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U. S. Nuclear Regulatory Commission
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Washington, D. C. 20555

PLANT VOGTLE - UNITS 1 and 2
NRC DOCKETS 50-424, 50-425
OPERATING LICENSES NPF-68, NPF-81
REQUEST TO REVISE TECHNICAL SPECIFICATION 3/4.6.1.6

Gentlemen:

In accordance with the provisions of 10 CFR 50.90 and 10 CFR 50.59, Georgia Power Company (GPC) hereby proposes to amend the Vogtle Electric Generating Plant Unit 1 and Unit 2 Technical Specifications, Appendix A to Operating Licenses NPF-68 and NPF-81.

The proposed amendment revises the action requirements and surveillance requirements of Specification 3/4.6.1.6, Containment Structural Integrity. The proposed changes to action requirements would eliminate unnecessary shutdown requirements by allowing for the performance of engineering evaluations of non-conforming conditions. The proposed changes to surveillance requirements incorporate plant-specific design, installation, and material considerations, provide greater detail regarding test methods and acceptance criteria, and minimize potentially destructive testing practices.

Enclosure 1 provides a detailed description of the proposed changes and the basis for the changes. Enclosure 2 provides our evaluation pursuant to 10 CFR 50.92 showing that the proposed changes do not involve significant hazards considerations. Enclosure 3 provides instructions for incorporation of the proposed amendment into the Technical Specifications and includes the proposed revised pages. GPC requests approval of the proposed amendment by July 14, 1989, to allow sufficient time to implement the revised requirements during Unit 1 surveillance scheduled for August 1, 1989.

A copy of this letter and all enclosures will be sent to the designated state official in accordance with 10 CFR 50.91.

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Georgia Power

Mr. W. G. Hairston, III states that he is a Senior Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company and that, to the best of his knowledge and belief, the facts set forth in this letter and enclosures are true.

GEORGIA POWER COMPANY

By: W. G. Hairston

W. G. Hairston, III

Sworn to and subscribed before me this 9th day of May, 1989.

Gwen Carter
Notary Public

MY COMMISSION EXPIRES JANUARY 12, 1993

JH/gm
Enclosures:
1. Basis for Proposed Changes
2. 10 CFR 50.92 Evaluation
3. Instructions for Incorporation

c(w): Georgia Power Company
Mr. P. D. Rice
Mr. C. K. McCoy
Mr. J. P. Kane
Mr. G. Bockhold, Jr
NORMS

U. S. Nuclear Regulatory Commission
Mr. S. Ebneter, Regional Administrator
Mr. J. B. Hopkins, Licensing Project Manager, NRR
Mr. J. F. Rogge, Senior Resident Inspector, Vogtle

State of Georgia
Mr. J. L. Ledbetter, Commissioner, Department of Natural Resources

CONTAINMENT STRUCTURAL INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.1.6 The structural integrity of the containment shall be maintained at a level consistent with the acceptance criteria in Specification 4.6.1.6.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

a. With more than one Unit 1 tendon with an observed lift-off force between the predicted lower limit and 90% of the predicted lower limit or with one tendon below 90% of the predicted lower limit, restore the tendon(s) to the required level of integrity within 15 days and perform an engineering evaluation of the Unit 1 containment and provide a Special Report to the Commission within 30 days in accordance with Specification 6.8.2 or place Unit 1 in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. In addition, within 90 days of completion of the Unit 1 evaluation, perform an engineering evaluation of Unit 2 containment and provide a Special Report to the Commission in accordance with Specification 6.8.2 or place Unit 2 in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

b. With abnormal degradation of the Unit 1 structural integrity as defined in 4.6.1.6.1.1 items b or c, or verify restore the containment ~~to the required level of~~ structural integrity within 72 hours and perform an engineering evaluation of Unit 1 containment and provide a Special Report to the Commission within 15 days in accordance with Specification 6.8.2 or place Unit 1 in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. In addition, within 90 days of completion of the Unit 1 evaluation, perform an engineering evaluation of the Unit 2 containment and provide a Special Report to the Commission in accordance with Specification 6.8.2 or place Unit 2 in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

