows the plant to operate with a containment fan cooler inoperable for 48 hours. Old Section 3.3.B.2.c allows the plant to operate for 24 hours with a containment fan cooler damper or containment spray valve inoperable. Since a containment fan cooler would be considered inoperable if a damper were inoperable or a spray pump would be inoperable if a valve were inoperable, 3.3.B.2.c is redundant and unnecessary.
- f. Technical Specification 3.3.B.1.c requires that the spray additive tank contain not less than 2950 gallons of solution with a sodium hydroxide concentration of 9% to 11% by weight inclusive. The existing Section 3.3.B.2.d allows the sodium hydroxide concentration to be out of specification for a period of 72 hours, but does not provide for the tank level (number of gallons) being out of specification. This results in a Technical Specification violation any time the tank level falls below the required level, for even a moment. A number of Technical Specification violations and Licensee Event Reports have resulted from this wording error.

Section 3.3.B.2.e has been modified to allow the spray additive tank to be "inoperable" for a period of 72 hours. This will allow either the concentration or tank level (number of gallons) to be out of specification for a period of 72 hours and will eliminate the unnecessary Technical Specifications violations that have occurred in the past.

- g. The existing wording could be interpreted to only allow one heat exchanger out of service for both units. Since the heat exchangers cannot be cross-connected, the removal of one component cooling heat exchanger on one unit will have no adverse effect on the other unit. The proposed wording, changing "either" to "each", will clearly allow one heat exchanger on each unit to be out of service.
- h. Use of the same terminology will clarify the specifications.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

Proposed changes a, d and f involve the addition of new action statements and changes to existing action statements which are less restrictive than the existing specifications, but for the reasons discussed below do not significantly affect the probability or consequences of previously analyzed accidents.

The remaining changes are administrative in nature and do not affect the probability or consequences of previously analyzed accidents.

- 2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

Since the proposed changes only involve action statements and other administrative changes, no new or different accident type is created.

- 3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes do not involve a significant reduction in the margin of safety for the reasons stated below.

Items a and d:

These proposed times and inoperability conditions have been found acceptable for use in the Standard Technical Specifications.

The additional inoperability conditions requested for the containment cooling systems are consistent with the capabilities of the Prairie Island systems as discussed in USAR Section 6.3.2.

This change may result in some increase to the probability or consequences of previously analyzed accidents. However, it does

conform to the guidance provided in the Standard Technical Specifications (STS).

Items b, c and h are administrative changes.

Item e:

Deletion of Section 3.3.B.2.c will have no affect on the health and safety of the public since it does not change the plant requirements. This change is intended to clarify existing Technical Specification requirements.

Item f:

The Standard Technical Specification equivalent to Prairie Island Technical Specifications 3.3.B.1.c and 3.3.B.2.d (Section 3.6.2.2, Spray Additive System), allows the spray additive system to be inoperable for a period of 72 hours. This would include inoperability due to the concentration or tank level being out of specification. The requirements of the existing section 3.3.B.2.d are overly conservative and do not provide adequate operational flexibility to avoid Technical Specification violations. The proposed Section 3.3.B.2.d conforms with the STS requirements and should provide the additional operational flexibility necessary to avoid unnecessary Technical Specification violations, while providing adequate assurance that the spray additive tank will be available when required. While this change may result in some increase in the consequences of a previously-analyzed accident, the results are clearly within the bounds of previous Commission guidance in that it conforms to the corresponding Standard Technical Specification.

Item g clarifies this specification and will not cause a change in the consequences of previously analyzed accidents.

Therefore, based on these considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 3.4

Proposed Changes

General Change I, II, III, IV (3.4.C.1.a & b) and V apply to this section.

Item 4 of this exhibit discusses changes to section 3.4.C.1.b.

- a. This section has been reorganized from two subsections to four. One section was provided for each type of equipment with the associated action statements included in each subsection.
- b. Delete Specification 3.4.A.2.f.
- c. The present specification requires the plant to be placed in cold shutdown if the requirements of Section 3.4.A.3 are not met. The proposed action statement only requires the plant to close

those dampers associated with the inoperable equipment. An action statement for two dampers or two trains of the steam exclusion system being inoperable has been added.

Reason for Changes

- a. This change makes it easier to tailor the action statements to the specifications.
- b. Specification 3.4.A.2.f is unnecessary since this equipment is required to be operable by the definition of operability.
- c. The inoperability of this equipment does not necessitate a plant shutdown since the equipment can be placed in the safeguards condition by closing the associated dampers.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The change described in Item c will not affect the probability or consequences of accidents since the specification will require the equipment to be placed in its safeguards position (closed) when inoperable. The rest of the proposed changes are administrative in nature and therefore will not effect the probability or consequences of previously analyzed accidents.

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

The change described in Item c will not create the possibility of a new or different kind of accident since the specification will require the equipment to be placed in its safeguards position (closed) when inoperable. The rest of the proposed changes are administrative in nature and therefore will not create the possibility of a new or different kind of accident from any accident previously analyzed.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The change described in Item c will not reduce the margin of safety since the specification will require the equipment to be placed in its safeguards position (closed) when inoperable. The rest of the proposed changes are administrative in nature and therefore will not reduce the margin of safety.

The removal of the potential shutdown in change c will improve the safety of the plant by removing the potential of an unnecessary shutdown caused by this equipment.

Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 3.5

General Change V was made to this section.

Section 3.6

Proposed Changes

General Changes I, II and V apply to this section.

Item 4 of this exhibit discusses changes to old Sections 3.6.A.5 and E.5.

- a. Delete Section 3.6.A.3 and 4.
- b. Separate Section 3.6.A into seven subsections. Section 3.6.A, Containment System Integrity, has been subdivided to be consistent with changes made to the definition of Containment Integrity and its division into Containment Integrity, Shield Building Integrity and Auxiliary Building Special Vent Zone Integrity.

<u>Old Section</u>	<u>New Section</u>
3.6.A.1	3.6.A
3.6.A.5	3.6.B
3.6.A.6	3.6.C
3.6.A.7	3.6.D
3.6.A.8	3.6.E.1 and 2
3.6.A.9	3.6.E.3
3.6.A.10	3.6.F

- c. Add Section 3.6.E.1. Old Section 3.6.A.8 was incorporated into new Section 3.6.E.2. This Section has been titled "Auxiliary Building Special Vent Zone Integrity (an added definition to Section 1.0). References to maintenance, construction and testing activities have been deleted. The word "intermittently" has been deleted.
- d. Old Section 3.6.A.9 (now Section 3.6.E.3) has been included in the Auxiliary Building Special Ventilation Zone Integrity section. Minor wording changes have been made.
- e. Old Section 3.6.A.10 and the Auxiliary Building Special Ventilation System part of old Section 3.6.E have been combined into Section 3.6.F, titled "Auxiliary Building Special Ventilation System." Old Sections 3.6.E.2.a and b have been moved to new Section 4.4.B.4.a.(1) and (2). The diesel generator

operability statement (old Section 3.6.E.1) has been deleted since this condition is covered by the definition of "operable."

