

SER NO: 01-172

CROSS REFERENCE: NL-99-082, Unit 1 and 2

DESCRIPTION OF CHANGE:

The proposed change is to revise plant procedures to manually position Diesel Generator OG501A through E intercooler temperature control valves TV-01124A through E In the full open (de-energized position).

SUMMARY:

- I. No. The proposed change will restore the Emergency Service Water (ESW) System and Diesel Generators to a configuration that is similar to their original design. Temperature control valves TV-01124A through E did not exist in the original plant design. It is concluded that temperature control valves TV-01124A through E are maintained operable, even though they are not needed to minimize tin smearing, as was originally thought. It is concluded that the proposed change of disabling the temperature control for TV-01124A-E will not prevent the diesel generators from performing their intended function, nor will it contribute to increasing the probability of a diesel failure during the short period these procedure changes will be in effect. The proposed change does not increase the consequences of an accident or malfunction. It is equivalent to the original design of the plant, in terms of intake air cooling. Therefore, the proposed change does not increase the probability of design basis accidents, radiological consequences of an accident, or failure modes of equipment important to safety.
- II. No. The proposed change does not introduce any new failure mechanism. Failure of a diesel generator has been previously evaluated. The design of the temperature control valve is to fail open. Therefore, this condition has been evaluated previously. Cooler intake air temperatures could lead to slightly more condensation being entrained in the inlet air carried into the cylinders. However, this situation is discussed in an NRC SER dated May 11, 1992, with the conclusion that condensation will not cause any significant lubrication oil film degradation or engine damage. In addition, failure of an ESW pump has been previously evaluated. The proposed change will not introduce a generic failure mode, nor will it adversely affect either the operability of the diesels or ability of the diesels to perform their safety function. Therefore, the proposed change does not create the possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. Technical Specification 3.7.2 addresses the Emergency Service Water System. This section is concerned with providing adequate ESW flow rate. Technical Specifications 3.8.1, 3.8.2, and 3.8.3 are applicable to the Diesel Generators. There is no discussion of either flow rates to the diesel intercoolers or ESW pump minimum flow rates in the Technical Specifications, although the individual pump flow rates are tested in the Station Pump and Valve Testing Program. The Bases for these Technical Specifications were also reviewed. Section 9.2.1 of the SER, NUREG-0776, which addresses ESW, was reviewed. Section 9.6.3.3 of the SER, which addresses diesel engine cooling water, was also reviewed. The proposed change does not affect

NUREG-0776. On May 11, 1992, the NRC issued an SER on the emergency diesel generator overpressurization events. The SER noted that an automatic inlet air temperature control system had been installed. This SER was also reviewed, as was NRC Information Notice 92-78. The proposed change does not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-173

CROSS REFERENCE: DCP 191048, 191053, Unit 1 and 2

DESCRIPTION OF CHANGE:

Currently, Core Spray (CS) and Residual Heat Removal (RHR) suction line drop is based on the assumption that the suction strainers attached to each suction line are 50 percent plugged. Upon implementation of DCPs 191048 (Unit 1) and 191053 (Unit 2), the entire surface area of both strainers will be assumed to pass flow through a debris bed. The implementation of DCPs 191048 and 191053 will result in changes to all appropriate design and licensing documentation to reflect these assumptions. There are no physical changes to plant systems or components that result from the implementation of DCPs 191048 and 191053.

SUMMARY:

- I. No. The proposed action does not directly or indirectly reduce the capability of any safety systems to perform their design basis functions to mitigate the effects of any accident previously evaluated in the SAR. There are no changes resulting from this modification that result in changes in the potential strainer debris sources, their potential to be destroyed by LOCA jet forces or the potential for debris to transport to the suppression pool and be filtered by the strainer.
- II. No. No new failure modes are introduced by the implementation of this modification. Neither physical components nor plant operation will be changed due to implementation of this modification. Therefore, this modification does not create the possibility of a malfunction of a different type than any previously evaluated in the SAR.
- III. No. There are no configuration or operational changes to CS or RHR resulting from the implementation of this modification that result in the reduction of the margin of safety as defined by the Bases of the Technical Specifications. Since implementation of the revised suction strainer design basis does not involve any physical plant changes, the margin of safety that exists between the potential strainer pressure drop that could result from LOCA (after debris transport and filtering by the strainers) and the point at which CS and RHR net positive suction head (NPSH) and flow requirements cannot be met is unchanged. Furthermore, the margin that exists between the available NPSH and required NPSH as described in the FSAR is not changed by this modification.

SER NO: 01-174

CROSS REFERENCE: DCP 98-3014B, Rev. 2, Unit 1 and 2

DESCRIPTION OF CHANGE:

The proposed action is to install a fire barrier upgrade system on selected raceways in Fire Areas R-1A, R-1B and CS-11.

SUMMARY:

- I. No. The proposed actions do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the SAR. The interfacing system evaluations assure the proposed action has no impact on equipment important to safety. The function of the circuits in the raceways affected by the proposed action does not change. The proposed action assures operability of the required Appendix R circuits and prevents inadvertent operation of equipment required during an Appendix R fire in Fire Zones 1-4A-N, 1-4A-S, 1-4A-W or 0-28A-I. Appendix R safe shutdown can be achieved and maintained for postulated fires in any plant area including Fire Zones 1-4A-N, 1-4A-S, 1-4A-W or 0-28A-I. The temporary removal of a section of Battery Room Exhaust System HVAC duct does not render Control Room Emergency Outside Air System (CREOASS) inoperable nor does it render inoperable any other Control Structure HVAC system listed in TRO 3.7.9.
- II. No. The proposed action did not identify a postulated initiating event which would create the possibility of an accident of a different type. The qualification and installation program compliance of the fire barrier system precludes the possibility of a malfunction of a different type. There were no new scenarios that could be postulated that would create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. The proposed action does not affect the operability requirements of any safety related system component as governed by Technical Specification or Technical Requirements Manual. The margin of safety as defined in the basis of the Technical Specification or Technical Requirements Manual is not reduced by the proposed action.

SER NO: 01-175

CROSS REFERENCE: NL-99-068, Unit 1 and 2

DESCRIPTION OF CHANGE:

This change resolves a discrepancy in the Bypass Indication System (BIS) between the FSAR and the as-built plant conditions. The FSAR indicates that the Emergency Core Cooling System (ECCS) Room Coolers will provide a signal to the Bypass Indication System when the cooler switch is placed in the STOP position. Based on criteria for the Bypass Indication System, this indication is not required.

SUMMARY:

- I. No. The proposed change does not increase the probability or the consequences of an accident as previously evaluated in the SAR. The ECCS and Reactor Core Isolation Cooling (RCIC) room coolers are not initiators of any accidents described in Chapters 6 or 15 of the FSAR. When the coolers are removed from service, the associated safety system loop is declared inoperable and the appropriate LCOs are in effect. The loss of one loop of an ECCS or RCIC safety system is previously addressed.

This proposed FSAR change does not increase the consequences of a malfunction of equipment important to safety as previously evaluated in the SAR. The consequences of an ECCS or RCIC pump room cooler are identified in FSAR Section 9.4.2.2. This analysis includes the loss of the room coolers. The proposed change to the FSAR will not physically change the plant, nor will it change the operation or maintenance of the components affected by the change. Should the proposed change result in the loss of an ECCS or RCIC room cooler, the plant is still within its design bases.

The proposed FSAR change does not increase the probability of a malfunction of equipment important to safety. The room cooler maintenance frequency will not change as a result of the FSAR change. When the coolers are removed from service to perform routine maintenance, the LCOs are entered for the associated safety systems. The appropriate LCOs are described in Technical Specification Section 3.5, Emergency Core Cooling Systems and Reactor Core Isolation Cooling System.

