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The Northeast Utilities System

SEP 2 1997

Docket No. 50-336 B16595

Re: 10CFR50.90

U. S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, DC 20555

## Millstone Nuclear Power Station, Unit No. 2 Proposed Revision to Technical Specifications Compliance Issues

#### Introduction

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend Operating License DPR-65 by incorporating the attached proposed changes into the Technical Specifications of Millstone Unit No. 2. The proposed changes will correct various compliance issues identified with Technical Specifications. The proposed changes affect Technical Specification Sections Index 3/4.6.2, Definition 1.8, 4.1.1.3, 4.4.6.2, 4.5.2, 4.6.1.1, 3.6.2.1, 4.6.2.1, 3.6.2.2, 4.6.2.2, 5.5.1, B 3/4.5.2 and 3/4.5.3, B 3/4.6.1.1, B 3/4.6.2.1, and B 3/4.6.2.2.

The proposed change to Technical Specification Index 3/4.6.2 is on the same page (VII) as Index 3/4.6.5, which has been proposed to be changed in a separate letter dated April 10, 1997<sup>1</sup>. This previous submittal addressed Enclosure Building Integrity. Technical Specification Definition 1.8, Section 4.6.1.1, and B 3/4.6.1.1 were also proposed to be changed in a separate letter dated May 20, 1997<sup>2</sup>, which addressed containment isolation valves. Technical Specification Section B 3/4.5.2 and 3/4.5.3 was

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M. L. Bowling letter to the NRC, "Millstone Nuclear Power Station, Unit No. 2 Proposed Revision to Technical Specifications Enclosure Building," dated April 10, 1997.

M. L. Bowling letter to the NRC, "Millstone Nuclear Power Station, Unit No. 2 Proposed Revision to Technical Specifications Containment Isolation Valves(TAC No. M94623)," dated May 20, 1997.

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also proposed to be changed in a separate letter dated November 3, 1995<sup>3</sup>, which addressed the allowed outage time of an Emergency Core Cooling subsystem. The proposed changes contained in this letter do not assume approval of any of the previously submitted changes.

Attachment 1 provides a discussion of the proposed changes and the Safety Assessment. Attachment 2 provides the Significant Hazards Consideration. Attachment 3 provides the marked-up version of the appropriate pages of the current Technical Specifications. Attachment 4 provides the retyped pages of the Technical Specifications.

#### Environmental Considerations

NNECO has reviewed the proposed license amendment request against the criteria of 10CFR51.22 for environmental considerations. The proposed changes modify several Technical Specifications. These changes do not significantly increase the type and amounts of effluents that may be released offsite. In addition, this License Amendment Request will not significantly increase individual or cumulative occupational radiation exposures. Therefore, NNECO has determined the proposed changes will not have a significant effect on the quality of the human environment.

#### Conclusions

The proposed changes were evaluated utilizing the criteria of 10CFR50.59 and were determined to involve an unreviewed safety question because of the proposed changes to the allowed outage times. However, we have concluded that the proposed changes are safe.

The proposed changes do not involve a significant impact on public health and safety (see the Safety Assessment provided in Attachment 1) and do not involve a Significant Hazards Consideration pursuant to the provisions of 10CFR50.92 (see the Significant Hazards Consideration provided in Attachment 2).

# Plant Operations Review Committee and Nuclear Safety Assessment Board

The Plant Operations Review Committee and Nuclear Safety Assessment Board have reviewed and concurred with the determinations.

<sup>3</sup> 

E. A. DeBarba letter to the NRC, "Millstone Nuclear Power Station, Unit No. 2 Proposed Technical Specification Revision Emergency Core Cooling Subsystem Allowed Outage Time Extension," dated November 3, 1995.

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#### Schedule

We request issuance at your earliest convenience, with the amendment to be implemented within 30 days of issuance.

#### State Notification

In accordance with 10CFR50.91(b), a copy of this license amendment request is being provided to the State of Connecticut.

If you should have any questions on the above, please contact Mr. Ravi Joshi at (860) 440-2080.

> Very truly yours. NORTHEAST NUCLEAR ENERGY COMPANY

Martin L. Bowling, Jr.