- f. Add Section 3.6.G.
- g. The part of old Section 3.6.F dealing with the Shield Building Ventilation System is now contained in 3.6.H. Add Section 3.6.H.3.

Reason For Change

- a. Section 3.6.A.3 and 4 are confusing and not consistent with the Standard Technical Specifications. The removal of Section 3.6.A.3 and 4 will simplify the Technical Specifications.
- b. The definition of Containment Integrity has been divided into three new definitions: Containment Integrity, Shield Building Integrity and Auxiliary Building Special Ventilation Zone Integrity in order to clarify the existing Section 3.6 integrity requirements. Three definitions will make it easier to specify individual action statements for each of the three areas. The subdivision of 3.6.A will allow individual section to found more quickly.
- c. The proposed section has been modified to remove the word "intermittently" and to eliminate reference to maintenance, construction and testing activities. These changes will remove the need to interpret the meaning of the word "intermittently" and will remove unnecessary wording from the specification.
- d. Old Section 3.6.A.9 has been incorporated into Section 3.6.E.3
- e. & g. The requirements for the shield building and auxiliary building special ventilation systems, old Sections 3.6.A.10 and 3.6.E, have been incorporated into new Sections 3.6.F and H in order to clarify the existing requirements for these ventilation systems. In old Section 3.6.E.1 operability of these ventilation systems discussed diesel generator operability. This has been deleted since it is unnecessary with the new definition of operable which was added to the Technical specification in last few years. Section 3.6.H.3 was added since no action statement existed. Twenty-four hours was used for the inoperability time for two trains, since Shield Building Integrity is allowed to be inoperable for that period of time in the STS.

Old Section 3.6.E.2 has been moved to new Section 4.4.B.4.a.(1) and (2) since it is a surveillance requirement.

- f. The new Shield Building Integrity specification was written following guidance provided in the Standard Technical Specifications (STS).

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration

as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

Items f and g involve new action statements based on guidance provided in the Standard Technical Specifications. These changes could affect the consequences of accidents, but considering the low probability of a accident occurring when the shield building integrity or associated ventilation is not available, the increased risk to the public is not significant. The rest of the changes are administrative in nature and therefore will not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed amendment only involves specification changes related to systems required to mitigate accidents and therefore do not create the possibility of a new or different kind of accident from any accident previously analyzed.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes do not involve a significant reduction in the margin of safety, because the proposed action statements conform to the guidance provided in the Standard Technical Specifications.

Item a:

The deletion of Section 3.6.A.3 and 4 have been compensated for by the additional restriction placed on the definition of refueling. Essentially these specifications prevented the plant from adding positive reactivity by rod motion and boron dilution unless 1) containment integrity requirements were met or 2) the plant was shutdown by 5 or 10% reactivity. The real concern with making positive reactivity changes when you don't have containment integrity, exists when the vessel is open to the containment atmosphere. This is demonstrated by the Standard Technical Specification requirement that anytime the head bolts are less than fully tensioned, the reactor be shutdown by 5% reactivity. The STS contains no requirements on positive reactivity additions like the Prairie Island specifications 3.6.A.3 and 4. This change will allow positive reactivity changes to be made between 140° and 200° without containment integrity or 5% shutdown margin. This is consistent with the Standard Technical Specifications.

The moving of Section 3.6.E.2 to Section 4.0 is an administrative change.

Item b:

The definition of Containment Integrity has been divided into three definitions and therefore is an administrative change.

Item c:

The proposed changes will not affect the way auxiliary building special ventilation zone boundary openings are used or how they are administratively controlled.

Item d is an administrative change.

Items e. & g:

This change makes administrative changes and adds an action statement. The additional action statement conforms with guidance provided in the Standard Technical Specifications.

Item f:

The proposed action statement for the Shield Building allows the plant to operate for 24 hours without Shield Building integrity. Previously no allowed inoperability time was provided. The 24 hours is the time specified in the Standard Technical Specifications. This is justified for the Prairie Island plant since the probability of having a LOCA during the allowed inoperable time of 24 hours is very low. If a LOCA did occur during this 24 hour period, the releases from the plant would not have the benefit of the filtering provided by the Shield Building Ventilation system (in the worst case). The assumed filtering efficiency is 95%. Loss of filtering would increase the iodine releases by a factor of 20. Since our current projected releases are approximately 1% of 10 CFR Part 100 limits (See USAR Section 14.9.8), the projected offsite doses without Shield Building Integrity would still be well within the limits.

Therefore, based on these considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 3.7

Proposed Changes

General Changes I (Sections 3.7.A and B), II (Section 3.7.A), IV (Sections 3.7.B.1, 4, 6, 7 & 8) and V apply to this section.

- a. In Sections 3.7.A.1 the term "4kV safety buses" was changed to "4 kV safeguards buses". In new Sections 3.7.B.1, 4, 6, and 7 (old Sections 3.7.B.1 thru 3) the term "4kV bus" was changed to "4 kV safeguards buses". In new Section 3.7.B.6 (old Section 3.7.B.3) the term "4kV, 480V bus" was changed to "4 kV safeguards bus, 480 V safeguards bus".

In Section 3.7.A.1 replace "consisting of transmission lines, associated switchgear, and transformers that are fully

operational and energized" with "shall be operable." In Section 3.7.A.2 replace "and their safeguards motor control centers are both" with "shall be." Replace "4160 volt" with "4 kV."

In Section 3.7.A.3 replace "volt" and "are both" with "V" and "shall be."

In Section 3.7.A.4 replace "are" with "shall be."

In Section 3.7.A.5, the diesel generators are referenced by their equipment identifier numbers: D1 and D2 (this is also done in new Sections 3.7.B.1, B.2 and B.5). Replace "cooling water pump" with "diesel driven cooling water pump."

In Section 3.7.A.6, replace "are" with "shall be."

- b. The old Section 3.7.A.7 has been divided into two sections (3.7.A.7 and 8); one dealing with Unit 1 and the other dealing with Unit 2. Both sections have been modified to allow one of the instrument panels to be powered from Panel 117 (or 217 for Unit 2) or its associated instrument inverter bypass source. Change "inverter supply buses" to "Instrument AC Panels."
- c. In new Section 3.7.B.1 (old Section 3.7.B.1), reference to the diesel driven cooling water pumps and the requirement for demonstrating their operability has been deleted. "Engineered safety features" was changed to "engineered safety features equipment." These changes were also made to new Section 3.7.B.4 (old Section 3.7.B.2).
- d. Section 3.7.B.2 is a new action statement that specifies the actions to be taken when two paths from the grid to the plant 4kV buses are inoperable.
- e. Section 3.7.B.3 is a new action statement that specifies the actions to be taken when one path from the grid to the plant 4kV buses and one diesel generator are inoperable.
- f. In Section 3.7.B.4 (old Section 3.7.B.2), demonstration of the operability of the "other" diesel generator has been changed as follows:
 - 1) demonstration of operability shall be done within 24 hours rather than immediately,
 - 2) followup testing during the period of inoperability has been deleted,
 - 3) a specific reference to the surveillance section to be used to demonstrate operability has been added and
 - 4) two footnotes have been added.