In NUREG 0776, compliance with Reg. Guide 1.47 is discussed in Section 7.1.3 and Section 7.3.1. The proposed change does not affect the conclusions in these sections. Section 7.1.3 addresses the manual initiation of bypass indication signals. This change has no impact to manually actuated bypass indication. Section 7.3.1 addresses the "lead-lag" design of the High Pressure Coolant Injection (HPCI) and RCIC room coolers. When a HPCI or RCIC room cooler is selected as the lead cooler and is switched "off", the room cooler in "lag" is rendered inoperable; however, when any HPCI or RCIC room cooler is removed from service for maintenance, the associated safety system is declared inoperable and the appropriate LCOs are entered. Therefore, the issue of the cooler being in the lead or lag position is not relevant to the operability of HPCI or RCIC.

- II. No. The failure mode and effects analysis for the ECCS and RCIC room coolers is identified in FSAR Section 9.4.2.2. This analysis includes the loss of ECCS and RCIC room coolers. The proposed change to the FSAR will not physically change the plant, nor will it change the operation or maintenance of the components affected by the change. Should the proposed change result in a bypassed condition going unnoticed and ultimately leading to the loss of an ECCS Room cooler, the plant is still within its design bases. The loss of the ECCS and RCIC room coolers is analyzed in FSAR Section 9.4.2.2.3. Therefore, the possibility of an accident or malfunction different than those described in the SAR is not created.
- III. No. The proposed change does not reduce the margin of safety as defined in the Tech Specs. The ECCS and RCIC room coolers are not included in any Tech Specs. The following Technical Specifications were reviewed: 3.3.5.1 Emergency Core Cooling System Instrumentation, 3.3.5.2 Reactor Core Isolation Cooling System Instrumentation, and 3.5 Emergency Core Cooling Systems and Reactor Core Isolation Cooling System.

SER NO: 01-176

CROSS REFERENCE: NL-99-075, Unit N/A

DESCRIPTION OF CHANGE:

Page 1 of 1 of Attachment B and Page 3 of 3 of Attachment C to ODCM-QA-008 are being changed to indicate the replacement of Radiological Environmental Monitoring Program (REMP) milk monitoring location 12B3 with location 7C1.

SUMMARY:

- I. No. No accident as described in the SAR could be caused, in whole or in part, or be exacerbated by this change to REMP monitoring locations; therefore, no increase in the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety can occur.
- II. No. No accidents of any type could be caused, in whole or in part, or be exacerbated by this change to REMP monitoring locations. Therefore, the proposed action will not create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. This change to REMP monitoring locations does not affect any physical parameters, instruments, response times, redundancy and/or independence of components. Therefore, no margin of safety as defined in the basis for any Technical Specification is reduced.

SER NO: 01-177

CROSS REFERENCE: NL-99-064, Unit N/A

DESCRIPTION OF CHANGE:

This Evaluation is written to change the TRM requirement for snubber initial sampling size from a fixed formula of 105 snubbers with 4 failures before expansion (21%) to a 10% initial sample with expansion after the first failure.

SUMMARY:

- I. No. The change in initial sample size for snubber functional testing in Unit 1 and Common will not increase the probability of occurrence of an accident or malfunction of equipment important to safety previously evaluated in the SAR.

Failure of a snubber does not fail the surveillance. The surveillance is complete when the required sample size is tested with no failures or the population is tested out and failed snubbers are replaced or repaired. From a historical perspective, the rate of snubber failures has been fairly consistent, averaging 5% over the last four refueling outages for both units. The rate of functional failures for Unit 1 and Common snubbers will not increase if the initial sampling size is changed to match the sampling size currently being used for Unit 2. The 5% failure rate seen in both Units should remain constant even after changing the number of the initial sample of functionally tested snubbers in Unit 1 and Common.

- II. No. The change being made is to go from a fixed number of tests to 10% of the snubbers for the initial sample size for snubber functional inspections. Also changing the expansion testing from starting after 4 failures to starting as soon as the first failure occurs. This change will not introduce any new mode of plant or system operation, or failure mechanisms of a different type than those failure mechanisms previously evaluated in the SAR. This is based on the fact that no physical changes are being made to the facility and that the only procedural change being made is to the number of snubbers being selected for the initial functional testing for Unit 1 and Common; the inspection/testing methodologies being employed remains unchanged. Therefore, new accident initiators or causes for equipment malfunction are not created.

- III. No. The changes being made have no impact on the margin of safety as defined in the basis for any Technical Specification. This conclusion is based on the fact that changing the initial sample size for functionally testing snubbers does not impact the operability of any Technical Specification requirement. The change of the initial sample size will not increase the possibility for misoperation of those components which have the potential to impact the operability of spurious operation of Technical Specification equipment.

SER NO: 01-178

CROSS REFERENCE: NL-99-047, Unit 1 and 2

DESCRIPTION OF CHANGE:

The action revises TRM Bases Sections B 3.11.2.1 and B 3.11.2.6 and provides clarification on the time that the iodine and particulate monitors can be out of service and still be considered to be in continuous operation. The time chosen is one hour since this time is a small fraction of the normal minimum analysis period.

SUMMARY:

- I. No. Since the vent monitoring system only performs a monitoring and alarm function and does not provide an actuation function or isolation function, the allowance to have sampling restored within one hour following the loss of sampling capability of the iodine and particulate monitors will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety.
- II. No. The vent monitoring system does not provide any actuation or isolation functions. It does not interface with systems that are used to mitigate the consequences of an accident. The vent monitoring system only provides alarm and indication. The failure of the vent monitoring system can not cause the failure of any plant vent. Therefore, allowing one hour to reestablish the sampling function during continuous discharge does not create the possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. TRO 3.11.2.1 and TRO 3.11.2.6 define that the sampling for iodine and particulates is required to be continuous. The minimum analysis frequency for either the iodine or particulate filters is 7 days. As defined in the Bases for TRO 3.11.2.1, a sampling channel required to be in continuous service will be considered to remain and have been in continuous service when its service is interrupted for a time period that is a small fraction of the minimum analysis period, or of the period covered by each dose rate calculation. Having the vent monitoring system out of service for one hour is approximately one-half of one percent of the total time of the analysis frequency. Therefore, this action does not reduce the margin of safety.

SER NO: 01-179

CROSS REFERENCE: NL-99-077, Units 1 and 2

DESCRIPTION OF CHANGE:

This evaluation determines that a post-weld surface examination and Initial Service Leak Test (ISLI) is an appropriate post-maintenance test. ANSI B31.1 makes allowances to substitute 100% radiography, ultrasonic, liquid penetrant, or magnetic particle examinations in lieu of hydrostatic tests. NRC agreed that surface NDE is an acceptable alternative to hydro-static testing of offgas system piping via a Safety Evaluation prepared by the Office of the NRR dated 6-22-93 in response to PLA-3546.

SUMMARY:

- I. No. The consequences of a Gaseous Radwaste System leak or failure are analyzed in FSAR Section 15.7.1. Those vents which could cause a gross failure in the offgas treatment system are: (1) A seismic occurrence greater than design basis, (2) A hydrogen explosion in housing unit, (3) A fire in the filter assemblies, and (4) Failure of spatially related equipment.

The seismic event is considered to be the most probable and most severe which the system is designed to prevent or accommodate. The seismic failure is the only conceivable event which could cause significant system damage. The equipment and piping are designed to contain any hydrogen-oxygen detonation which has a reasonable probability of occurring. A detonation is not considered as a possible failure mode.

Surface NDE is an acceptable alternative to hydro-static testing when hydro-static testing is not practical, therefore, there is no effect on the safety function of the affected components. The alternative testing provides adequate assurance that piping integrity will be maintained. The probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR will not increase.