c. With any abnormal degradation of the structural integrity other than that defined in ACTIONS a and b above at a or verify level below the acceptance criteria of Specification 4.6.1.6, restore the applicable containment ~~to the required level of~~ structural integrity within 72 hours and perform an engineering evaluation of the applicable containment and provide a Special Report to the Commission within 15 days in accordance with Specification 6.8.2 or place the applicable unit in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.6.1.1 Containment Tendons (Unit 1). The structural integrity of the Unit 1 containment tendons shall be demonstrated at the end of 1, 3, and 5 years following the initial containment vessel structural integrity test and at 5-year intervals thereafter. The structural integrity of the tendons shall be demonstrated by:

a. Determining that a random but representative sample of at least 13 tendons (4 inverted U and 9 hoop) each have an observed lift-off

SURVEILLANCE REQUIREMENTS (Continued)

greater than or equal to the force ~~within~~ predicted lower limits for each. For each subsequent inspection one tendon from each group may be kept unchanged to develop a history and to correlate the observed data. See Insert A If the observed lift-off force of any one tendon in the original sample population lies between the predicted lower limit and 90% of the predicted lower limit, two tendons, one on each side of this tendon should be checked for their lift-off forces. If both of these adjacent tendons are found to be greater than or equal to ~~within~~ their predicted lower limits, all three tendons should be restored to the required level of integrity. This single deficiency may be considered unique and acceptable. Unless there is abnormal degradation of the containment during the first three inspections, the sample population for subsequent inspections shall include at least 5 tendons (2 inverted U and 3 hoop). ~~This test shall include essentially complete detensioning of each tendon to determine if any strands are broken or damaged.~~

b. ~~Removing a strand from~~ One hoop tendon and one inverted U tendon ~~and~~ See Insert B performing an inspection and material test. It shall be determined that over the entire length of both removed strands:

1) The tendon wires or strands are free of corrosion, cracks, and damage,

2) There are no changes in the presence or physical appearance of the sheathing filler-grease, and

3) A minimum tensile strength of 270,000 psi (guaranteed ultimate strength of the tendon material) for at least three strand samples (one from each end and one at mid-length) cut from each removed strand. Failure of any one of the strand samples to meet the minimum tensile strength test is evidence of abnormal degradation of the containment structure.

c. Performing tendon retensioning of ~~those~~ tendons detensioned ~~for~~ as close as possible ~~inspection~~ to their observed or predicted lift-off force ~~with a tolerance limit of +6%. During retensioning of these tendons, the changes in load and elongation should be measured simultaneously at a minimum of three approximately equally spaced levels of force between zero and the seating force.~~ See Insert C If the elongation ~~corresponding to a specific load~~ between 16% GUTS and 80% GUTS differs by more than 5% from that recorded during installation, an investigation should be made to ensure that the difference is not related to wire failures or slip of wires in anchorages;

~~d. Assuring the observed lift-off forces are between the maximum and minimum values given in the tendon surveillance procedure.~~

~~e.~~ Verifying the OPERABILITY of the sheathing filler grease by: See Insert D

Move to 4.6.1.6.4

1) No voids in excess of 5% of the net duct volume,

2) Minimum grease coverage exists for the different parts of the anchorage system, and

3) The chemical properties of the filler material are within the following ~~tolerance~~ limits; ~~as specified by the manufacturer~~.

See Insert E

INSERT A

Lift-off measurements shall be accomplished by unseating and reseating of tendon anchorages without complete detensioning.

INSERT B

shall be detensioned to permit removal of a strand from each for

INSERT C

whichever is greater but not to exceed a stress level of 70% of the guaranteed ultimate tensile strength (GUTS) for the tendon material. The 16% GUTS to 80% GUTS elongation of a tendon retensioned following strand removal shall not differ from the original elongation by more than 5%,.

INSERT D

as indicated by the difference between the volume of grease removed and grease replaced divided by the net volume of the duct.