The requirement for all safeguards equipment to be operable was changed to only require operability of the safeguards equipment

associated with the operable diesel generator.

Items a and c above also describe changes to new Section 3.7.B.4.

- g. Section 3.7.B.5 is a new action statement that specifies the actions to be taken if both diesel generators are inoperable.
- h. New Sections 3.7.B.6 and 3.7.B.7 replace old Section 3.7.B.3. The 480 V safeguards motor control centers have been added to new Section 3.7.B.6 and inoperability of a 4 kV safeguards bus has been expanded to include its associated 480V bus including associated safeguards motor control centers.

The battery charger requirements of old Section 3.7.B.3 has been separated from the 4 kV and 480 V bus requirements. Inoperability of the battery charger is allowed as long as the battery is operable.

The requirements for both diesel generators and both paths from the grid to be operable have been reduced to only require the operability of the diesel generator associated with the operable equipment.

- i. Old Section 3.7.B.4 is now new Section 3.7.B.8.
- j. Action statements for additional degraded conditions were added in Sections 3.7.B.9 and 10 (associated with new Sections 3.7.A.7 and 8).

Reason For Change

- a. Changes were made to clarify and provide consistent terminology. The diesel generators are referenced by their equipment identifiers to ensure that this specification is only applied to the safeguards diesel generators. The description of minimum safety related equipment was deleted to remove unnecessary wording.
 - b. This change reflects the addition of instrument inverter bypasses to the plant electrical system. The bypasses are shown in the Prairie Island USAR, Figure 8.5-1 (Figure 8.5-2 for Unit 2). Wording changes were made to clarify and provide consistent terminology.
 - c. The reference to the diesel driven cooling water pumps has been deleted since they are encompassed by the term "engineered safety features". Removal of the requirement for demonstrating the operability of the associated diesel cooling water pump from old Section 3.7.B.2 is discussed in Item 4 of this Exhibit.
- d,e & g. These action statements were added to cover three situations which were not previously addressed in the Prairie Island Technical Specifications.

- f. The demonstration of operability of the "other" diesel generator within 24 hours will give the operator more flexibility to perform the surveillance.

Deletion of the followup daily testing will reduce the number of diesel generator starts. Thereby, reducing the potential for degradation of the diesel generators.

The reference to surveillance Section 4.6.A.1.e has been added to specify which surveillance shall be performed to demonstrate diesel generator operability.

The two footnotes were added to clarify when the operability of the "other" diesel generator should be demonstrated.

The change to only require operability of the equipment associated with the "other" diesel generator was made because the equipment associated with the inoperable diesel generator would not be available during a loss of off-site power.

- h. Section 3.7.B.6 was revised to include the 480 V safeguards bus motor control centers. This will make it clear that motor control centers have the same inoperability limitations as the buses that are their supply.

The battery charger action statement has been moved to a separate paragraph to separate the requirements for this equipment from those of the 4 kV and 480 V buses. This also facilitated a change to the conditions for inoperability of the battery chargers. The proposed change allows a battery charger to be inoperable as long as the associated battery remains operable.

The reference to the operability requirements for the diesel generators and the paths from the grid were changed to remove unnecessarily restrictive requirements from the specifications.

- i. Renumbering of old Section 3.7.B.4 to Section 3.7.B.8 is an editorial change made as part of the revision process.
- j. Prior to the addition of the manual bypass for each inverter (See item b above) only one backup source (Panel 117, for Unit 1) existed to supply the four instrument buses. Following modification, each instrument bus can be supplied directly from its associated 480 V MCC. These new specifications have been added to take advantage of this additional operational flexibility.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes can be grouped into four categories: 1) administrative changes and other minor changes (a, b, c, h and i), 2) changes associated with the addition of instrument inverter bypasses (b and j), 3) changes to reduce the number of diesel generator starts (f) and 4) add new action statements (d, e and g). Based on the evaluation provided below, we have concluded that none of these changes involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Only one of these changes (Items b and j) involves a change to the plant hardware. However, this change does not constitute a new or different kind of accident since it adds a feature that is equivalent to a feature that already existed in the plant electrical system.

Based on the evaluation provided below, we have concluded that none of these changes will create the possibility of a new or different kind of accident from any accident previously analyzed.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes do not involve a significant reduction in the margin of safety based on the evaluation provided below.

Items a and i are purely administrative changes intended to clarify and provide consistent terminology in the existing Technical Specifications.

Item b allows the instrument bus to be supplied by the inverter, the manual bypass or Panel 117. The existing specifications already allow an instrument bus to be supplied by an alternate source, Panel 117 (for Unit 1). This change will provide additional flexibility in that a choice between the manual bypass and Panel 117 will be allowed. This change will not reduce the safety margin in any way.

Deletion of the reference to the diesel driven cooling water pumps in lieu of the reference to engineered safety features in Item c is a purely administrative change intended to simplify and provide consistent terminology. Removal of the requirement for demonstrating the operability of the associated diesel cooling water pump from old Section 3.7.B.2 is discussed in Item 4 of this Exhibit.

The new specifications described in items d, e and g have been added to define the actions required for three situations not previously addressed in the specifications. These changes add additional restrictions not presently in the Technical Specifications. The changes are consistent with the Standard Technical Specifications

recommended in Generic Letter 84-15 with the following exceptions:

Section 3.7.B.3 (item e) includes additional conditions on when the operability of the "other" diesel generator should be demonstrated. This conforms to recent NRC guidance provided in the North Anna License Amendment Safety Evaluation Report dated April 25, 1985.

Sections 3.7.B.3 and 5 (item e and g) do not include surveillance requirements on the paths from the grid to the 4 kV safeguards buses. This is consistent with the existing format of the specifications. This does not constitute a reduction in the safety margin since the operability of the paths is clearly evident to the control room operator.

New Section 3.7.B.4 (old Section 3.7.B.2) is not consistent with the Standard Technical Specifications, however, the proposed changes to Section 3.7.B.4 (item f) are consistent with the Standard Technical Specifications recommended in Generic Letter 84-15 with the following exception. Section 3.7.B.4 (item f) includes additional conditions on when the operability of the "other" diesel generator should be demonstrated. This conforms to recent NRC guidance provided in the North Anna License Amendment Safety Evaluation Report dated April 25, 1985.

Item f also removes requirements from the specifications that would require the safeguards equipment associated with the inoperable diesel generator to be operable. This requirement is not consistent with the Standard Technical Specifications and has limited operational flexibility in the past. Removal of this requirement will not adversely affect plant safety since safeguards equipment associated with an inoperable diesel generator would be of little value during a loss of offsite power event.