- II. No. The proposed action does not change any of the inputs used for accidents analyzed in Chapter 15 of the FSAR. The proposed action assures that piping integrity is maintained. The possibility for an accident or malfunction of a different type than any evaluated previously in the SAR is not created,
- III. No. The proposed action assures that piping integrity is maintained. Technical Requirements 3.7.5.1 and 3.7.5.2 require monitoring of offgas hydrogen concentration and require that the concentration of hydrogen in the offgas piping being maintained less than 4% by volume during operation of the main condenser air ejector and offgas treatment system. The bases for the Technical Requirements were reviewed. It was concluded that the proposed action does not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-180

CROSS REFERENCE: DCP 200941, Unit 1

DESCRIPTION OF CHANGE:

This modification will replace the existing SS-5G solid state trip units with SS-4G devices for the following Non-1 E 480 Volt Load Center Circuit Breakers as a result of a 10CFR Part 21 electrical component deficiency identified by Asea Brown Bovril (ABB):

1B100-022	1B250-023
1B100-023	1B250-024
1B110-022	1B260-024
1B150-022	

SUMMARY:

- I. No. The proposed action does not affect the spectrum of postulated events for which transients or anticipated operational occurrences and accident conditions were analyzed. The proposed modification maintains the design basis operation of the above mentioned load centers. There is no increase in the probability of an accident, since load center function remains the same. There are no new safety concerns or conditions not already evaluated or discussed in Sections 6 and 15 of the FSAR. This modification does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.
- II. No. The proposed changes do not involve a postulated initiating event which would create the possibility of an accident of a different type. The proposed action will not affect any structure, system, or component in performing its safety function, because no electrical bus or logic interconnection with any safety-related equipment occurs. Since the load center circuit breaker basic function does not change as a result of this modification, this modification does not create a possibility for an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.
- III. No. The AC power supplies necessary to meet Technical Specification requirements are listed in Technical Specification Table 3.8.7-1. 480 VAC load centers 1B100, 1B110, 1B150, 1B250 and 1B260 are not listed as necessary, nor are they required for operation or shutdown of the unit or for mitigation of the consequences of an accident. In addition, no electrical bus or control logic connection to any Technical Specification related power supply is impacted. Therefore, the margin of safety is not reduced.

SER NO: 01-181

CROSS REFERENCE: NL-99-070, Unit 1 and 2

DESCRIPTION OF CHANGE:

Revise FSAR 6.1.1.1 to bring it into compliance with Reg. Guide 1.36 Rev. 1 regarding the use of phenolic insulation on carbon steel per technical specification M-1086.

SUMMARY:

- I. No. The change for requiring the phenolic insulation to meet Reg. Guide 1.36 Rev. 1 has been covered by Technical Specification M-1086. This is a more restrictive requirement. Therefore, the proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.
- II. No. The change for requiring the phenolic insulation to meet Reg. Guide 1.36 Rev. 1 has been covered by Technical Specification M-1086. This is a more restrictive requirement. Therefore, the proposed action does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. The change for requiring the phenolic insulation to meet Reg. Guide 1.36 Rev 1 has been covered by Technical Specification M-1086. This is a more restrictive requirement. Therefore, the proposed action does not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-182

CROSS REFERENCE: NL 99-079, Unit 2

DESCRIPTION OF CHANGE:

No change or action is proposed. The purpose of this evaluation is to demonstrate the acceptability of the operation of the instrument air system with the measured amounts of N-13 activity from an NRC I.E. Bulletin 80-10 standpoint.

SUMMARY:

- I. No. There is no increase in the probability of occurrence of an accident or malfunction of equipment important to safety because there are no system, procedure, or other actions or changes contemplated. Chemically, air containing N-13 behaves essentially the same as normal air (70% stable Nitrogen) which includes the properties of compression and condensation. Because of the short half life (~10 min) of N-13, the small concentrations found in instrument air and the turbine building, and regulatory guidance given in RG 1.109, the presence of the detected levels of N-13 is inconsequential from the standpoints of plant effluent and dose to the public.
- II. No. The possibility of an accident or malfunction of a different type than previously evaluated is not created because no physical plant changes or procedure changes are proposed. Additionally, the presence of N-13 in the concentrations found do not impact any plant equipment or affect the implementation of any plant procedures.
- III. No. The margin of safety is not reduced because no changes to plant practices or procedures are proposed; and, no substantive effects on the instrument air system or its operation have been identified. Under the analyzed accident conditions, N-13 does not increase the consequences of an accident because the dose to the public is several orders of magnitude below offsite dose limits, method of N-13 production is limited, and half life is short (<<8 days).

SER NO: 01-183

CROSS REFERENCE: DCP 98-3014A, Unit 1

DESCRIPTION OF CHANGE:

The proposed action is to install a fire barrier upgrade system on selected raceways in Fire Area R1A, R-1B and R-1A-1B.

SUMMARY:

- I. No. The proposed actions do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the SAR. The interfacing system evaluations assure the proposed action has no impact on equipment important to safety. The function of the circuits in the raceways affected by the proposed action does not change. The proposed action assures operability of the required Appendix R circuits and prevents inadvertent operation of equipment required during an Appendix R fire in Fire Zones 1-2B, 1-2D, 1-3A, 1-3B-N or 1-3B-W. Calculation demonstrates that the existing configuration in the vicinity of the cable tray sections listed above provides an equivalent level of assurance as those requirements of 10 CFR 50 Appendix R, Section III.G.2.b. Appendix R safe shutdown can be achieved and maintained for postulated fires in any plant area including Fire Zones 1-2B, 1-2D, 1-3A, 1-3B-N or 1-3B-W.
- II. No. The proposed action did not identify a postulated initiating event which would create the possibility of an accident of a different type. The qualification and installation program compliance of the fire barrier system precludes the possibility of a malfunction of a different type. There were no new scenarios that could be postulated that would create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. The proposed action does not affect the operability requirements of any safety related system component as governed by Technical Specification or Technical Requirements Manual. Acceptance of the existing configuration in the vicinity of cable tray sections FIKH15 and FIKL15 does not result in a change to the Technical Specifications. The margin of safety as defined in the basis of the Technical Specification or Technical Requirements Manual is not reduced by the proposed action.

SER NO: 01-184

CROSS REFERENCE: NL-99-074, Units 1 and 2

DESCRIPTION OF CHANGE:

Revise FSAR Sections 3.11.5.1 and 5.4.7.1.5 and Table 3.11-7 to be consistent with the established and current practices for controlling suppression pool water chemistry, flushing the shutdown cooling portions of the Residual Heat Removal (RHR) System to minimize impurity transport to the reactor coolant system, and minimizing corrosion during periods when the RHR system is not operating.

SUMMARY:

- I. No. The proposed revisions to the FSAR will not increase the probability or the consequences of an accident or malfunction of equipment important to safety. The proposed changes are either editorial or provide consistency with current plant practice. These practices achieve the intent of flushing the shutdown cooling portions of the RHR System to minimize the input of deleterious impurities to the reactor coolant system. Therefore, the probability of failure of the reactor coolant pressure boundary, core internals and the fuel cladding is not increased. The water chemistry specifications for the suppression pool are consistent with Regulatory requirements, General Electric specifications, industry guidelines and TRM 3.4.1. Safety-related systems and components exposed to this water chemistry have not experienced excessive rates of corrosion. Therefore, the probability of malfunctions of the Suppression Pool, RHR System and Emergency Core Cooling System (ECCS) systems due to corrosion and fouling is not increased.
- II. No. The proposed revisions to the FSAR will not create the possibility for an accident or malfunction of a different type. The proposed changes are either editorial or provide consistency with current plant practice. The design of plant systems is not being changed, and the chemistry specifications are consistent With regulatory requirements, vendor specifications, industry guidelines and TRM specifications.
- III. No. The proposed revisions to the FSAR will not reduce the margin of safety as defined in the bases for any Technical Specification. There are no SSES Technical Specifications for reactor coolant chemistry, suppression pool chemistry or on flushing of the shutdown cooling portions of the RHR System.