INSERT E

Water Soluble Chlorides	10 PPM Maximum
Water Soluble Nitrates	10 PPM Maximum
Water Soluble Sulfides	10 PPM Maximum
Water Content	10% Dry Weight Maximum
Base Number	Greater than 0

Testing shall be in accordance with the methods specified in ASME section XI, Subsection IWL 2525 table 2525-1

INSERT F

a. All end anchorages including anchor blocks, wedges, shims and bearing plates: inspect for moisture, corrosion and cracks and for warping of bearing plates.

b. Concrete surfaces adjacent to hoop tendon anchorages: inspect for moisture, corrosion, distortion and cracking.

c. Steel plating surrounding the inverted U tendon anchorages: inspect for moisture, corrosion, distortion and cracking.

SURVEILLANCE REQUIREMENTS (Continued)

4.6.1.6.1.2 Containment Tendons - Unit 2. The structural integrity of the Unit 2 containment tendons shall be demonstrated at the end of 1, 3, and 5 years following the initial containment vessel structural integrity test and at 5-year intervals thereafter. The structural integrity of of the tendons shall be demonstrated by a visual examination of the tendon anchorage hardware (to the extent practical and without dismantling load bearing components of the anchorage) of a representative sample of tendons selected in the same manner as described in Specification 4.6.1.6.1.1.

4.6.1.6.2 End Anchorages and Adjacent ~~Concrete~~ Surfaces. The structural integrity of the end anchorages of all tendons inspected pursuant to Specification 4.6.1.6.1 and the adjacent ~~concrete~~ surfaces shall be demonstrated by visual determining through inspection that no apparent changes have occurred ~~in the visual appearance of the end anchorage or the concrete crack patterns adjacent to the end anchorages. Inspections of the concrete shall be performed during the Type A containment leakage rate tests (reference Specification 4.6.1.2) while the containment is at its maximum test pressure.~~ See Insert F

4.6.1.6.3 Containment Surfaces. The structural integrity of the exposed accessible interior and exterior surfaces of the containment including the liner plate, shall be determined during the shutdown for each Type A containment leakage rate test (reference Specification 4.6.1.2) by a visual inspection of these surfaces. This inspection shall be performed prior to the Type A containment leakage rate test to verify no apparent changes in appearance or other abnormal degradation.

4.6.1.6.4 Former Item e from Page 3/4 6-9

3/4.6.1.5 AIR TEMPERATURE

The limitations on containment average air temperature ensure that the overall containment average air temperature does not exceed the initial temperature condition assumed in the safety analysis for a steam line break accident. Measurements shall be made at all listed locations, whether by fixed or portable instruments, prior to determining the average air temperature.

3/4.6.1.6 CONTAINMENT STRUCTURAL INTEGRITY

This limitation ensures that the structural integrity of the containment will be maintained comparable to the original design standards for the life of the facility. Structural integrity is required to ensure that the containment will withstand the maximum pressure of 41.9 psig in the event of a steam line break accident. The measurement of containment tendon lift-off force, the visual examination of tendons, and the tensile tests of the tendon strands for Unit 1, anchorages and exposed interior and exterior surfaces of the containment and the Type A leakage test for both units are sufficient to demonstrate this capability. (The tendon strand samples will also be subjected to stress cycling tests and to accelerated corrosion tests, as required to simulate the tendon's operating conditions and environment.) Unit 1 and Unit 2 containments satisfy the recommendations of Regulatory Guide 1.35, Revision 2, Position C.1 3. Therefore, Unit 2 containment is subject to visual inspection only.

The Surveillance Requirements for demonstrating the structural integrity of each containment utilize ~~is in compliance with~~ the recommendations of Revision 2 of Regulatory Guide 1.35, "Inservice Surveillance of Ungrouted Tendons in Prestressed Concrete Containment Structures," and proposed Regulatory Guide 1.35.1, "Determining Prestressing Forces for Inspection of Prestressed Concrete Containments," April 1979, as discussed in FSAR section 3.8.

The required Special Reports from any engineering evaluation of containment abnormalities shall include a description of the tendon condition, the condition of the concrete (especially at tendon anchorages) or steel plating surrounding the inverted U tendons, the inspection procedures, the tolerances on cracking, the results of the engineering evaluation, and the corrective actions taken.