Millstone Unit No. 2 - Recovery Officer

Sworn to and subscribed before me

this 2nd day of September, 1997 My Commission expires \_\_\_\_\_\_\_

Attachments (5)

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- H. J. Miller, Region I Administrator CC:
  - D. G. McDonald, Jr., NRC Project Manager, Millstone Unit No. 2
  - D. P. Beaulieu, Senior Resident Inspector, Millstone Unit No. 2
  - W. D. Travers, PhD, Director, Special Projects
  - W. D. Lanning, Director, Millstone Assessment Team

Director **Bureau of Air Management** Monitoring and Radiation Division Department of Environmental Protection

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Attachment 1

Millstone Nuclear Power Station, Unit No. 2 Proposed Revision to Technical Specifications Compliance Issues Discussion of Proposed Changes

September 1997

# Proposed Revision to Technical Specifications Compliance Issues Discussion of Proposed Changes

#### Introduction

Northeast Nuclear Energy Company (NNECO) is proposing to change Technical Specification Definition 1.8, Technical Specification 3.1.1.3, Technical Specification 3.4.6.2, Technical Specification 3.5.2, Technical Specification 3.6.1.1, Technical Specification 3.6.2.1, Technical Specification 3.6.2.2, and Technical Specification 5.5.1. If a comparable Technical Specification exists, the proposed changes are consistent with the new, improved Standard Technical Specifications (STS) for Combustion Engineering plants (NUREG-1432).

Each proposed change is discussed in the next section. Additional background information is included, as necessary, to explain the changes. Related changes are grouped together. However, the marked up pages contained in Attachment 3 are sequenced in numerical order.

# Description of Proposed Changes

The proposed changes are described below.

1. The Containment Spray (CS) System and the Containment Air Recirculation (CAR) and Cooling System provide sufficient heat removal capability to limit containment pressure and temperature to within design limits following a design basis loss of coolant accident (LOCA) or a main steam line break (MSLB). The CS System consists of two trains and the CAR and Cooling System consists of four CAR coolers. Two trains of CS and four CAR coolers provide approximately 200% of the required heat removal capacity. Loss of one CS train or one or two CAR coolers does not significantly degrade overall system capacity. The loss of one CS train and two CAR coolers, or four CAR coolers is equivalent to the loss of an entire train. The remaining equipment can provide sufficient heat removal capacity. (The loss of two CS trains is not acceptable because of the need for CS to mitigate a main steam break inside containment. CS is more effective at removing the energy contained in superheated steam.)

The current Technical Specifications 3.6.2.1, "Containment Spray System," and 3.6.2.2, "Containment Air Recirculation System" do not address the loss of one CS train and two CAR coolers. This can occur if the associated Reactor Building Closed Cooling Water (RBCCW) or Service Water (SW) train becomes inoperable. Since the current Technical Specifications do not address this situation, entry into LCO 3.0.3 would be required. This has occurred at Millstone

Unit No. 2 as reported in Licensee Event Report (LER) 97-022-00<sup>1</sup>. Therefore, the current Technical Specifications need to be modified to address this situation.

Index Page VII will be modified to combine Technical Specifications 3.6.2.1, "Containment Spray System," and 3.6.2.2, "Containment Air Recirculation System" into one Technical Specification 3.6.2.1, "Containment Spray and Cooling Systems."

Technical Specifications 3.6.2.1, "Containment Spray System," and 3.6.2.2, "Containment Air Recirculation System" will be combined into one Technical Specification 3.6.2.1, "Containment Spray and Cooling Systems." All requirements of the original Technical Specifications will be retained. However, the new Technical Specification will refer to containment cooling (CC) trains instead of individual CAR cooling units. Each CC train will consist of two CAR cooling units.

The proposed LCO 3.6.2.1, "Containment Spray and Cooling Systems," will require two CS trains and two CC trains (instead of four CAR cooling units, as discussed above) to be operable. The additional detail in the original LCO 3.6.2.1 will be relocated to the associated Bases. There is no technical difference between the original LCOs and the proposed LCO.

The proposed applicability remains the same. However, the footnote referenced by the "" has been reworded. The proposed wording will not change any technical aspect of the footnote.

The proposed changes to the original Technical Specification Action Statements (TSASs) are summarized in the following table.

The proposed changes to the TSAS account for the approximate 200% capacity when two CS trains and two CC trains are operable. Loss of one CS or CC train does not significantly degrade overall system capacity. An allowed outage time of 7 days is acceptable. The loss of one CS train and one CC train (two CAR cooling units), or two CC trains (four CAR cooling units) is equivalent to the loss of an entire train. (The loss of two CS trains is not acceptable because of the need for CS to mitigate a main steam break inside containment.) An allowed outage time for the loss of an emergency core cooling train, service water train, or reactor building closed cooling water train. The loss of any combinations not specifically addressed, would have required entry into LCO 3.0.3. The proposed change provides specific directions to enter LCO 3.0.3.