The changes in item h clarify the operability requirements for the 4 kV and 480 V safeguards buses, associated motor control centers and the battery chargers. Since a 4 kV safeguards bus or 480 V safeguards bus can be inoperable for 8 hours, it is clear that 480 V safeguards buses or motor control centers associated with the inoperable 4 kV or 480 V buses can also be inoperable for that period of time. The change to the inoperability time for the battery charger is consistent with guidance provided in the Standard Technical Specifications. The reference operability of "both paths from the grid" is unnecessary since specification 3.7.B.1 and 2 require all other safeguards equipment to be operable in the event of inoperability of one or both paths from the grid. The change from requiring the operability of both diesel generators to only requiring the operability of the diesel generator associated with the operable bus will not adversely affect plant safety since the diesel associated with the inoperable bus will be of no value. Safeguards equipment associated with an inoperable diesel generator would be of little value during a loss of offsite power event.

Item j provides limitations on the use of features of the instrument AC System that were not previously addressed. This change is consistent

with existing Specification 3.7.B.4 (new specification 3.7.B.7) which allows a battery to be inoperable for a period of 8 hours. When a battery is inoperable, the two associated Instrument AC panels would be fed from one of the three sources listed above (the inverter, the inverter bypass or Panel 117, See USAR Figure 8.5-1). In this case all three sources are ultimately powered from the same 480 V MCC bus. Therefore, the proposed change to allow two Instrument AC panels to be powered from an inverter bypass source for 8 hours is an identical condition and therefore consistent with the existing specification which allows the battery to be inoperable for 8 hours. This change will allow more flexibility in performing inverter and/or battery maintenance.

Therefore, based on these considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 3.8

Proposed Changes

General Change V was made to this section.

Item 4 of this exhibit discusses changes to Section 3.8.D.3.

Section 3.8 has been reorganized into three subsections:

- A. Core Alterations
- B. Fuel Handling and Crane Operations
- C. --45 day requirement on the small pool

Subsection A and B are divided into two parts: the limiting conditions for operation and the action statements. The applicability and objectives statements were changed to reflect these changes.

<u>New Section</u>	<u>Old Section</u>
3.8.A.1	3.8.A
1.a	A.1
1.b	A.2
1.c	A.3
1.d	A.4
B.1	B
1.a	A.2
1.b	B.1
1.c	B.2
1.d	B.3
1.e	B.4
1.f	D.1
B.2	C, D.4
2.a	D.3
C	B.5

Other changes to this section are listed below:

- a. The requirements for containment isolation during Core Alterations

in new Section 3.8.A.1.a, have been modified to allow the equivalent of one isolation valve.

- b. Radiation monitoring requirements (old Section 3.8.A.2) has been split into individual sections for Core Alterations (Section 3.8.A.1.b), and for Fuel Handling and Crane Operations (Section 3.8.B.1.a).
- c. The old Fuel Handling section has been retitled to include crane operations.
- d. The Spent Fuel Pool Ventilation system requirements have been included in the Fuel Handling and Crane Operations section. Old Section 3.8.D.2 has been moved to Section 4.15 since these are surveillance requirements.

Reason for Change

This section was reorganized so the action statements and LCO's for fuel handling and core alterations could be clearly delineated.

- a. The addition of "or equivalent" in reference to isolation valves for containment isolation will allow other equivalent means of isolation, e.g. loop seal, blank flanges, etc.
- b. The old Section 3.8.A.2 contained requirements for both refueling and fuel handling operations. This change was made to split the radiation monitoring requirements into the appropriate sections.
- c. The old fuel handling section was retitled to include crane operations. As a result of this change, crane operations will be subject to additional restrictions. During the period when the Heavy Loads review was performed, heavy loads were prohibited from being moved over spent fuel and no Technical Specifications restrictions were necessary at that time. The prohibition of movement of heavy loads over spent fuel has been removed and therefore, it is appropriate to add Technical Specification restrictions on crane operations.
- d. The LCO's and action statements for the Spent Fuel Pool Ventilation System have been added to the Fuel Handling and Crane Operations section since they are required during those operations. As a result of this change, Spent Fuel Pool Ventilation system operability will be required only when there is a possibility of damaging spent fuel in the spent fuel pools, i.e. during fuel handling operations in the spent fuel pools or crane operations with loads over the spent fuel pools (inside the Spent Fuel Pool Enclosure).

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The addition of the changes discussed in Item a will have no effect on the probability or consequences of accidents because their intent is to allow equivalent isolation of the containment.

The addition of the changes discussed in Items b and c will have no effect on the probability or consequences of accidents because they involve additional restrictions not presently in the existing specifications.

The proposed specification in Item d will not affect the probability or consequences of analyzed accidents because it requires the spent fuel pool ventilation system to be operable whenever there is the possibility of a fuel handling accident.

The remainder of the changes are administrative in nature and therefore will not affect the consequences or probability of analyzed accidents.

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

None of these items involve changes to plant systems and as such do not create the possibility of a new or different kind of accident from any accident previously analyzed.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes do not involve a significant reduction in the margin of safety for the reasons discussed below.

The reorganization of this section is administrative in nature and has no effect on plant safety.

Items b and c constitute additional restrictions not presently in the Prairie Island Technical Specifications.

Item a will allow equivalent means of providing containment isolation during refueling. The term equivalent will ensure that closure restrictions will be sufficient to restrict radioactive material release from a fuel element failure, based upon the lack of containment pressurization potential while in refueling.

Item d will require the Spent Fuel Pool Ventilation system only during times when spent fuel damage is most probable. Section 3.9.12 of the STS requires this system to be operable at all times, however, STS action statement 3.9.12.b allows the spent fuel pool ventilation system to be inoperable for an indefinite period provided fuel handling operations are stopped. Therefore, based on the STS action statement, it would seem that the system is only required to be operable during

fuel handling and crane operations.

The changes described in a and d may result in some increase to the probability or consequences of previously analyzed accidents. However, they do conform to the guidance provided in the Standard Technical Specifications (Bases 3/4.9.4 for item a and Section 3.9.12.L for item d).

Therefore, based on these considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 3.9

Proposed Changes

General Change V was made to this section.

Sections 3.9.D, E and F were renumbered.

Section 3.9.G was added.

Reason for Change

The renumbering of Sections 3.9.D, E and F is consistent with the format used throughout the specifications.

Potential violations of this section should not require the plant to be shutdown.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes are administrative in nature and therefore will not effect the probability or consequences of previously analyzed accidents.

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

The proposed changes are administrative in nature. No safety analyses are affected. No new or different accident type is created. The accident analyses presented in the Updated Safety Analysis Report remain bounding.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes involve only administrative changes to the Technical Specifications. No safety margins are affected.

This change is an administrative change. Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 3.10

Proposed Changes

General Change IV (3.10.C.4 and 3.10.F.3) and V were made to this section.

Section 3.10 has been changed to refer to "rated thermal power" and "thermal power" rather than "rated power," "power" and "rating."

In Section 3.10.E.1, "15 inches" has been changed to "24 steps."

Reason for Changes

These changes will standardize the terminology used.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes are administrative in nature and therefore will not effect the probability or consequences of previously analyzed accidents.