3/4.6.1.7 CONTAINMENT VENTILATION SYSTEM

The 24-inch containment purge supply and exhaust isolation valves are required to be sealed closed during plant operations since these valves have not been demonstrated capable of closing during a LOCA or steam line break accident. Maintaining these valves sealed closed during plant operation ensures that excessive quantities of radioactive materials will not be released via the Containment Purge System. To provide assurance that these containment valves cannot be inadvertently opened, the valves are sealed closed in accordance with Standard Review Plan 6.2.4. Sealed closed isolation valves are isolation valves under administrative control to assure that they cannot be inadvertently opened. Administrative control includes mechanical devices to seal or lock the valve closed, the use of blind flanges, or removal of power to the valve operator.

ENCLOSURE 1

PLANT VOGTLE - UNITS 1 AND 2
NRC DOCKETS 50-424, 50-425
OPERATING LICENSES NPF-68, NPF-81
REQUEST TO REVISE TECHNICAL SPECIFICATION 3/4.6.1.6
BASIS FOR PROPOSED CHANGES

PROPOSED CHANGES

The proposed changes are described in detail in the following paragraphs and are also provided in the form of a mark-up of the current Unit 1 and Unit 2 Technical Specification pages.

1. Revise "restore the containment to the required level of integrity" to "restore or verify the containment structural integrity".

2. Revise the detensioning requirement from all sample tendons to one tendon of each type.

3. Modify retensioning requirements to ensure no overstressing of strands and to account for the fact that elongation measurements at 3 equally spaced levels of force between zero and the seating force were not taken during initial installation.

4. Delete redundant acceptance criteria regarding lift-off forces and delete requirements on upper bound of lift-off force.

5. Move all sheathing filler grease operability requirements to 4.6.1.6.4 so that the requirements may apply to both units.

6. Provide prescriptive means by which to determine voids in the tendon duct volume.

7. Revise the chemical property acceptance criteria from "as specified by the manufacturer" to include specific criteria in the technical specification.

8. Provide definitions for visual inspection and revise requirement for visual inspection around inverted U tendon anchorages to reflect the specific conditions existing at VEGP.

9. Revise the end anchorage and adjacent concrete surface inspection requirements such that they may be performed during tendon surveillance rather than Type A testing.

REQUEST TO REVISE TECHNICAL SPECIFICATION 3/4.6.1.6
BASIS FOR PROPOSED CHANGES

PROPOSED CHANGES (CONT'D)

10. The Bases are revised to clarify which inspections are done on each unit, clarify that the tendon samples are only stress cycled or subjected to accelerated corrosion tests if these conditions are suspected during the surveillance, and add reference to the FSAR for conformance of the surveillance requirements to Regulatory Guide 1.35, Revision 2.

BASIS

1. Action items b and c refer to testing and visual inspection of components such as grease, anchor heads, shims, bearing plates and concrete. When a certain condition such as discoloration of grease or presence of minor corrosion on a shim or bearing plate exists, it may not be possible to restore the component to it's original state within 72 hours. Yet, such conditions do not have an immediate impact on the containment structural capability. In most of these instances, the immediate containment capability can be verified without immediate restoration to the original condition. If such verification is provided, unnecessary shutdown can be avoided. It should be noted that stresses and thermal cycling due to the shutdown and start-up process could present more serious problems and safety concerns by causing damage to other components of the containment than could be benefited from shutting down to correct a possible concern which has no immediate implications. Therefore, the proposed change is more beneficial from a safety standpoint than the present requirement. When a sound verification is not possible, the change would have no affect on the present requirement, i.e., a plant shutdown would be required.

2. Regulatory Guide 1.35, Revision 2 recommends detensioning all tendons in the sample to determine if there are any broken strands or wires. Since issuance of Revision 2 of the Regulatory Guide, industry sources have indicated that complete detensioning of a sample tendon is not necessary to determine if a tendon is defective and that dismantling and retensioning causes potential damage to the tendon and therefore should be minimized This finding was reflected in the proposed revision 3 to Regulatory Guide 1.35 which requires complete detensioning of only one tendon from each type. Therefore, the requirement to detension all tendons has been revised to require that only one tendon of each type be detensioned.