SER NO: 01-185

CROSS REFERENCE: DCPs 179502,179503,179504,179505,179506,179507,
179362, 202811, Units 1 and 2

DESCRIPTION OF CHANGE:

The proposed change replaces a total of eight (8) Control Room Turbine Supervisory Instrumentation Recorders, four in each unit.

SUMMARY:

- I. No. The proposed action does not affect any of the postulated initiating events for which transients or anticipated operational occurrences and accident conditions were analyzed (reference FSAR Chapter 7, Chapter 10 and Chapter 15). It does not create a condition that could propagate an accident. The proposed action does not involve a precursor of, or contribute to, any evaluated accidents involving offsite dose. This change does not adversely affect any safety-related plant systems or components. This change has no adverse effect on accident scenarios and does not increase the potential of a malfunction of equipment important to safety. These modifications will not increase challenges to safety systems assumed to function for any accident analysis. Therefore, this change has no effect on any accident scenario or malfunction of equipment important to safety, and has no effect on radiological consequences.

The proposed action does not affect the ability of Turbine Supervisory Instrumentation recorders to function. The proposed change will continue to allow operators to monitor and record all of the existing variables directly on the replacement recorders. In addition, the replacement recorders will continue to be powered from the existing 120VAC non-Class 1 E Vital AC Power Supply distribution panels. Therefore, the proposed change does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the SAR.

- II. No. The primary purpose of the Main Turbine Generator recorders is to display variables that provide information required by the control room operators for monitoring turbine startup/heatup/shutdown and power operation. This information supports the operator to monitor for degrading conditions and taking appropriate action to avoid loss of power generation or damage to the Main Turbine Generator.

The proposed modifications do not adversely impact the dynamic qualifications of the existing panels and do not adversely affect their power sources. A failure of the new recorders produces the same results as failure of the existing recorders. Therefore, the proposed change does not create the possibility of an accident or malfunction of a different type than any evaluated previously in the SAR.

- III. No. Technical Requirement 3.3.7, Main Turbine Overspeed Protection System, initiates Main Turbine trip functions. The basis for this Technical Requirement states that the system is provided to protect the Main Turbine. The proposed action has no impact on this Technical Requirement, since no circuit or equipment modifications adversely affect the associated instrumentation channels. Also, there is no impact to Technical Specifications,

3.7.6, Main Turbine Bypass System, and 3.8, Electrical Power Systems, from the proposed action. The changes do not affect the operational or surveillance requirements of any Technical Specifications or Technical Requirement mentioned above. The proposed action does not affect the margin of safety as delineated in the Technical Specifications or Technical Requirements above.

SER NO: 01-186

CROSS REFERENCE: NL-99-088, Unit N/A

DESCRIPTION OF CHANGE:

As part of the Current Licensing Basis (CLB) effort, it was determined that the centerline elevation of the blowdown line orifice is 674.75 feet rather than 676.9 feet. The changes made reflect this change as well as the resulting increased flow rates through the blowdown line.

SUMMARY:

- I. No. The FSAR revisions presented do not degrade the performance of any safety system or equipment important to safety assumed to function in any accident analysis nor does it increase the challenges to such systems or equipment. The changes are conservative because more water is released through the blowdown conduit than what was originally calculated, thereby resulting in slightly better water level control during flooding events.

There is no increase in the probability of occurrence of a malfunction of equipment important to safety. The changes made to the FSAR do not affect any of the accidents evaluated in FSAR Chapter 15. The revisions do not increase the probability of an occurrence of an accident evaluated previously in the SAR.

- II. No. The changes do not introduce any new failure mechanisms not considered in the accident analyses presented in the SAR. The FSAR revisions do not create a possibility for an accident or malfunction of a different type. The changes made to the FSAR reflect the actual inlet elevation of the blowdown line.
- III. No. The changes made to the FSAR provide a modest increase in the margin of safety associated with the release of water out of the spray pond during flooding events. The flow through the blowdown line is increased since there is additional head associated with the lower inlet elevation. The main release of flooding water via the emergency spillway is not affected by this change.

SER NO: 01-187

CROSS REFERENCE: NL-99-084, Units 1 and 2

DESCRIPTION OF CHANGE:

011023A&B E Diesel Generator (DG) Emergency Service Water (ESW) Supply Isolation Valves are to be excavated and used to isolate ESW to the 'E' Diesel Generator Building.

SUMMARY:

- I. No. 011023A&B E DG ESW Supply Isolation Valves will remain protected from natural phenomena. The geometry of the manhole makes the probability of a tornado generated missile impacting the valve negligible. The support that is provided to the yoke and the inaccessibility of pressure retaining components makes any damage from an impact unlikely to cause a rupture of the ESW Supply Header. Should the valves fail to open once closed, the station will still have four operable diesel generators as required by Technical Specification 3.8.1. The Emergency Service Water System would remain operable since no other system flowpath is effected. Therefore, no safety functions would be lost.
- II. No. The excavation of 011023A&B E DG ESW Supply Isolation Valves does not increase the probability of a malfunction in a single loop of ESW due to the low probability of an impact by a tornado-generated missile. Therefore, it does not create the possibility of a dual malfunction causing the loss of both ESW Supply Headers.
- III. No. Technical Specification 3.7.2 (ESW) and 3.8.1 (AC Sources - Operating) apply and will be met while excavating 011023A&B E DG ESW Supply Isolation Valves. The excavation has the potential to effect only the 'E' Diesel Generator leaving four diesel generators required by Technical Specification 3.8.1. The excavation will not degrade the ESW supply headers, leaving both ESW subsystems operable as required by Technical Specification 3.7.2.

SER NO: 01-188

CROSS REFERENCE: NL-99-071, Units 1 and 2

DESCRIPTION OF CHANGE:

This evaluation addresses the use and storage of the fuel rod storage basket in the spent fuel storage pool. Currently, the storage basket is in the fuel pool and is not addressed in the SAR.

SUMMARY:

- I. No. The use of the fuel rod storage basket in the fuel pool does not impact any equipment important to safety, as previously evaluated in the SAR. All of the equipment that the storage basket will interface with, such as the fuel pool racks, refueling platform, fuel grapple, and the fuel prep machine, can safely support the storage basket as the storage basket weighs less than a fuel assembly and the physical dimensions of the storage basket are similar to a fuel assembly. For the same reasons, the drop of the storage basket from a radiological viewpoint is less severe than a fuel and equipment handling accident. The fuel and equipment handling accidents also bound the drop of a discharged channeled fuel assembly, grapple, and mast sections; or piece of equipment onto the storage basket as the storage basket contains fewer fuel rods. Therefore, the fuel rod storage basket will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR. FSAR Chapters 9.1 and 15.7.4 were reviewed to reach this conclusion.
- II. No. The safety-related function of the fuel rod storage basket is to support the fuel rods in the basket. Because the storage basket provides adequate cooling for the rods and spacing to maintain sub-criticality, the storage basket can safely support the fuel rods. In the event that the storage basket drops within the fuel pool, the refueling accident bounds the radiological consequences as the storage basket weighs less and contains less fissionable material than a fuel assembly. Therefore, the fuel rod storage basket does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR. FSAR Table 3.7b-2 and 15.7.4 were reviewed to reach this conclusion.
- III. No. The fuel rod storage basket does not prevent any system important to safety from performing its safety function. Therefore, the fuel rod storage basket cannot reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-189

CROSS REFERENCE: DCP 210348, Unit 1

DESCRIPTION OF CHANGE:

This modification will reduce the probability of inadvertent hoist overspeed tripping by replacing the hoist speed sensing equipment with a new electronic overspeed sensing assembly.