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

The proposed changes are administrative in nature. No safety analyses are affected. No new or different accident type is created. The accident analyses presented in the Updated Safety Analysis Report remain bounding.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes involve only administrative changes to the Technical Specifications. No safety margins are affected.

This change is an administrative change. Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 3.11

Proposed Changes

General Change IV (3.11.C) and V were made to this section.

Section 3.11.C has been changed to be consistent with Section 3.10.C.4 by adding "or 2 movable detectors" following "thermocouples".

Section 3.11.D was added.

Reason for Change

This change makes this section consistent with 3.10.

Potential violations of this section should not require the plant to be shutdown.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes are administrative in nature and therefore will not effect the probability or consequences of previously analyzed accidents.

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

The proposed changes are administrative in nature. No safety analyses are affected. No new or different accident type is created. The accident analyses presented in the Updated Safety Analysis Report remain bounding.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes involve only administrative changes to the Technical Specifications. No safety margins are affected.

The addition of 3.11.D conforms to guidance provided by the Standard Technical Specifications (3.3.3.2) and has no effect on analyzed accidents.

This change is an administrative change. Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 3.12

General Change V was made to this section.

Section 3.13

Proposed Changes

General Changes I, IV and V apply to this section.

Item 4 of this exhibit discusses changes to old Section 3.13.C.

This section has been reorganized into two subsections: Control Room Special Ventilation System and Chlorine Detection System.

Old Sections 3.13.A, C and D have been combined and rewritten as 3.13.A, Control Room Special Ventilation System. The system is required to be operable at all times rather than only when containment integrity is required. Changes have been made to reflect the new term "core alterations." The action statement was changed to require both units to be shutdown instead of the affected unit.

Old Section 3.13.B has been moved to proposed Section 4.14.B.1 since it is a surveillance requirement.

Old Section 3.13.E is new Section 3.13.B.

Reason for Change

This section has been reorganized to be consistent with the format of the specifications.

The requirement that the Control Room Special Ventilation System be operable only when containment integrity has been deleted since it should be operable at all times. This is consistent with the Standard Technical Specifications. The action statement in Section 3.13.A requires both units to be shutdown since the Control Room Air Treatment System is common to both units.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes are administrative in nature and therefore will not effect the probability or consequences of previously analyzed accidents.

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

The proposed changes are administrative in nature. No safety analyses are affected. No new or different accident type is created. The accident analyses presented in the Updated Safety Analysis Report remain bounding.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes involve only administrative changes to the Technical Specifications. No safety margins are affected.

This change is an administrative change. Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 3.14

Proposed Changes

General Change V applies to this section.

Item 4 of this exhibit discusses changes to Section 3.14.B.2.

Add an option to establish an hourly fire watch if fire detectors are operable on at least one side of the inoperable barrier. Section 3.14.G.1 and Bases Section 3.14 have been changed to reflect this change. Change the reporting time from 14 days to 7 days.

Delete Section 3.14.B.3.c.

Add Section 3.14.H.

Reason For Change

The addition of the hourly fire watch will add flexibility to the plant operations by allowing one operator to monitor more than one inoperable fire barrier.

The deletion of Section 3.14.B.3.c is consistent with the Standard Technical Specifications.

The addition of Specification 3.14.H will prevent violations of this section from causing a plant shutdown.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The allowing of a continuous fire watch on one side of an inoperable barrier or an operable detection system on one side of an inoperable fire barrier and an hourly fire patrol provides equivalent levels of protection and therefore does not impact the probability or consequences of accidents previously evaluated.

If the Fire Suppression System is inoperable for conditions other than those defined in 3.14.B.2, a continuous fire watch will be established (as required by Section 3.14.C.2). This will provide equivalent levels of protection and therefore deletion of Section 3.14.B.3.c does not impact the probability or consequences of accidents previously evaluated.

The addition of Section 3.14.H is consistent with the Standard Technical Specifications and will not significantly affect the the probability or consequences of accidents previously evaluated.

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

These changes do not affect plant design or equipment and therefore do not create a new or different type of accident.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

For the reasons discussed above, these changes will not significantly affect the margin of safety.

The proposed change provides equivalent fire protection in the area since an hourly fire watch in conjunction with an operable detection system is comparable to a continuous fire watch. The Standard Technical Specification (STS) Section 3/4.7.12 allows both of these options. The reporting time has been changed to be consistent with the STS.

The addition of Specification 3.14.H is consistent with guidance provided by the Standard Technical Specifications (3.7.11).

Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 3.15

Proposed Changes

General Change IV applied to this section.

Section 3.15.B.3 has been modified as shown in Exhibit B, to clarify the actions required in the event the number of operable event monitoring instrumentation channels is less than the Minimum Channels Operable requirement of Table TS.3.15-2.

Add Section 3.15.B.4.

Reason For Change

The present wording of Section 3.15.B.3 references the action specified in Section 3.15.B.2 and leaves open the possibility of more than one interpretation of the action required. The proposed change to Section 3.15.B.3 removes the reference to Section 3.15.B.2 and in turn provides explicit actions to be taken in the event the number of channels falls below the minimum channels operable requirements.

The addition of 3.15.B.4 will prevent a plant shutdown upon violation of this section.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The changes to Section 3.15.B.3 are intended to clarify the section by providing explicit actions to be taken in the event the number of operable channels falls below the minimum channels operable requirements and therefore will not effect the probability or consequences of previously analyzed accidents.

The addition of Section 3.15.B.4 is consistent with the Standard Technical Specification Section 3.3.3.1.c and will not significantly affect the the probability or consequences of accidents previously evaluated.

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

These changes do not affect plant design or equipment and therefore do not create a new or different type of accident.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

For the reasons discussed above, these changes will not significantly affect the margin of safety.

Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 4.0

Proposed Changes

General Change V was made to the pages in this section that were changed. The bases were moved as discussed in Item 3 of this exhibit.

Delete the footnote in Section 4.0.

Reason For Change

The footnote is no longer applicable.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes are administrative in nature and therefore will not effect the probability or consequences of previously analyzed accidents.

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

The proposed changes are administrative in nature. No safety analyses are affected. No new or different accident type is created. The accident analyses presented in the Updated Safety Analysis Report remain bounding.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes involve only administrative changes to the Technical Specifications. No safety margins are affected.

This change is an administrative change. Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 4.4

General Change V was made to the pages in this section that were changed.

Specification 4.4.B.4.a has been changed per the discussion of changes to Section 3.6.

Section 4.5

The bases were moved as discussed in Item 3 of this exhibit.

Section 4.6

Proposed Changes

General Change V has been made to this section.

