

ATTACHMENT 2A TO C1199-11

TECHNICAL SPECIFICATIONS PAGES
MARKED TO SHOW PROPOSED CHANGES

REVISED PAGES
UNIT 1

3/4 5-1
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3/4 **LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS**
3/4.5 **EMERGENCY CORE COOLING SYSTEMS (ECCS)**

ACCUMULATORS

LIMITING CONDITION FOR OPERATION

3.5.1 Each reactor coolant system accumulator shall be OPERABLE with:

- a. The isolation valve open,
- b. A contained borated water volume of between 921 and 971 cubic feet,
- c. A boron concentration between 2400 ppm and 2600 ppm, and
- d. A nitrogen cover-pressure of between 585 and 658 psig.

APPLICABILITY: MODES 1, 2 and 3.*

ACTION:

- a. With one accumulator inoperable, due to boron concentration not within limits, restore boron concentration to within limits within 72 hours or be in at least Mode 3 within the next 6 hours and reduce ~~pressurizer~~ reactor coolant system pressure to less than or equal to 1000 psig within the following 6 hours.
- b. With one accumulator inoperable for reasons other than boron concentration not within limits, restore the accumulator to OPERABLE status within 1 hour, or be in at least Mode 3 within the next 6 hours and reduce ~~pressurizer~~ reactor coolant system pressure to less than or equal to 1000 psig within the following 6 hours.

SURVEILLANCE REQUIREMENTS

4.5.1 Each accumulator shall be demonstrated OPERABLE:

- a. At least once per 12 hours by:
 1. Verifying the contained borated water volume and nitrogen cover-pressure in the tanks, and
 2. Verifying that each accumulator isolation valve is open.

*~~Pressurizer~~ Reactor Coolant System Pressure above 1000 psig.

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

SURVEILLANCE REQUIREMENTS (Continued)

- b. At least once per 31 days and, for the affected accumulator(s), within 6 hours after each solution volume increase of greater than or equal to 1% of tank volume (that is not the result of addition from the refueling water storage tank) by verifying the boron concentration of the accumulator solution.

- c. At least once per 31 days when the RCS pressure is above 2000 psig, by verifying that power to the isolation valve operator is disconnected by removal of the breaker from the circuit ~~is removed from each accumulator isolation valve operator.~~

3/4.5.1 ACCUMULATORS

The OPERABILITY of each RCS accumulator ensures that a sufficient volume of borated water will be immediately forced into the reactor core through each of the cold legs in the event the RCS pressure falls below the pressure of the accumulators. This initial surge of water into the core provides the initial cooling mechanism during large RCS pipe ruptures.

The limits on accumulator volume, boron concentration and pressure ensure that the assumptions used for accumulator injection in the safety analysis are met.

The accumulator power operated isolation valves are considered to be "operating bypasses" in the context of IEEE Std. Standard 279-1971, which requires that bypasses of a protective function be removed automatically whenever permissive conditions are not met. In addition, as these accumulator isolation valves fail to meet single failure criteria, removal of power to the valves is required. Verification every 31 days that power is removed from each accumulator isolation valve operator when the RCS pressure is greater than 2000 psig ensures that an active failure could not result in the undetected closure of an accumulator motor-operated isolation valve.

If the boron concentration of one accumulator is not within limits, it must be returned to within the limits within 72 hours. In this Condition, ability to maintain subcriticality or minimum boron precipitation time may be reduced. The boron in the accumulators contributes to the assumption that the combined ECCS water in the partially recovered core during the early reflooding phase of a large break LOCA is sufficient to keep that portion of the core subcritical. One accumulator below the minimum boron concentration limit, however, will have no effect on available ECCS water and an insignificant effect on core subcriticality during reflood. Boiling of ECCS water in the core during reflood concentrates boron in the saturated liquid that remains in the core. In addition, current analysis techniques demonstrate that the accumulators do not discharge following a large main steam line break for the majority of plants. Even if they do discharge, their impact is minor and not a design limiting event. Thus, 72 hours is allowed to return the boron concentration to within limits.

If one accumulator is inoperable for a reason other than boron concentration, the accumulator must be returned to OPERABLE status within 1 hour. In this Condition, the required contents of three accumulators cannot be assumed to reach the core during a LOCA. Due to the severity of the consequences should a LOCA occur in these conditions, the 1 hour completion time to open the valve, remove power to the valve, or restore the proper water volume or nitrogen cover pressure ensures that prompt action will be taken to return the inoperable accumulator to OPERABLE status. The completion time minimizes the potential for exposure of the plant to a LOCA under these conditions.