SUMMARY:

- I. No. Based upon a review of the FSAR (Sections 1.2, 3.1, 3.5, 9.1.5, 9.1.2, 9.1.4, 15.7.5, Table 9.1.6a, Questions 010.5, 010.25, 423.12, 423.43, 423.49), the SSES SER (and its supplements, specifically Supplements 1 & 6), the Offsite Dose Calculation Manual (ODCM), and the FPRR, the only accident that could be applicable is the "SPENT FUEL CASK DROP ACCIDENT". Based upon this modification and review of the above SAR documents, no new interfaces with equipment important to safety have been identified, nor are existing ones adversely affected. Also, the structural portions of the crane bridge and trolley are not adversely impacted by this modification, since all attachments will be seismically qualified. Its use to transport objects while avoiding the fuel pool is not adversely impacted since none of the controls used to prevent this are adversely impacted by this modification. Finally, the transfer of new fuel assemblies between the railroad/truck bay is not adversely affected since no design parameters are changed as a result of this modification. The consequences of an accident could have been potentially increased if there were adverse impacts to the safety-related function of the Reactor Building and/or Control Structure. However, there are no adverse impacts for the reasons stated above. Therefore, the proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.
- II. No. None of the design criteria of the crane are adversely affected, there are no adverse impacts to existing interfaces with equipment, and there are no new failure modes created nor existing ones changed as a result of this modification. Therefore this modification will not create the possibility for an accident of a different type as evaluated previously in the SAR.
- III. No. The Unit I Technical Specifications (and Bases) and Technical Requirements Manual (TRM) have been reviewed with reference to this modification. The TRM sections judged to apply are 3.12.1 through 3.12.3. Since this modification changes no design parameters (therefore none that relate to these TRM sections), this modification does not reduce the margin of safety as defined in the bases for any Technical Specification.

SER NO: 01-190

CROSS REFERENCE: DCPs 203897, 203898, Units 1 and 2

DESCRIPTION OF CHANGE:

Modification 203897 replaces TRSH-15316, Fuel Pool Cooling Recorder, Unit 1 and modification 203898 replaces TRSH-25316, Fuel Pool Cooling Recorder, Unit 2.

SUMMARY:

- I. No. The primary purpose of the Fuel Pool Cooling recorders is to display variables that provide trend information required by the Nuclear System Engineer for Fuel Pool Heat Exchanger (HX) A, B, C, outlet temperature and Fuel Pool HX common inlet temperature. In addition, the new recorder will continue to provide a common alarm output to alarm window 2-1 in panel 1/2C206. The proposed action does not reduce or degrade the existing redundancy or diversity of indication or recording capability. Failure of a recorder is not an initiating event for which transients or anticipated operational occurrences were analyzed. This proposed change will not degrade a fission product barrier and will not impact any isolation valve. It does not degrade any engineered safety feature nor create a new radioactive material leakage path. Chapters 7 and 15 of the FSAR, and the current cycle-specific reload report, were reviewed for radiological effects of postulated accidents previously evaluated that release activity to the environment. Therefore, the proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.
- II. No. Chapters 7 and 15 of the FSAR and other Licensing documents were reviewed to determine if the proposed action has the potential of creating an unanalyzed event. The proposed action does not affect the ability of any of the recorders to perform their monitoring function in support of Fuel Pool Cooling operation. The existing non-Class 1E Instrument AC power supplies will be used. Electrical separation is maintained in accordance with PPL specification and FSAR Chapter 8.3.1.11.4. The proposed action complies with fire protection requirements of 10CFR50, Appendix R. Failure of a recorder is not an initiating event for which transients or anticipated operational occurrences were analyzed. The new recorders are programmable digital devices that process and display data for the specific variable(s) that they monitor. A new potential failure mechanism must be considered as a result of these modifications. That mechanism is failure of the software employed by the microprocessor in the new recorders. Microprocessor technology is not specifically evaluated by the SAR. However, a microprocessor/software failure would result in the failure of the associated recorder. Failure of the software could cause erratic indication and erratic alarms from the recorders; however, the resultant functional failure is no different than failures of the existing instruments. The proposed change does not impact any equipment important to safety. Therefore, the proposed action does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.

- III. No. Technical Requirement 3.9, Refueling Operations, and Technical Specifications 3.8, Electrical Power Systems, and 3.9, Refueling Operations, were reviewed and determined to be not impacted. Fuel Pool Cooling temperatures are not included in these documents. The changes do not affect the operational or surveillance requirements of any Technical Specifications or Technical Requirement mentioned above. The proposed action does not affect the margin of safety as delineated in the Technical Specifications or Technical Requirements above.

SER NO: 01-191

CROSS REFERENCE: DCP 98-3015B, Unit N/A

DESCRIPTION OF CHANGE:

The proposed action is to install a fire barrier upgrade system on the raceways in Fire Zone 0-27C within Fire Area CS-10, Fire Zone 0-27A within Fire Area CS-31, Fire Zone 0-27B within Fire Area CS-32 and Fire Zone 0-27E within Fire Area CS-33.

SUMMARY:

- I. No. The proposed actions do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the SAR. The interfacing system evaluations assure the proposed action has no impact on equipment important to safety. The function of the circuits in the raceways affected by the proposed action does not change. The proposed action assures operability of the required Appendix R circuits and prevents inadvertent operation of equipment required during an Appendix R fire in Fire Zones 0-27A, 0-27B, 0-27C or 0-27E. Appendix R safe shutdown can be achieved and maintained for postulated fires in any plant area including Fire Zones 0-27A, 0-27B, 0-27C or 0-27E.
- II. No. The proposed action did not identify a postulated initiating event which would create the possibility of an accident of a different type. The qualification and installation program compliance of the fire barrier system precludes the possibility of a malfunction of a different type. There were no new scenarios that could be postulated that would create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. The operability of the fire barrier system on the raceways listed is governed by the Technical Requirements Manual (TRM) Section 3.7.3.7 entitled "Fire Rated Assemblies" which is part of the SAR. The basis for operability of the fire barrier system is to assure operability of the circuits contained within the raceway during an Appendix R fire. The proposed action does not reduce the margin of safety associated with the fire barrier system.

The operability of the Control Structure HVAC System is governed by the Technical Requirements (TRM) Section 3.7.9 entitled "Control Structure HVAC" which is part of the SAR. The basis for operability of the Control Structure HVAC System is to maintain the room design temperature and design pressure within limits. The temporary duct removal does not adversely affect the ability of the Control Structure HVAC System to perform these functions and therefore, does not reduce the margin of safety associated with the Control Structure HVAC System.

The proposed action does not affect the Technical Specification so there is no change in the margin of safety defined in the basis for any Technical Specification.

SER NO: 01-192

CROSS REFERENCE: DCP 98-3013C, Unit 2

DESCRIPTION OF CHANGE:

The proposed action is to install a fire barrier upgrade system on selected raceways in Fire Areas R-2A, R-2B, R-2A-2B and R-2D.

SUMMARY:

- I. No. The proposed actions do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the SAR. The interfacing system evaluations assure the proposed action has no impact on equipment important to safety. The function of the circuits in the raceways affected by the proposed action does not change. The proposed action assures operability of the required Appendix R circuits and prevents inadvertent operation of equipment required during an Appendix R fire in Fire Zones 2-4A-W, 2-5A-N, 2-5A-S, 2-5A-W, 2-5B, 2-5C or 2-6A. Calculations demonstrate that additional compensating factors permit the installation of one hour rated fire barriers which provides an equivalent level of assurance as those requirements of 10 CFR 50 Appendix R, Section III.G. Appendix R safe shutdown can be achieved and maintained for postulated fires in any plant area including Fire Zones 2-5C, 2-5A-N (Stairwell 214) and 2-6A.
- II. No. The proposed action did not identify a postulated initiating event which would create the possibility of an accident of a different type. The qualification and installation program compliance of the fire barrier system precludes the possibility of a malfunction of a different type. There were no new scenarios that could be postulated that would create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. The proposed action does not affect the operability requirements of any safety related system component as governed by Technical Specification or Technical Requirements Manual. Acceptance of one hour fire barriers in Fire Zones 2-5C, 2-5A-N (Stairwell 214) and 2-6A does not result in a change to the Technical Specifications. The margin of safety as defined in the basis of the Technical Specification or Technical Requirements Manual is not reduced by the proposed action.