J. A. Price letter to the U.S. Nuclear Regulatory Commission, Millstone Nuclear Power Station, Unit No. 2, Licensee Event Report (LER) 97-022-00, "Technical Specification Violations," dated July 09, 1997.

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Inoperable Equipment	Current TSAS	Proposed TSAS	Improved TSAS NUREG 1432 (LCO 3.6.6B)
1 CS train	30 days TSAS 3.6.2.1.a	7 days	7 days
1 CAR	30 days TSAS 3.6.2.2.a	7 days - would inop a CC train	7 days - would inop a CC train
2 CARs	48 hours TSAS 3.6.2.2.c	7 days	7 days
1 CAR and 1CS	48 hours TSAS 3.6.2.1.b & 3.6.2.2.b	48 hours - would inop a CC train	72 hours - would inop a CC train
2 CARs and 1 CS	Not Covered (TS 3.0.3 shutdown)	48 hours	72 hours
3 or 4 CARs	Not Covered (TS 3.0.3 shutdown)	48 hours	72 hours
2 CS trains	Not Covered (TS 3.0.3 shutdown)	Plant shutdown required - see next item	72 hours
All other combinations	Not Covered (TS 3.0.3 shutdown)	Enter LCO 3.0.3 immediately	Enter LCO 3.0.3 immediately

All surveillance requirements have been retained. However, Surveillance Requirements 4.6.2.1.a-d have been renumbered as 4.6.2.1.1.a-d and Surveillance Requirements 4.6.2.2.a-c have been renumbered as 4.6.2.1.2.a-c.

Surveillance Requirement 4.5.2.c.5 will be revised by changing "4.6.2.1.c" to "4.6.2.1.1.c."

Minor wording changes have been made to replace "containment spray system" with "containment spray train" throughout the proposed Technical Specification. The containment spray system is composed of two trains. The original Technical Specification 3.6.2.1 incorrectly used the word "system" when referring to trains.

An \*\*\* will be added to the definition or containment integrity and an associated 2. footnote will be added to the bottom of the affected page. The footnote will explain how the requirement for an operable containment automatic isolation valve system is satisfied in Mode 4. When the plant is in Mode 4, the automatic containment isolation signals generated by low pressurizer pressure and high containment pressure are not required to be operable. Also, the low pressurizer pressure signal is blocked during the plant cooldown. This is acceptable because in Mode 4 automatic actuation of Engineered Safety Features Actuation System (ESFAS) functions is not required since adequate time is available for plant operators to evaluate plant conditions and respond by manually operating the ESF equipment. Because of the large number of valves actuated by a containment isolation actuation signal (CIAS), actuation is simplified by the use of the manual pushbuttons. Since the manual CIAS pushbuttons are required to be operable in Mode 4, credit can be taken for remote manual operation to close the containment isolation valves. This change is consistent with NUREG-1432 (Analog Bases 3.3.4).

An """ will be added to Surveillance Requirement 4.6.1.1.a and an associated footnote will be added to the bottom of the affected page. This is the same footnote explained above.

- 3. An "" will be added to Surveillance Requirement 4.1.1.3 and an associated footnote will be added to the bottom of the affected page. The footnote will exempt performance of Surveillance Requirement 4.1.1.3 when the plant is in Modes 1 or 2 because at least one reactor coolant pump will always be in operation (Technical Specification 3.4.1.1, "Coolant Loops and Coolant Circulation Startup and power Operation") and the required dilution flow of 1000 gpm will always be met. This exception will not apply if operating in accordance with Special Test Exception 3.10.4, "Physics Tests," which relaxes the requirements of Technical Specification 3.4.1.1.
- 4. Surveillance Requirements 4.4.6.2.a and 4.4.6.2.b of Technical Specification 3.4.6.2, "Reactor Coolant System Leakage," will be deleted. Neither of these surveillances verify compliance with the leakage limits specified in LCO 3.4.6.2. This LCO has specific leakage values that cannot be verified by monitoring the containment sump level or the containment atmosphere particulate radioactivity. These instruments provide indication of leakage, but cannot provide a value of leakage with the required accuracy to ensure compliance with the LCO. The operability and surveillance requirements for these instruments is addressed by Technical Specification 3.4.6.1, "Leakage Detection Systems." Surveillance Requirement 4.4.6.2.c will become 4.4.6.2 as a result of this change. This change is consistent with NUREG-1432 (LCOs 3.4.13 and 3.4.15).