REQUEST TO REVISE TECHNICAL SPECIFICATION 3/4.6.1.6
BASIS FOR PROPOSED CHANGES

BASIS (CONT'D)

3. During initial installation of the tendons, elongation measurements were made at 16% GUTS and 80% GUTS. The current Technical Specification requirement to measure the elongation at a minimum of three equally spaced levels of force between zero and the seating force does not allow for comparison with the initial installation information. Therefore, the surveillance requirements are revised to reflect the initial installation comparison points. The elongation measurements will still be taken at three points to ensure smooth elongation during the retensioning process.

   The current Technical Specification requirements for retensioning of tendons can cause conflicting requirements between the specified lift-off force and the desire not to tension a tendon at greater than 70% of the Guaranteed Ultimate Tensile Strength (GUTS). The current Technical Specification requires that the tendon be retensioned to its as found condition within +6% / -0%. However considering that one strand has been removed retensioning to the as found lift-off force could possibly cause the tendon to be stressed to greater than 70% of the GUTS. Retensioning to the observed or predicted lift-off force, whichever is greater, without exceeding 70% of GUTS would allow compensation for the removed strand while maintaining the tendon at an acceptable lift-off force.

4. The current Technical Specification requires in 4.6.1.6.1.a that the observed lift-off forces be within the predicted limits while 4.6.1.6.1.d states "lift-off forces are between the maximum and minimum given in the tendon surveillance procedure". In the present proposed change, the requirement to meet the upper bound has been removed. If the measured lift-off force is greater than predicted, this is not an indication of abnormal degradation but indication of conservatisms in the methodology used to predict tendon stress losses over time.

5. The current Technical Specification acceptance criteria for sheathing filler grease is written such that it applies only to Unit 1. In order for the OPERABILITY requirements to apply to both Units, they were moved to 4.6.1.6.4.

6. The current Technical Specifications specify the operability of the sheathing filler grease in terms of assuring that there are no voids in excess of 5% of the net duct value without specific reference how to calculate the void percentage. The revised Technical Specification provides a definition of how to calculate % void. This change does not alter the previous requirements but provides a more prescriptive definition of how the acceptance criteria are to be met.

REQUEST TO REVISE TECHNICAL SPECIFICATION 3/4.6.1.6
BASIS FOR PROPOSED CHANGES

BASIS (CONT'D)

7. The current Technical Specification defines the acceptable tolerance limits for chemical properties of the filler grease as those defined by the manufacturer. It is difficult for the manufacturer of the filler grease to define acceptable properties considering length of service and specific usage. Recently ASME has published guidelines for filler grease chemical properties when used in concrete containments. These guidelines (with the exception of Base Number and Water Content) are incorporated in the Technical Specification. The acceptance criteria for Base Number and Water Content are based on current industry standards. This change does not modify the intent of monitoring the grease properties but provides definition of acceptance criteria in terms of recognized standards.

8. The current Technical Specification for end anchorages and surrounding surfaces requires that "no apparent changes have occurred in the visual appearance of the end anchorage or the concrete crack patterns adjacent to the end anchorages", but does not provide specific acceptance criteria. The proposed revision defines specific acceptance criteria. Because each individual tendon is not examined at each surveillance interval, reference to "changes" is not necessarily meaningful. Regulatory Guide 1.35, Revision 2 states that "the surrounding concrete should also be checked visually for indications of abnormal behavior." The proposed acceptance criteria are consistant with current industry standards. This revision does not change the intent of the surveillance and is consistent with the Regulatory Guide recommendations. It should be noted that, if any abnormal behavior is found, documentation (concrete crack map, photograph or written description) of the as found condition is made for evaluation purposes as well as to allow for comparison at later dates.

   The current Technical Specification requires inspection of the concrete surface adjacent to the end anchorages. However, the VEGP design is such that the concrete surrounding the end anchorages of the inverted U tendons is covered by steel plates. Therefore, this surveillance can not be performed exactly as specified. An alternative of inspecting for distortion in the steel plates and other visual observations is proposed. This revision does not change the intent of the surveillance to look for abnormal material behavior but provides a better definition of how it should be applied to VEGP.