SER NO: 01-193

CROSS REFERENCE: DCP 185962, Units 1 and 2

DESCRIPTION OF CHANGE:

This change replaces the Reactor Water Cleanup (RWCU) Pump Purge skids with a purge supply from the Control Rod Drive Hydraulic System (CRDHS).

SUMMARY:

- I. No. The modifications do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety. The RWCU Pump Purge Supply System failure is not an analyzed accident. The equipment replaced by the modifications is not safety-related, and is outside the Reactor Coolant Pressure Boundary (RCPB). The failure of the purge supply system does not cause a failure of the RWCU pumps or the RWCU System pressure boundary. The probability of leakage from the primary system through the CRD System is not increased since an additional failure of the Hydraulic Control Unit (HCU) check valve must occur, as is the case today. The RWCU Pump Purge Supply System does not affect any of the safety-related components in the RWCU System or the CRDHS. The modifications do not affect the steam leak detection system in the RWCU equipment room, or the RWCU outboard isolation valves, nor do they increase the consequences of a malfunction of this equipment. The operation, performance and reliability of the CRD System is not adversely affected, since the additional flow of approximately 2.46 gpm is a negligible increase over the current design flow rate of 93 gpm. Further, a review of the CRD pump curve revealed that the required CRD delivery pressure can be maintained at the higher flow rate. The water quality of the purge supply is the same and does not affect reactor coolant chemistry limits. FSAR Sections 4.6, 5.2.5, 5.4.8, 15.4, 15.7 and 15.8 were reviewed.
- II. No. The modifications do not create a possibility of an accident or malfunction of a different type than any evaluated previously in the SAR. The modifications replace the RWCU Pump Purge Supply skid with a more reliable purge supply system. The purge flow rate is controlled by the same type valve that is currently being used. There are no new functions or operating modes added. The CRIDHS has already been analyzed for a leak in the area where the purge water supply will be connected. FSAR Sections 4.6, 5.2.5, 5.4.8, 15.4, 15.7 and 15.8 were reviewed.
- III. No. Based on a review of the Technical Specifications and the Technical Requirements Manuals the modifications do not reduce the margin of safety as defined in the basis of the Technical Specifications and the Technical Requirements Manuals. The RWCU Pump Purge Supply System does not affect any of the safety-related components in the RWCU System or the CRDHS. Technical Specifications bases B3.6.1.3 Primary Containment Isolation Valves (PCIVs) and B3.1 Reactivity Control Systems were reviewed. Technical Requirements Manuals Sections 3.1 Reactivity Control, 3.3.6 TRM Isolation Actuation Instrumentation and 3.4.1 Reactor Coolant System Chemistry were reviewed.

SER NO: 01-194

CROSS REFERENCE: NL-99-094, Unit 2

DESCRIPTION OF CHANGE:

Test procedure TP-264-029 was therefore developed to allow for the start/restart of the Unit 2A reactor recirc pump with the 2F032A bypass valve closed.

SUMMARY:

- I. No. The proposed test procedure represents an incremental difference from current operating practices and does not impose any additional stresses on the recirc system components (including the pump and the 2F031 A & 2F032A valves), and reactor coolant pressure boundary. The test does not affect the recirc pump's safety related end of cycle (EOC) trip function, and it does not impact any other plant or outside systems which would initiate any of the postulated events. Hence, the proposed test does not increase the probability of occurrence of a recirc system failure or an event requiring a recirc system component to respond.

All licensing and administrative requirements for the startup of an idle recirc pump will be in effect during the conduct of the proposed test. Furthermore, the initial conditions for postulated transients & accidents which are postulated in the FSAR bound those which will exist during the proposed test procedure. Therefore, the implementation of the proposed test procedure does not increase the consequences of these transients/accidents. Furthermore, since a bounding abnormal pump start-up scenario has previously been reviewed by the NRC, the implementation of the proposed test procedure does not constitute an unreviewed safety question (USQ).

- II. No. Numerous accidents and malfunctions are postulated in the FSAR, which involve recirc flow deviations, both increasing and decreasing. This group of events includes an abnormal pump start-up of a recirc pump, which is a bounding event for the proposed evolution. Considering the wide range of accidents and recirc system malfunctions postulated in the FSAR, all possible outcomes of a recirc pump startup transient are addressed. Thus, the proposed test will not introduce the possibility of any new accident or transient, beyond those which are already enveloped by the FSAR.
- III. No. A recirc pump protective trip (due to no discharge flow-path) will be temporarily bypassed for the 2P401A recirc pump during the proposed test procedure. However, this function is an equipment protective trip and is not related to safety or the SSES Technical Specifications. The remainder of the recirc 2P401A pump control circuitry remains unaffected. Since all existing Technical Specification and administrative requirements will be in effect during the conduct of the test the margin of safety defined in the bases of the SSES Technical Specification requirements will be maintained.

SER NO: 01-195

CROSS REFERENCE: NL-99-096, Unit N/A

DESCRIPTION OF CHANGE:

This change installs a temporary patch with the appropriate design pressure and temperature for the piping service that will allow the Waste Sludge Phase Separator (WSPS) to be returned to service so backwashing of the Unit 1 Condensate Filtration System (CFS) filters can commence.

SUMMARY:

- I. No. The only failure that could be postulated as a result of this bypass would be failure of the temporary patch resulting in release of the contents of the WSPS. FSAR 15.7.3 Postulated Radioactive Releases Due to Liquid Radwaste Tank Failure addresses "complete release of the radioactive inventory in a liquid containing waste tank with the largest quantity of volatile radionuclides in the Radioactive Waste Management Systems. This component is the Reactor Water Cleanup (RWCU) phase separator tank located in the radwaste enclosure." The temporary patch on the WSPS recirculation line can not affect the RWCU phase separator failure analysis therefore does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.
- II. No. The only failure that could be postulated as a result of this bypass would be failure of the temporary patch resulting in release of the contents of the WSPS. The WSPS is also in the radwaste enclosure on the same elevation as the RWCU phase separators. Failure of the WSPS would not create an accident or malfunction of a different type. Failure of the WSPS is possible presently without the temporary patch; therefore, the possibility for an accident or malfunction of a different type does not exist.
- III. There are no Technical Specifications that relate to Solid Radwaste System operation. TRM 3.11 Radioactive Effluents was reviewed. Specifically the following were reviewed: 1.) TRM 3.11.1 Liquid Effluents concerning effluents concentrations and associated dose. 2.) TRM 3.11.3 Total Dose concerning dose to an individual of the general public, and 3.) TRM 3.7.4 Solid Radwaste System concerning processing and packaging of radioactive wastes for offsite shipment per the Process Control Program. Since radwaste tank failure is bounded by the accident analysis as described in FSAR 15.7.3, the margin of safety as described in the basis for TRM 3.11.1 and 3.11.3 is not reduced. The proposed action does not affect the processing and packaging of radioactive wastes; therefore, the margin of safety as described in the basis for TRM 3.7.4 is not reduced.

SER NO: 01-196

CROSS REFERENCE: DCP 204914/204917/208986, Unit 1 and 2

DESCRIPTION OF CHANGE:

The proposed changes increase Technical Specification related stroke time margins and ensure secondary containment isolation damper fail-safe operation.