If the accumulator cannot be returned to OPERABLE status within the associated completion time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to MODE 3 within 6 hours and pressurizer RCS pressure reduced to ≤ 1000 psig within 12 hours. The

ATTACHMENT 2B TO C1199-11

TECHNICAL SPECIFICATIONS PAGES
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UNIT 2

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3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

ACCUMULATORS

LIMITING CONDITION FOR OPERATION

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APPLICABILITY: MODES 1, 2 and 3.*

ACTION:

- a. With one accumulator inoperable due to boron concentration not within limits, restore boron concentration to within limits within 72 hours or be in at least Mode 3 within the next 6 hours and reduce ~~pressurizer~~ reactor coolant system pressure to less than or equal to 1000 psig within the following 6 hours.
- b. With one accumulator inoperable for reasons other than boron concentration not within limits, restore the accumulator to OPERABLE status within 1 hour, or be in at least Mode 3 within the next 6 hours and reduce ~~pressurizer~~ reactor coolant system pressure to less than or equal to 1000 psig within the following 6 hours.

SURVEILLANCE REQUIREMENTS

4.5.1 Each accumulator shall be demonstrated OPERABLE:

- a. At least once per 12 hours by:
 1. Verifying the contained borated water volume and nitrogen cover-pressure in the tanks, and
 2. Verifying that each accumulator isolation valve is open.

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3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

SURVEILLANCE REQUIREMENTS (Continued)

- b. At least once per 31 days and, for the affected accumulator(s), within 6 hours after each solution volume increase greater than or equal to 1% of tank volume (that is not the result of addition from the refueling water storage tank) by verifying the boron concentration of the accumulator solution.

- c. At least once per 31 days when the RCS pressure is above 2000 psig by verifying that power to the isolation valve operator is disconnected by removal of the breaker from the circuit is removed from each accumulator isolation valve operator.

3/4 BASES

3/4.5 EMERGENCY CORE COOLING SYSTEMS

3/4.5.1 ACCUMULATORS

The OPERABILITY of each RCS accumulator ensures that a sufficient volume of borated water will be immediately forced into the reactor core through each of the cold legs in the event the RCS pressure falls below the pressure of the accumulators. This initial surge of water into the core provides the initial cooling mechanism during large RCS pipe ruptures.

The limits on accumulator volume, boron concentration and pressure ensure that the assumptions used for accumulator injection in the safety analysis are met.

The accumulator power operated isolation valves are considered to be "operating bypasses" in the context of IEEE Std. Standard 279-1971, which requires that bypasses of a protective function be removed automatically whenever permissive conditions are not met. In addition, as these accumulator isolation valves fail to meet single failure criteria, removal of power to the valves is required. Verification every 31 days that power is removed from each accumulator isolation valve operator when the RCS pressure is greater than 2000 psig ensures that an active failure could not result in the undetected closure of an accumulator motor-operated isolation valve.

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REVISED PAGES

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3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
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ACCUMULATORS

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3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

SURVEILLANCE REQUIREMENTS (Continued)

- b. At least once per 31 days and, for the affected accumulator(s), within 6 hours after each solution volume increase of greater than or equal to 1% of tank volume (that is not the result of addition from the refueling water storage tank) by verifying the boron concentration of the accumulator solution.
- c. At least once per 31 days when the RCS pressure is above 2000 psig, by verifying that power is removed from each accumulator isolation valve operator.

3/4 BASES
3/4.5 EMERGENCY CORE COOLING SYSTEMS

3/4.5.1 ACCUMULATORS

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PROPOSED TECHNICAL SPECIFICATIONS PAGES

REVISED PAGES

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3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

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SURVEILLANCE REQUIREMENTS (Continued)

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3/4 BASES
3/4.5 EMERGENCY CORE COOLING SYSTEMS

3/4.5.1 ACCUMULATORS

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ATTACHMENT 4 TO C1199-11

NO SIGNIFICANT HAZARDS CONSIDERATION EVALUATION

Indiana Michigan Power Company (I&M) has evaluated this proposed amendment and determined that it does not involve a significant hazard. According to 10 CFR 50.92(c), a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not:

1. involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated;
2. create the possibility of a new or different kind of accident from any previously analyzed; or
3. involve a significant reduction in a margin of safety.

I&M proposes to revise T/S Surveillance Requirement 4.5.1.c to require verification that power is removed from each emergency core cooling system accumulator isolation valve operator instead of verification that each accumulator isolation valve breaker from the circuit. In addition, I&M proposes to revise T/S 3.5.1 to change "pressurizer pressure" to "reactor coolant system pressure" in the applicability and action statement requirements. The Bases for T/S 3/4.5.1 will also be revised to reflect both changes. Additionally, administrative changes are proposed to the page format.

The determination that the criteria set forth in 10 CFR 50.92 are met for this amendment request is indicated below.