- 5. Surveillance Requirement 4.5.2.e will be revised. The current wording, "will open to the correct position," implies it is necessary to verify the valve actually opens to the correct position. An acceptable method should be to manually open the valve to the required position, and then verify that the valve will not open further. However, the current wording does not allow this additional method. The proposed change will allow the use of alternate methods, as specified in the Bases, while ensuring the intent of the surveillance requirement is met. This change is consistent with NUREG-0212 and NUREG-1432.
- Technical Specification 5.5.1 will be modified by removing the word "original." The original design provisions contained in FSAR Section 6.3 have been changed. Therefore, it is not correct to refer to the original design provisions.

# Safety Assessment

The proposed changes will:

- 1. Combine Technical Specifications 3.6.2.1 and 3.6.2.2 into one specification; reduce the allowed outage time for one inoperable CS train or one inoperable CAR cooler from 30 days to 7 days; increase the allowed outage time for two inoperable CAR coolers from 48 hours to 7 days; add an allowed outage time of CS train and two inoperable CAR coolers, or three or four inoperable CAR coolers; provide specific guidance when it is necessary to enter Technical Specification 3.0.3; and expand the associated Bases to discuss these proposed
- Modify the definition of container ent integrity, modify Technical Specification 3.6.1.1, "Containment Integrity," and expand the associated Bases to explain why automatic containment isolation valves are operable in Mode 4.
- Provide an exception to Surveillance R squirement 4.1.1.3 when the plant is in Modes 1 and 2.
- 4. Delete Surveillance Requirements 4.4.6.2.a and 4.4.6.2.b.
- Modify Surveillance Requirement 4.5.2.e to allow the use of alternate methods and expand the associated Bases to discuss these alternate methods.
- Modify Technical Specification 5.5.1 by removing the word "original."
- Make editorial changes to terminology and item numbering.

Combining Technical Specifications 3.6.2.1, "Containment Spray System," and 3.6.2.2, "Containment Air Recirculation System," into one specification does not reduce the

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operability or surveillance requirements for either of these systems because all operability and surveillance requirements have been retained. Reducing the allowed outage time for one inoperable CS train or one inoperable CAR cooler from 30 days to 7 days will enhance overall system reliability by placing a higher priority on restoring the inoperable equipment. Increasing the allowed outage time for two inoperable CAR coolers from 48 hours to 7 days will not adversely affect overall system reliability because a 7 day allowable outage time still places a high priority on restoring the inoperable equipment. In addition, 7 days better reflects the amount of containment cooling, approximately 25%, that is inoperable. (25% is approximately equivalent to one CS train. Currently Technical Specification 3.6.2.1 allows 30 days to restore a CS train. This proposed change will reduce this to 7 days.) Adding an allowed outage time of 48 hours for one inoperable CS train and two inoperable CAR coolers, or three or four inoperable CAR coolers reflects the amount of containment cooling, approximately 50%, that is inoperable. This is equivalent to the loss of one entire train, and should have an equivalent allowed outage time. (Technical Specification 3.7.3.1, "Reactor Building Closed Cooling Water System," and 3.7.4.1, "Service Water System," allow 48 hours to restore an inoperable train.) Also, this configuration should not require entering Technical Specification 3.0.3. Finally, providing specific guidance when it is necessary to enter Technical Specification 3.0.3 does not change any current requirement. This just states the required action, instead of relying on interpretation by licensed operators. These proposed changes do not reduce any operability requirements or change any surveillance requirements. The proposed changes do modify allowed outage times. However, the changes will improve system reliability by providing allowed outage times that more accurately reflect the amount of system capability that is inoperable, and the changes will be consistent and based on the inoperable system capability. Therefore, the CS and CAR Systems will continue to function as designed to mitigate design basis accidents. In addition, these proposed changes are consistent with NUREG-1432.

Modifying Technical Specifications to state the requirement for an operable containment automatic isolation valve system is met by use of the manual containment isolation pushbuttons (in Mode 4) is acceptable because in Mode 4 automatic actuation of Engineered Safety Features Actuation System (ESFAS) functions is not required. Adequate time is available for plant operators to evaluate plant conditions and respond by manually operating the ESF equipment. Because of the large number of valves actuated by a containment isolation actuation signal (CIAS), actuation is simplified by the use of the manual pushbuttons. Since the manual CIAS pushbuttons are required to be operable in Mode 4, credit can be taken for remote manual operation to close the containment isolation valves. This change does not reduce operability or surveillance requirements for any containment isolation valve or Engineered Safety Feature Actuation System (ESFAS) component. Therefore, the containment isolation valves and ESFAS components will continue to function as designed to mitigate design basis accidents. This proposed change is consistent with the new, improved Standard Technical Specifications (STS) for Combustion Engineering plants (NUREG-1432).