- a. Section 4.6.A.1.e and f have been combined into one subsection. The proposed changes modify the monthly surveillance requirements to permit gradual starting and loading of the diesel generators.
 - 1) The added footnote will allow the manufacturer's prelude and warmup procedures to be used during monthly testing.
 - 2) Acceptable ranges for voltage and frequency have been included in the Technical Specifications along with the diesel synchronous speed.
 - 3) The minimum test load was changed from 1375 to 1650 kw.
- b. Section 4.6.A.2 is a new section which describes a six month surveillance test which will require the diesel to be fast started (to 900 rpm within 10 seconds) and quickly loaded (to at least 1650 kw within 60 seconds). The footnote discussed above also applies to this section.
- c. New Section 4.6.A.3 (old Section 4.6.A.2) has been renumbered to facilitate the addition of the six month surveillance. The footnote discussed above also applies to this section. Old Section 4.6.A.3.b.3 has been moved to Section 4.6.A.3.E. Old Section 4.6.A.3.b.4 has been renumbered to 4.6.A.3.b.3.

Reason for Changes

The proposed changes 1) modifying the monthly surveillance requirements to permit gradual starting and loading of the diesel and 2) allowing prelubing before all planned starts will conform to the manufacturer's recommendations for reducing wear and minimizing the severity of thermal transients on the diesel generators. Fast starts without prelubing are considered abusive to the engine and can contribute to premature failures.

The requirement to load the engine to 1650 kw will conform to the manufacturer's recommendation to load the engine to at least 60% of rated load (60% of 2750 kw = 1650 kw).

The six month surveillance test is added test the engines ability to start within the 10 seconds assumed in the accident analysis. This test is very similar to the currently approved monthly surveillance test.

The proposed specifications allow prelubing for all planned starts. There is no need to demonstrate the ability of the engine to start without prelubing. Typically, one to two diesel generator starts per year occur due to actual unplanned demands. Such unplanned starts will test the ability of the diesel generator to start without prelubing.

Old Section 4.6.A.3.b.3 has been moved to Section 4.6.A.3.f since this test is performed separately from the tests required by Section 4.6.A.3.b.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

Based on the evaluation provided below, we have concluded that none of these changes involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Based on the evaluation provided below, we have concluded that none of these changes will create the possibility of a new or different kind of accident from any accident previously analyzed.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes do not involve a significant reduction in the margin of safety based on the evaluation provided below.

Reducing the test frequency and modifying the starting and loading requirements consistent with the diesel generator manufacturer's recommendations is intended to enhance the reliability of the diesel generators by minimizing the severe test conditions which can lead to premature failures. In this respect, the proposed changes will serve to enhance overall safety. The proposed changes to the testing requirements do not affect the capability of the diesel generators to

perform their intended safety function; rather, they will serve to increase the overall diesel generator reliability.

The proposed changes to the surveillance requirements, while less restrictive than the existing requirements, conform to recent NRC Staff guidance provided in Generic Letter 84-15 and North Anna License Amendment Safety Evaluation Report dated April 25, 1985.

The relocation of old Section 4.6.A.3.b.3 is an administrative change made to more accurately reflect the way the test is performed.

Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 4.7

Proposed Changes

General Change V was made to the pages in this section that were changed. The bases were moved as discussed in Item 3 of this Exhibit.

The term "Main Steam Stop Valves" has been corrected to "Main Steam Isolation Valves."

Reason for Changes

This change is consistent with terminology used in plant documentation.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes are administrative in nature and therefore will not effect the probability or consequences of previously analyzed accidents.

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

The proposed changes are administrative in nature. No safety analyses are affected. No new or different accident type is created. The accident analyses presented in the Updated Safety Analysis Report remain bounding.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes involve only administrative changes to the Technical Specifications. No safety margins are affected.

This change is an administrative change. Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 4.8

General Change V was made to the pages in this section that were changed. The bases were moved as discussed in Item 3 of this Exhibit.

Section 4.9

Proposed Changes

General Change V was made to the pages in this section that were changed. The bases were moved as discussed in Item 3 of this Exhibit.

This change requires that a 30 day report be sent to the Commission instead of a report per Section 6.7.B.1.

Reason For Change

This change was omitted by mistake from other reporting changes made in the July 11, 1984 License Amendment Request.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes are administrative in nature and therefore will not effect the probability or consequences of previously analyzed accidents.

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

The proposed changes are administrative in nature. No safety analyses are affected. No new or different accident type is created. The accident analyses presented in the Updated Safety Analysis Report remain bounding.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes involve only administrative changes to the Technical Specifications. No safety margins are affected.

This change is an administrative change. Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

Section 4.11

The bases were moved as discussed in Item 3 of this Exhibit.

Section 4.13

The bases were moved as discussed in Item 3 of this Exhibit.

Section 4.14

General Change V has been made to this section.

Specification 4.14.B.1 has been changed per the discussion of changes to Section 3.13.

Section 4.15

General Change V has been made to this section.

Specification 4.15.B.1 has been changed per the discussion of changes to Section 3.8.

Section 4.16

The bases were moved as discussed in Item 3 of this Exhibit.

Old Section 4.16.B.2 has been deleted which is discussed in Item 4.

Section 4.17

General Change V was made to the pages in this section that were changed.

The bases were moved as discussed in Item 3 of this Exhibit.

Section 4.18

General Change V was made to the pages in this section.

The bases were moved as discussed in Item 3 of this Exhibit.

Section 6.0

Proposed Changes

In Section 6.7.A, create a new Routine Report - Annual Report. Include in this report the Occupational Exposure Report and the Safety Relief Valve Failures and Challenges Report (previously 6.7.A.2 and 7). Also include Iodine reporting requirements per Generic Letter 85-19.

In Section 6.7.A.3. change "Office of Management and Program Analysis" to "Director of the Office of Resource Management."

Reason for Change

This change is a result of the recommendations in Generic Letter 85-19 dated September 27, 1985 concerning Iodine reporting.

The change in the address for the monthly report has been updated in Section 6.7.A.3.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes are administrative in nature and therefore will not effect the probability or consequences of previously analyzed accidents.

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

The proposed changes are administrative in nature. No new or different accident type is created.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes involve only administrative changes to the Technical Specifications. No safety margins are affected.

This change substitutes an annual report for a thirty day report and adds a requirement for annual reporting of occurrences of exceeding the specific activity specification. The change removes the requirement to shut down if the 1.0 microcurie per gram Dose Equivalent I-131 limit for a cumulative time of 500 hours in any 6 month requirement. Generic Letter 85-19 reported that this

requirement was no longer "necessary on the basis that proper fuel management by licensees and existing reporting requirements should preclude ever approaching the limit." We concur with this evaluation and believe the proposed change is clearly within the bounds of Commission guidance.

Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

2. Rate Trip Change for Control Rod Drop

Proposed Change

Change the Negative Rate Trip from "<15%" to "<7%" on page TS.2.2-3. Revise the associated bases on page B.2.3-3.

Expand the second paragraph of the Section 2.1 Bases to add more detail. Change the "and" to "are" in the paragraph following the equation on page B.2.1-2.

Reason For Change

This change in the negative rate trip will allow the removal of the operational restriction:

above 90% power, when rods are less than 215 steps withdrawn, the control rods must be operated in manual.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

While the proposed negative rate trip changes may result in some increase in the consequences of a previously-analyzed accident, the results are clearly within the bounds of previous Commission guidance as documented in the Safety Evaluation Report of NSP topical report NSPNAD-8102P, Revision 2. This change will have no effect on the probability of previously analyzed accidents.