1. Does the change involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated?

The ECCS accumulators are used to mitigate the consequences of an accident after the event has occurred and do not initiate any accident previously evaluated. Demonstrating how power is removed from the valve operator does not initiate an accident. Inadvertently closing the valves cannot initiate an accident. Therefore, there is no significant increase in the probability of occurrence of an accident previously evaluated.

The ECCS accumulators will still perform their function of injecting borated water into the reactor coolant loops following a large break loss-of-coolant accident, as described in Section 14.3.1 of the Updated Final Safety Analysis Report (UFSAR). A spurious closure of an accumulator outlet isolation valve is not a credible event. Performing T/S Surveillance Requirement 4.5.1.c provides assurance that one of the two actions required for spurious closure of the valve is precluded. The proposed change to the surveillance continues to provide

assurance that power will be removed from each accumulator isolation valve operator so that the valves remain open. The consequences of accidents previously evaluated remained bounded because the accumulators will still function as assumed in the UFSAR accident analysis. Therefore, there is no significant increase in the consequences of any accident previously evaluated.

Changing “pressurizer pressure” to “RCS pressure” has no significant effect on the applicability of the T/S requirements. RCS pressure and pressurizer pressure instrumentation measure a similar parameter in the primary coolant system. Since the RCS is a closed-loop fluid system, pressure instruments should indicate approximately the same value. There is no significant difference between the instrument readings because they are corrected for range, height, and accuracy. There is no significant change in the margin of pressure between when the accumulators are required to be aligned at 1000 psig and the upper limit specified in T/S 3.5.1.d of 658 psig.

The proposed format changes are administrative and have no impact on plant operation.

Therefore, the proposed changes do not increase the probability of occurrence or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed changes to T/S 3/4.5.1 and the associated Bases do not involve any physical changes to the plant, but do change the way the plant is operated by changing the method for ensuring spurious closure of the accumulator isolation valve will not occur. The proposed change to T/S Surveillance Requirement 4.5.1.c does not create any new operator actions. The position of the accumulator isolation valve remains open in Modes 1, 2, and 3 with RCS pressure greater than 1000 psig, which meets its design safety function. The proposed change does not increase the possibility of the accumulator valve repositioning. In order for repositioning to happen, the operator must close the molded-case circuit breaker coupled with either an active single failure or deliberate operator action in the control room. The proposed change of verifying that power is removed from the accumulator isolation valve provides the same level of protection. Two positive actions are required for the accumulator isolation valve to reposition.

The proposed format changes are administrative and have no impact on plant operation.

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

3. Does the change involve a significant reduction in a margin of safety?

T/S Surveillance Requirement 4.5.1.c provides requirements that ensure that a single action will not cause an inadvertent closure of the accumulator isolation valves. The proposed change continues to ensure that two positive actions, an operator action to restore the breaker and a single failure, are required for valve closure.

Changing “pressurizer pressure” to “RCS pressure” does not impact operation of the accumulators. The proposed changes do not impact the nitrogen cover pressure as stated in T/S 3.5.1.c. The accumulators would not be expected to inject borated water until RCS pressure lowers to 658 psig (the upper limit specified in T/S 3.5.1.d). The change does not affect when this would occur after an accident. Therefore, changing “pressurizer pressure” to “RCS pressure” has no impact on plant operation.

The proposed format changes are administrative and have no impact on plant operation.

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

In summary, based upon the above evaluation, I&M has concluded that the proposed amendment involves no significant hazards consideration.

ATTACHMENT 5 TO C1199-11

ENVIRONMENTAL ASSESSMENT

Indiana Michigan Power Company (I&M) has evaluated this license amendment request against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. I&M has determined that this license amendment request meets the criteria for a categorical exclusion set forth in 10 CFR 51.22(c)(9). This determination is based on the fact that this change is being proposed as an amendment to a license issued pursuant to 10 CFR 50 that changes a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or that changes an inspection or a surveillance requirement, and the amendment meets the following specific criteria.

- (i) The amendment involves no significant hazards consideration.

As demonstrated in Attachment 4, this proposed amendment does not involve significant hazards consideration.

- (ii) There is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite.

There will be no significant change in the types or significant increase in the amounts of any effluents released offsite. The accumulator isolation valves and associated breakers do not interface with any gaseous or liquid effluent processing systems.

- (iii) There is no significant increase in individual or cumulative occupational radiation exposure.

The proposed changes will not result in significant changes in the operation or configuration of the facility. There will be no change in the level of controls or methodology used for processing of radioactive effluents or handling of solid radioactive waste, nor will the proposal result in any change in the normal radiation levels within the plant. Therefore, there will be no significant increase in individual or cumulative occupational radiation exposure resulting from this change.