REQUEST TO REVISE TECHNICAL SPECIFICATION 3/4.6.1.6
BASIS FOR PROPOSED CHANGES

BASIS (CONT'D)

9. The current Technical Specification requires inspection of the end anchorages and adjacent surfaces during the Type A test. The Type A test is performed at 40 month intervals while the structural integrity surveillance is performed at intervals of 1, 3, and 5 years following the initial structural integrity test and at 5 year intervals thereafter. Thus, the inspection period for the ILRT does not coincide with the inspection period for the tendon surveillances. The acceptance criteria and the nature of abnormalities inspected for at the end anchorages and exposed surfaces are not significantly influenced by the interal pressure of the containment. In addition, performing this surveillance while the qualified tendon inspection personnel are available will lead to more uniform application of the acceptance criteria. Therefore, the additional information gained by inspection at the peak ILRT pressure does not warrant the additional cost and degree of difficulty required to per form this inspection.

10. Revision to the Bases was required because the surveillance requirements as revised do not explicitly meet all recommendations of Revision 2 of Regulatory Guide 1.35. The specific exceptions will be discussed in the FSAR. In addition, the Bases were clarified with respect to the Regulatory Guide recommendations regarding stress cycling and accelerated corrosion tests.

ENCLOSURE 2

PLANT VOGTLE - UNITS 1 AND 2
NRC DOCKETS 50-424, 50-425
OPERATING LICENSES NPF-68, NPF-81
REQUEST TO REVISE TECHNICAL SPECIFICATION 3/4.6.1.6

In accordance with 10 CFR 50.92, Georgia Power Company has evaluated the attached proposed amendment to the Technical Specifications and has determined that operation of the facility in accordance with the proposed amendment would not involve significant hazards considerations. In support of this conclusion the following analysis is provided:

ANALYSIS

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change revises the action requirements and surveillance requirements of the Containment Structural Integrity Technical Specifications. The change does not involve any physical alteration of the containment or any change to a setpoint or operating parameter. The change does not add any new equipment which could be the source of a malfunction or accident. Since the change does not affect equipment involved in the initiation of previously evaluated accidents, the probability of such accidents is not increased. With respect to the consequences of previously evaluated accidents, the change ensures that the mitigation capability of the containment is not decreased. The proposed changes to action statements b and c are as restrictive as those in the current Technical Specifications in the sense that a condition of significant structural integrity degradation is required to be corrected within 72 hours or the unit(s) shut down. For conditions not involving significant degradation, the proposed action statements do not dictate unit shutdown; however, continued structural capability is required to be verified within 72 hours. The proposed action statements continue to require an engineering evaluation of deviations from acceptance criteria. The proposed surveillance requirements provide greater detail regarding test methods and acceptance criteria, and incorporate Vogtle-specific design, installation, and material considerations. Removal of the upper limit on lift-off forces eliminates needless entry into an action statement for a condition not involving abnormal degradation. Revisions to tendon detensioning and retensioning requirements minimize the possibility of damage during testing. Performing visual inspections of end anchorages and adjacent surfaces during tendon surveillance as opposed to during Type A testing will result in more uniform application of test criteria. Based on the above discussion, the proposed action requirements and surveillance requirements assure that containment structural integrity will be maintained at or above the level required by the current Technical Specifications. The containment will, therefore, continue to be capable of mitigating accidents as discussed in FSAR Chapters 6 and 15. Hence, the consequences of previously evaluated accidents are not increased.

ANALYSIS (CONT'D)

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. The change does not add any new equipment to the plant or require any existing equipment to be operated in a different manner from which it was designed to operate. Since a new failure mode is not introduced by the change, a new or different kind of accident could not result.

3. The proposed change does not involve a significant reduction in a margin of safety. The change does not affect any safety limits or limiting safety system settings. The change does not involve a reduction of acceptance criteria where the potential for significant structural integrity degradation exists. The proposed action statements and surveillance requirements assure that the capability to withstand the maximum containment pressure of 41.9 psig in the event of a main steam line break is maintained over the life of the facility. Margins of safety are therefore not decreased.

CONCLUSIONS

Based on the preceding analysis, GPC has determined that the proposed changes to the Technical Specifications do not involve a significant increase in the probability or consequences of previously evaluated accidents, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety. GPC therefore concludes that the proposed changes meet the requirements of 10 CFR 50.92(c) and do not involve significant hazards considerations.