Millstone Unit No. 2 is currently required to verify sufficient flow through the core during a reduction in Reactor Coolant System (RCS) boron concentration during all modes of operation. The proposed change will provide an exception to Surveillance Requirement 4.1.1.3 when the plant is in Mode 1 or 2. It is not necessary to perform Surveillance Requirement 4.1.1.3 because Millstone Unit No. 2 is required to have all four reactor coolant pumps (RCPs) in operation whenever the plant is in Mode 1 or 2 (Technical Specification 3.4.1.1). During normal Mode 1 or 2 operation, the loss of any RCP will result in the initiation of a reactor trip by the Reactor Protection System (RPS), which will place the plant in Mode 3. It is not necessary to verify sufficient core flow during a reduction in RCS boron concentration in Mode 1 or 2 because all RCPs will be in operation. This change will not result in any new approach to plant operation, it simply removes the requirement to perform an unnecessary surveillance. This oxception is not applicable if the plant is operating in accordance with Technical Specification 3.10.4, "Special Test Exception - Physics Test."

Surveillance Requirements (SRs) 4.4.6.2.a and 4.4.6.2.b do not verify compliance with the leakage limits contained in Technical Specification 3.4.6.2, "Reactor Coolant System Leakage." The equipment covered by these 2 SRs, containment atmosphere particulate radioactivity monitors and containment sump inventory monitor, provide early indication that RCS leakage exists, but do not provide the specific information (amount of leakage) necessary to verify operation within the leakage limits. Performance of an RCS water inventory balance (currently SR 4.4.6.2.c) will be used to verify compliance with the leakage limits. Operability of the containment atmosphere particulate radioactivity monitors and containment sump inventory monitor is verified by SRs 4.4.6.1.a and 4.4.6.1.b. Therefore, this change does not reduce the operability requirements for any equipment used to monitor for RCS leakage. This change is consistent with NUREG-1432.

Modifying Surveillance Requirement 4.5.2.e to allow the use of alternate methods and expanding the associated Bases to discuss these alternate methods does not reduce operability or surveillance requirements for any of the Emergency Core Cooling System (ECCS) throttle valves. Therefore, these ECCS throttle valves will continue to function as designed to mitigate design basis accidents.

Modifying Technical Specification 5.5.1 by removing the word "original" has no affect on how the plant is operated. This change will still require the ECCSs to be designed and maintained in accordance with the FSAR, however reference to original design is not appropriate since the systems can be changed by using approved processes. Therefore, the ECCSs will continue to function as designed to mitigate design basis accidents.

Expanding the Bases of the affected Technical Specifications to discuss the proposed changes, and making editorial changes to terminology and item numbering will have no affect on equipment operation. Therefore, all associated equipment will continue to function as before.

The proposed changes have no significant affect on how any of the associated systems or components function to mitigate the consequences of design basis accidents. Also, the proposed changes have no significant affect on any design basis accident previously evaluated. Therefore, there is no significant impact on the public health and safety.

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Attachment 2

Millstone Nuclear Power Station, Unit No. 2 Proposed Revision to Technical Specifications Compliance Issues Significant Hazards Consideration

September 1997

# Proposed Revision to Technical Specifications Compliance Issues Significant Hazards Consideration

# Significant Hazards Consideration

In accordance with 10CFR50.92, NNECO has reviewed the proposed changes and has concluded that they do not involve a significant hazards consideration (SHC). The basis for this conclusion is that the three criteria of 10CFR50.92(c) are not compromised. The proposed changes do not involve an SHC because the changes would not:

 Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change to combine Technical Specifications 3.6.2.1 and 3.6.2.2 into one specification reduces the allowed outage time for one inoperable containment spray (CS) train or one inoperable containment air recirculation (CAR) cooler from 30 days to 7 days; increases the allowed outage time for two inoperable CAR coolers from 48 hours to 7 days; adds an allowed outage time of 48 hours (instead of entering Technical Specification 3.0.3) for one inoperable CAR coolers; and provides specific guidance when it is necessary to enter Technical Specification 3.0.3 will not affect how these systems function to mitigate design basis accidents. Therefore, this change does not significantly increase the probability or consequences of an accident previously evaluated.