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

The proposed changes are administrative in nature. No new or different accident type is created.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

The proposed changes do not involve a significant reduction in the margin of safety as documented in the Safety Evaluation Report of NSP topical report NSPNAD-8102P, Revision 2.

The Safety Evaluation Report, approving Revision 1 of NSPNAD-8102P, required the operational restriction on manual control rod control operations be maintained until new methodology was developed for the control rod drop accident. Revision 2 of NSPNAD-8102P, submitted on August 30, 1984, revised the control rod drop methodology and was

approved by the Staff on December 11, 1984. The revised methodology does not require the operational restriction if the negative rate trip was lowered to 5%, as documented in the December 11, 1984 Safety Evaluation Report. A trip point of 7% is requested to allow for instrument uncertainties. The analysis assumed a set point of 6.9% and therefore has been reanalyzed for the 7% set point (Exhibit C).

Therefore, based on these considerations, we have concluded that this change does not involve a significant hazards consideration.

3. Bases Reorganization

Proposed Changes

The Bases of Sections 2.0, 3.0 and 4.0 have been combined into three sections located behind Section 6.0. Cover sheets have been added to each section.

Where appropriate, the references in the bases of these sections have been updated to refer to the USAR rather than the FSAR. The format of the references has been standardized and some references have been deleted since they are no longer referred to in the associated sections.

The term "Basis" has been replaced with "Bases." Titles have been added to the Bases since they are no longer located directly following the associated specification.

Bases for Section 2.0

These Bases were modified to be consistent with changes discussed in Item 2 of this exhibit.

Bases for Section 3.0

As mentioned in Item 1 of this exhibit a new Bases section has been added.

Bases for Section 3.1.A

On proposed page B.3.1-1 the fourth paragraph is new to this section. It was formerly the third paragraph of the old 3.1.G Bases.

On proposed page B.3.1-2 the last two paragraphs are new to this section. The next to the last paragraph is a combination of old specification 3.1.G.2 and the first paragraph of the old 3.1.G Bases. The last paragraph is the second paragraph of the old 3.1.G Bases with minor wording changes consistent with the changes to new Section 3.1.A.3.c.(3).

On proposed page B.3.1-3 the first paragraph has been changed to include the requirement of a steam generator and a RC' to be consistent with proposed Section 3.1.A.1.c.(1). A footnote from the old 3.1.G Bases has been added as a reference.

Bases for Section 3.1.B

The second paragraph of the proposed 3.1.B Bases has been added from the Standard Technical Specifications. The third and fourth paragraphs were specifications 3.1.B.2 and 3. These have been added to the bases to conform to the Standard Technical Specifications.

The last paragraph on page B.3.1-4 was formerly the last paragraph in the bases of Section 3.1.F.

Bases for Section 3.1.C

The last paragraph of the proposed 3.1.C Bases is old Bases 3.1.H.

Bases for Section 3.1.D

Delete appropriate reporting references from the second and third paragraphs of the 3.1.D Bases. This is consistent with changes made to Limiting Condition for Operation section 3.1.D.

Bases for Section 3.1.E

No changes were made to these bases (other than those noted above).

Bases for Section 3.1.F

No changes were made to these Bases (other than those noted above).

Bases for Section 3.2

No changes were made to these Bases (other than those noted above).

Bases for Section 3.3

Two paragraphs have been added to these Bases, coming from the last two paragraphs of old Bases 3.1.G

The Bases section for the containment cooling systems has been changed to reflect the current plant configuration with respect to the use of the chilled water system (last paragraph on page B.3.3-2).

Bases for Sections 3.4

No changes were made to these Bases (other than those noted above).

Bases for Section 3.5

No changes were made to these Bases (other than those noted above).

Bases for Section 3.6

These Bases have been revised to reflect the new definition of Containment Integrity and the addition of definition for Shield Building Integrity.

Bases for Section 3.7

Bases Section 3.7 has been changed to reflect the current plant configuration and plant operation, and to be consistent with the changes described in Item 1 above. A new paragraph has been added at the bottom of new page B.3.7-1 to explain the conditions when the other diesel generator needs to be tested.

Bases for Section 3.8

No changes were made to these Bases (other than those noted above).

Bases for Section 3.9

The Bases of Section 3.9 have been changed to identify the acceptable methods of determining the waste gas Oxygen concentration. This change defines which analyzers can be used for monitoring waste gas Oxygen concentration (page B.3.9-3 next to the last paragraph).

Bases for Sections 3.10, 3.11, 3.12 and 3.13

No changes were made to these Bases (other than those noted above).

Bases for Section 3.14

The Bases were modified consistent with the Limiting Condition for Operation changes.

Bases for Section 3.15

A reference to NUREG-0737 was added to these Bases.

Bases for Section 4

The first sentence of Bases Section 4.6 was changed to reflect that the monthly diesel generator surveillance does not require rated load testing.

No other changes were made to these Bases (other than those noted above).

Reason For Change

Moving the Bases to back of the book will make the Technical Specifications easier for the operators to use since the LCO's and surveillance requirements will be less bulky.

The USAR is annually updated and therefore should be more appropriate to reference than the FSAR.

The remainder of the changes were made to make the Bases consistent with the other changes proposed in this change.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

The proposed changes only affect the Bases and therefore will not effect the probability or consequences of previously analyzed accidents.

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

Since the changes discussed are changes to the Bases, no new or different accident type is created.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

Since these changes are changes to the Bases, no safety margins are affected.

Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

4. Removal of Redundant Equipment Surveillance

Proposed Changes

Remove the requirement to test redundant equipment in the following sections:

<u>Equipment</u>	<u>PI LCO Location (old section)</u>	<u>PI Surveillance Requirement/ Location</u>	<u>STS Surveillance Requirement/ Location</u>
Boric Acid Valves	3.2.D.4	Monthly/ 4.5.B.3.c	18 months/ 4.5.2.d
Safety Injection Pump	3.3.A.2.a	monthly/ 4.5.B.1.a	Refers to Section XI
RHR pump	3.3.A.2.b	monthly/ 4.5.B.1.a	Refers to Section XI
Safety Injection Valves	3.3.A.2.d	refueling/ 4.5.B.3.f	18 months 4.5.2.e.1
Containment Fan Cooler Unit	3.3.B.2.a	monthly/ 4.5.B.2	monthly/ 4.6.2.3.a
Containment Spray Pump	3.3.B.2.b	monthly/ 4.5.B.1.(a)	Refers to Section XI
Diesel Cooling Water Pumps	3.3.D.2. a(1), b(1) & c(1) 3.7.B.2	monthly/ 4.5.B.1.b	monthly/ 4.7.4
Steam Exclusion System	3.4.C.1.b	monthly/ 4.8.C	N/A
Containment Vacuum Bkrs	3.6.A.5	quarterly/ 4.4.C	Refers to Section XI
Emer. Air Treatment Systems	3.6.E.3	monthly/ 4.4.B	monthly/ 4.6.8.1
Spent Fuel Ventilation	3.8.D.3	monthly/ 4.15.B.4	monthly/ 4.9.12.a
Control Room Ventilation	3.13.C	monthly/ 4.14.B.4	monthly/ 4.7.7.b
Fire Pumps	3.14.B.2 4.16.B.2	monthly/ 4.16.B.1.b & c	monthly/ 4.7.11.1.1.b 4.7.11.1.2.a

Reason For Change

These changes are proposed because the testing of redundant equipment, to prove operability, can have a negative effect on the equipment by increasing the number of cycles the equipment experiences.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

This change will improve the performance of equipment and is intended to reduce the potential for equipment failures due to unnecessary testing to prove operability. Periodic testing, required by Section 4 of the Technical Specifications, performs the same function. Therefore these changes will not effect the probability or consequences of previously analyzed accidents.