SUMMARY:

- I. No. The proposed action does not affect the spectrum of postulated events for which transients or anticipated operational occurrences and accident conditions were analyzed. The proposed modification maintains operability of the Reactor Building Ventilation System as referenced in FSAR Section 9.4.2 and the Instrument Air System stated in FSAR Section 9.3. 1.1. Based upon FSAR Section 15.7.4.2.3 - System Operation, credit is taken for the isolation of the normal ventilation system during a fuel or equipment handling accident. This design basis remains the same. There are no new safety concerns or conditions not already evaluated or discussed in Sections 6 and 15 of the FSAR. This modification does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.
- II. No. The proposed changes do not involve a postulated initiating event which would create the possibility of an accident of a different type. The proposed action will not affect any structure, system, or component in performing its safety function. The safety function of the secondary containment isolation dampers is to isolate on receiving a Hi-radiation or LOCA signal. The fail safe design feature that closes a damper upon loss of air remains the same. Since this basic function will not change as a result of this modification, this modification does not create a possibility for an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.
- III. No. The proposed action, in part, installs quick exhaust type solenoid valves and larger sized instrument tubing to reduce the damper closure times so as to meet Technical Specification Table B3.6.4.2-1 stroke times. This maintains the health and safety of the public because damper closure within the specified stroke times has no dose consequences. The proposed modification will not change the function of the safety related power distribution system as delegated by Technical Specification Bases B3.8.1, B3.8.2, B3.8.4, B3.8.5, B3.8.7, and B3.8.8. No degradation to any safety related power supply or power distribution circuit occurs. The proposed action does not create any new failure modes and maintains the margin of safety as delineated in the Technical Specifications. Fail-safe operation of the secondary containment isolation dampers is maintained. Therefore, the margin of safety is not reduced.

SER NO: 01-197

CROSS REFERENCE: NL-99-073, Units 1 and 2

DESCRIPTION OF CHANGE:

To support Unit 1 or Unit 2 plant operation, Unit 1 door number 511 (Unit 2 door 510) will be opened, connecting the Reactor Water Cleanup (RWCU) pump rooms with the general circulation space on 749' elevation of the Unit 1 (2) reactor building. Door 511 (510) is expected to be propped open during normal plant operation (Modes 1, 2 or 3).

SUMMARY:

- I. No. Opening of door 511 (510) does not increase the probability of occurrence or the consequences of an accident or the malfunction of equipment important to safety, as previously evaluated in the SAR. The door is not specifically noted as required by any FSAR analysis. FSAR Chapters 3, 6, 9 12, and 15 and NUREG 0776 were reviewed to determine if the proposed action has an effect on the spectrum of postulated initiating events for which transients or operational occurrences and accident conditions were analyzed. The door does not form part of an Appendix R credited fire boundary and is not credited for mitigation of any design basis event.
- II. No. The proposed modification does not create an accident or malfunction of a different type than any evaluated previously in the SAR. Door 511 (510) creates a boundary between the RWCU rooms and the open circulation area on elevation 749' of the Unit 1 (Unit 2) reactor building. The door is assumed closed for design basis calculations of environmental conditions, flooding, missiles, fire, etc. With the door open the potential exists for different consequences (i.e. slightly higher temperatures) from transients but the open door will not initiate a new accident or cause a different malfunction. Review of all potential barrier functions shows that existing design contains sufficient conservatism such that the door may be propped open without impacting the ability to achieve safe shutdown. Based on the above discussion, the proposed door opening does not create an accident or a malfunction of a different type than previously evaluated in the SAR.
- III. No. RWCU door opening affects no Technical Specifications and does not reduce the margin of safety as defined in the bases of any Technical Specification. The door is not a fire door, nor is it required to maintain adequate reactor building environmental conditions. The basis for Section 3.6.4.1 "Secondary Containment" was reviewed. The RWCU rooms and the circulation area of 749' of the reactor building are both in ventilation Zone 1 (11). Opening of the door does not affect the ability to maintain reactor building required vacuum, and does not disable Steam Leak Detection (SLD) (Section 3.3.6.1, "Primary Containment Isolation Instrumentation"). Procedures assure compliance with Technical Specification Section 5.7, which requires administrative controls of high radiation area barriers. Opening of door 511 (510) will not reduce the margin of safety as defined in the bases section of the Technical Specifications.

SER NO: 01-198

CROSS REFERENCE: NL-99-060, Unit N/A

DESCRIPTION OF CHANGE:

The proposed action is to revise the approval authority for plant functional unit procedures that do not require a 10 CFR 50.59 Safety Evaluation, from the General Manager - SSES to the responsible Manager or Supervisor.

SUMMARY:

- I. No. No plant components are affected by this change. The proposed action is an administrative change to the procedure program. Therefore, there is no Increase in the probability of occurrence or the consequences of an accident or malfunction of equipment as previously evaluated in the SAR.
- II. No. No plant components are affected by this change, The proposed action is an administrative change to the procedure program. Therefore, there is not a possibility to create an accident or malfunction of a different type than previously evaluated in the SAR.
- III. No. Technical Specification 5.4 "Procedures", TRM 4.4 "Procedures and Programs", and FSAR 13.4 "Review and Audit" require procedural control for certain activities performed by the Nuclear Department. These controls are not being reduced by the proposed change. All functional unit procedures and procedure changes will still receive a technical review, Quality Assurance Designated Reviewer (QADR) review, cross discipline reviews, and a Plant Operations Review Committee review when required. Only the final approval authority is being changed. Therefore, the margin of safety with regards to procedure control is not being reduced by the proposed change.

SER NO: 01-199

CROSS REFERENCE: NL-99-057, Units 1 and 2

DESCRIPTION OF CHANGE:

This change incorporates TSI-1/2-88-004 Rev. 5 into the Technical Requirement Manual (TRM) using the guidance presented in the Engineered Safeguard Service Water (ESSW) Pumphouse HVAC design calculation to ensure that no safety related equipment will fail due to environmental conditions inside the structure.

SUMMARY:

- I. No. The proposed TRM section does not increase the probability of occurrence or the consequences of an accident or the malfunction of equipment important to safety, as previously evaluated in the SAR. The proposed TRM section will require the ESSW Pumphouse ventilation system to be operated within the bounds of the FSAR analysis. FSAR Chapters 3, 6, 9, 12, and 15 and NUREG 0776 were reviewed to determine if the proposed TRM Section has an effect on the spectrum of postulated initiating events for which transients or operational occurrences and accident conditions were analyzed. NUREG 0776 and FSAR Section 9 provide a description of the expected operation of the ESSW Pumphouse Ventilation system. The proposed TRM section will operate the system within the limits stated in the above documents.
- II. No. The proposed TRM section does not create the possibility for an accident or malfunction of a different type than any previously described in the SAR. This conclusion was reached after examination of FSAR Sections 9.2 and 9.4. Examination of the FSAR determined that the proposed TRM section operates the ESSW Pumphouse ventilation system in a manner consistent with that described in the FSAR. The FSAR describes that the system is designed to prevent equipment freezing by designing the intake and exhaust dampers to fail closed. The proposed TRM section assures that if a fan/damper system fails, the freeze protection will be maintained. The proposed TRM surveillance requirement confirms the FSAR statement for this system that the fans will start on a pump start. Since the proposed TRM section is consistent with the FSAR and the current HVAC design analysis, the environment in the pumphouse will remain within the equipment operability limits established. As such, the equipment in the ESSW Pumphouse will be able to perform its design basis function.
- III. No. The proposed TRM section affects no Technical Specifications and does not reduce the margin of safety as defined in the bases of any Technical Specifications. Technical Specification Section 3.7.1 "RHRSW and UHS" and Section 3.7.2. "ESW System" received additional focus. The proposed TRM section is consistent with these sections and will actually provide additional assurance that the systems will be available to perform their design basis function. Based on the above information, it was determined that the new proposed TRM section will not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-200

CROSS REFERENCE: 95-9036, 95-9037, Units 1 and 2

DESCRIPTION OF CHANGE:

The proposed action is to replace the existing Condensate Demineralizer Flow recorders, flow computers and rate indicators with digital indicators that provide rate and totalized flow Indication.