The proposed changes to modify the definition of containment integrity, modify the Technical Specification 3.6.1.1, "Containment Integrity," and expand the Bases to explain why automatic containment isolation valves are operable in Mode 4 have no affect on any containment isolation valve or Engineered Safety Feature Actuation System (ESFAS) component. These components will still forction as designed to mitigate design basis accidents. Therefore, this change

not significantly increase the probability or consequences of an accident iously evaluated.

The proposed change to provide an exception to Surveillance Requirement 4.1.1.3 when the plant is in Modes 1 and 2 will not result in any new approach to plant operation, it simply removes the requirement to perform an unnecessary surveillance. The minimum coolant flow through the core during a reduction in Reactor Coolant System (RCS) boron concentration will still be met. Therefore, this change does not significantly increase the probability or consequences of an accident previously evaluated.

The proposed change to delete Surveillance Requirements (SRs) 4.4.6.2.a and 4.4.6.2.b does not reduce the operability requirements for any equipment used to monitor RCS leakage. The equipment covered by these 2 SRs, containment atmosphere particulate radioactivity monitors and containment sump inventory monitor, provide early indication that RCS leakage exists, but do not provide the specific information (amount of leakage) necessary to verify operation within the leakage limits contained in Technical Specification 3.4.6.2, "Reactor Coolant System Leakage." Operability of the containment atmosphere particulate radioactivity monitory monitor is verified by SRs 4.4.6.1.2 and 4.4.6.1.b. Therefore, this change does not significantly increase the probability or consequences of an accident previously evaluated.

The proposed change to Surveillance Requirement 4.5.2.e to allow the use of alternate methods does not reduce operability or surveillance requirements for any of the Emergency Core Cooling System (ECCS) throttle valves. Therefore, these ECCS throttle valves will continue to function as designed to mitigate design basis accidents. Therefore, this change does not significantly increase the probability or consequences of an accident previously evaluated.

The proposed change to Technical Specification 5.5.1 has no affect on how the ECCS operates. The ECCS will still function as designed to mitigate design basis accidents. Therefore, this change does not significantly increase the probability or consequences of an accident previously evaluated.

The proposed changes to add information to the Bases of the affected Technical Specifications, and make editorial changes to terminology and item numbering will have no affect on equipment operation. Therefore, all associated equipment will continue to function as designed to mitigate design basis accidents. Therefore, this change does not significantly increase the probability or consequences of an accident previously evaluated.

Thus, this License Amendment Request does not impact the probability of an accident previously evaluated nor does it involve a significant increase in the consequences of an accident previously evaluated.

 Create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes do not alter the plant configuration (no new or different type of equipment will be installed) or require any new or unusual operator actions. They do not alter the way any structure, system, or component functions and do not alter the manner in which the plant is operated. The proposed changes do not introduce any new failure modes. They will not alter assumptions made in the safety analysis and licensing basis. The affected

components and systems will still function as designed to mitigate design basis accidents.

Therefore, these changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

Involve a significant reduction in a margin of safety.

The proposed changes will not reduce the margin of safety since they have no impact on any safety analysis assumption. The proposed changes do not decrease the scope of equipment currently required to be operable or subject to surveillance testing, nor do the proposed changes affect any instrument setpoints or equipment safety functions. The requirement to check containment radiation and containment sump level every 12 hours has been eliminated. However, this equipment is still required to be operable, and the surveillance requirements to verify operability have not been changed. Therefore, this equipment will be available to provide early indication of RCS leakage.

The effectiveness of Technical Specifications will be maintained since the changes will not alter the operation of any component or system. In addition, the changes are consistent with the new, improved Standard Technical Specifications (STS) for Combustion Engineering plants (NUREG-1432).

Therefore, there is no significant reduction in a margin of safety.

The NRC has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (March 6, 1986, 51 FR 7751) of amendments that are considered not likely to involve an SHC. The changes proposed herein to correct terminology and numbering are enveloped by example (i), a purely administrative change to Technical Specifications. All other changes proposed herein are not enveloped by a specific example.

As described above, this License Amendment Request does not impact the probability of an accident previously evaluated, does not involve a significant increase in the consequences of an accident previously evaluated, does not create the possibility of a new or different kind of accident from any accident previously evaluated, and does not result in a significant reduction in a margin of safety. Therefore, NNECO has concluded that the proposed changes do not involve an SHC.