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

These changes only affect the testing of equipment to verify operability and therefore will not create a new or different type of accident.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

This change will improve the performance of equipment and is intended to reduce the potential for equipment failures due to unnecessary testing to prove operability. No safety margins are affected .

The Standard Technical Specifications (STS) do not require testing of the redundant equipment in similar situations (See Table above). Since the surveillance frequencies are similar to those used in the STS (See Table above), this change conforms to NRC policy.

Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

5. Double Boric Acid Accounting

Proposed Changes

Add Section 3.2.E

Reasons for Changes

This change is being submitted as a result of Prairie Island Unit No. 1 License Event Report 85-01.

This change is being made to clarify the boric acid volume requirements during plant shutdown.

Determination of Significant Hazards Considerations

The proposed change to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

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

For the reasons discussed below, this change will not effect the probability or consequences of previously analyzed accidents.

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

Once the boric acid is added to the reactor coolant system, the boric acid has fulfilled its safety function. Therefore, this change will not create a new or different kind of accident.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

No safety margins are affected, as discussed below.

USAR Section 6.2.2.2.2, "Boric Acid Tanks," (and Section 10.2.3.2.3.q) identifies two purposes for the three Boric Acid Tanks, which are common to both units:

- 1) store sufficient boric acid for refueling both units plus enough boric acid for a cold shutdown shortly after full power operation is achieved even if the most reactive RCCA is not inserted.
- 2) supply the initial source of highly concentrated boric acid solution for injection into the Reactor Coolant System following the generation of a safety injection signal.

When cooling down to cold shutdown, boric acid is added prior to beginning the cooldown. Once the 2000 gallons of boric acid are

injected, the Boric Acid Tanks have fulfilled their function. If a steam line break were to occur, the plant would not return to criticality since the boric acid is already in the reactor coolant system. It is clear from a safety standpoint that this is the optimum condition, however, the words in the current Technical Specifications require 2000 gallons of boric acid in the tanks when the plant is above 200°F even if the boric acid has already been added to the reactor coolant system. This change will eliminate this oversight in the specifications.

This change has no effect on previously analyzed accidents.

Therefore, based on the above considerations, we have concluded that this change does not involve a significant hazards consideration.

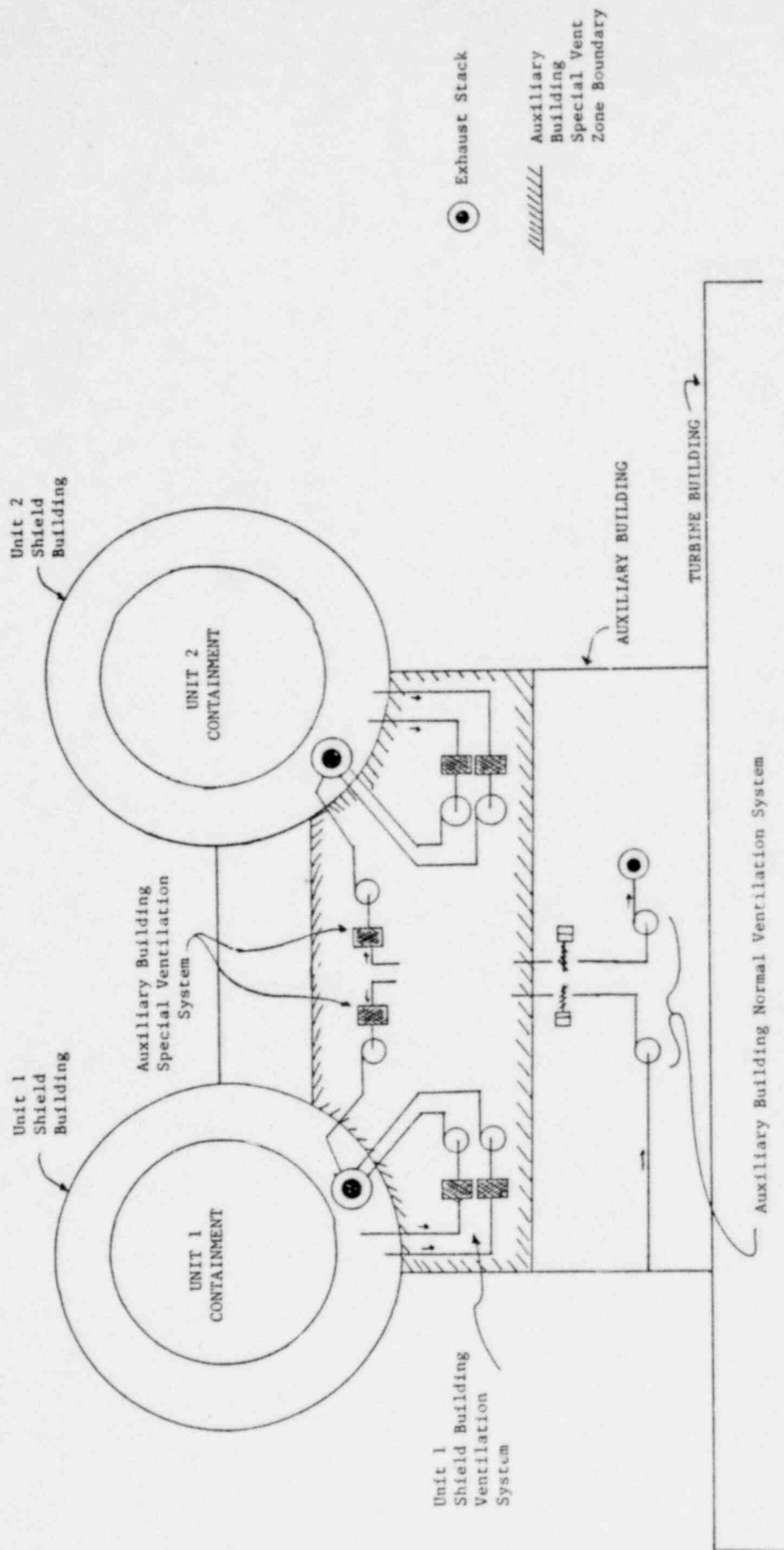


FIGURE 1 Simplified Ventilation Diagram