SUMMARY:

- I. No. There are no applicable accidents for the Condensate Cleanup System, based on a review of the applicable portions of the SAR. The Condensate Cleanup System has no safety-related function and is not required to be operable following a LOCA. Failure of the system does not compromise any safety-related system or component or prevent a safe shutdown of the plant. In the post modification configuration, the condensate demineralizer flow rates will be indicated at local control panel 1C121 in lieu of being recorded. Based upon a review of the FSAR (Section 12.2) and the Offsite Dose Calculation Manual (ODCM) in reference to the proposed modification, there are no new radiological pathways created, and no radiological increase from existing pathways as a result of a malfunction of equipment. The Installation will be performed in accordance with approved procedures and electrical separation will be maintained. Failure of the system does not compromise any safety-related system or component or prevent a safe shutdown of the plant. Therefore, the proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.
- II. No. There are no adverse impacts to existing interfaces with equipment as it relates to the replacement of the existing recorders, flow computers and rate indicators with digital Indicators that provide rate and totalized flow indication. There are no new failure modes created nor existing ones changed as a result of this modification based upon a review of the design and of the FSAR. Therefore, the proposed action does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. The Technical Requirements Manual and Technical Specifications were reviewed and determined to be not impacted. The Condensate Demineralizers, as a support system to the Condensate Cleanup System, are not included in these documents. The changes do not affect the operational or surveillance requirements of any Technical Specifications or Technical Requirements. The proposed action does not affect the margin of safety as delineated in the Technical Specifications or Technical Requirements.

SER NO: 01-201

CROSS REFERENCE: NL-99-095, Unit 1 and 2

DESCRIPTION OF CHANGE:

The proposed action is a change in system operating procedures as a compensatory action for the condition where the Traversing Incore Probe (TIP) Guide Tube primary containment penetration isolation function does not meet the licensing or design basis.

SUMMARY:

- I. No. The proposed action increases the reliability of the TIP Guide Tube primary containment isolation barrier integrity. By removing the Ball Valve solenoid coil actuating power, the probability is reduced that the Ball Valve will fail to remain closed under accident conditions, as the FSAR assumed would occur. Restoration of this power under administrative controls places the plant and the TIP system in the condition analyzed in the FSAR (§6.2.4.3.3.10) and as accepted in the plant license SER (NUREG-0776 §6.2.6). The probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR is unaffected by the proposed action.
- II. No. The proposed action increases the reliability of the TIP Guide Tube primary containment isolation barrier integrity, effectively eliminating a malfunction not evaluated in the SAR. By removing the Ball Valve solenoid coil actuating power, the probability is reduced that the Ball Valve will fail to remain closed under accident conditions, as the FSAR assumed would occur. Restoration of this power under administrative controls places the plant and the TIP system in the condition analyzed in the FSAR (§6.2.4.3.3.10) and as accepted in the plant license SER (NUREG-0776 §6.2.6). No accident or malfunction of a different type than any evaluated previously in the SAR is created by the proposed action.
- III. No. The proposed action increases the reliability of the TIP Guide Tube primary containment isolation barrier integrity. By removing the Ball Valve solenoid coil actuating power, the probability is reduced that the Ball Valve will fail to remain closed under accident conditions, as the FSAR assumed would occur. Restoration of this power under administrative controls places the plant and the TIP system in the condition analyzed in the FSAR (§6.2.4.3.3.10) and as accepted in the plant license SER (NUREG-0776 §6.2.6). The margin of safety for the protection of the primary containment pressure boundary, is unaffected, or may be enhanced, by the proposed action.

SER NO: 01-202

CROSS REFERENCE: DCP 221598, Unit 2

DESCRIPTION OF CHANGE:

This modification replaces a socket welded elbow, changes weld profiles, and adds a new pipe support on the Unit 2 "A" Reactor Recirculation pump seal water drain to reduce the potential for weld failure due to high vibration.

SUMMARY:

- I. No. Based upon a review of the SAR (including FSAR Sections 3.9, 12.2, 15 & ODCM), the initiating event which includes the components affected by this modification is the recirculation pump shaft break and a small break LOCA. The probability of these events occurring is not increased because these modifications do not change the interface between the recirculation motor stand and the shaft. The failure probability of the affected piping is decreased because the support added reduces the probability of pipe cracking due to vibration, while not increasing the probability of pipe cracking due to other failure mechanisms. The support capability of the motor stand to which the new pipe support is mounted is not degraded as a result of this modification based upon location of the bolts and input provided by the pump vendor. The affected components interface with the drywell and the recirculation pumps, which perform safety-related functions. The probability of a malfunction of this equipment is not increased because their interface is not affected and there is no change in the fluid properties within the piping which would result in an increase in the rate of drywell leakage. There are no new radiological pathways created and no radiological increase from existing pathways caused by this modification, as a result of an accident or a malfunction of equipment
- II. No. The possible failure modes of the modified piping and motor stand were evaluated for new impacts upon plant equipment and previously evaluated initiating events (evaluated in the SAR). No new impacts were identified. The modified system configuration shall conform to the applicable construction Codes and Standards. The interfaces with equipment important to safety are unaffected by this modification since no new impacts were identified. Therefore, this modification will not result in an accident or malfunction of a different type being created for equipment important to safety.
- III. No. Based upon a review of the design parameters involved with this modification, none which serve as the basis for a margin of safety, as presented in the SSES Technical Specifications, are adversely affected by the modifications. Therefore, this modification does not reduce any margin of safety which serves as the basis for any Technical Specification or Technical Requirement.

SER NO: 01-203

CROSS REFERENCE: NL-99-087, Units 1 and 2

DESCRIPTION OF CHANGE:

This change revises the FSAR Secondary Containment Bypass Leakage (SCBL) evaluation of the Nitrogen Supply line to the drywell and wetwell to permit use of this line for containment inerting while the unit is in operating modes 1, 2 or 3.

SUMMARY:

- I. No. The proposed action is associated with mitigating or limiting the consequences of an accident previously evaluated in the SAR. Consequently, the changes affect conditions following an accident and therefore, do not increase the possibility for an accident or malfunction as evaluated in FSAR Chapters 6 or 15. Since the changes are associated with eliminating or limiting SCBL leakage from primary containment following a Design Basis LOCA, they are not associated with any conditions evaluated in FSAR Chapter 11.

The proposed action does not increase the consequences of an accident previously evaluated in Chapter 15 of the FSAR. Specifically, FSAR Section 15.6.5, includes an assumption of 9 scfh for SCBL. Since the additional pathways will be tested via the Leakage Rate Test Program to be less than the value assumed in FSAR Section 15.6.5 when the N₂ supply line spectacle flange is in a position other than closed, there is no increase in the consequences of an accident previously evaluated in the SAR.

The proposed action does not increase the consequences of a malfunction of equipment important to safety. Since leakage will not be increased beyond that assumed in the DBA LOCA Dose Analysis in FSAR Chapter 15, the consequences of a malfunction of one of the valves relied upon to limit SCBL from a given penetration will not be increased.

- II. No. The proposed action involves changes associated with how an accident is mitigated or limiting the consequences of an accident previously evaluated in the SAR. Since, the proposed changes affect conditions following an accident, they do not increase the possibility for an accident of a different type than previously evaluated in FSAR Chapters 6 or 15 to occur. Additionally, the proposed changes are associated with limiting SCBL leakage from primary containment following a Design Basis LOCA, and therefore, are not associated with any conditions evaluated in FSAR Chapter 11. Thus, the proposed action does not create a possibility for an accident of a different type than any evaluated previously in the SAR.

The proposed action does not create the possibility for a malfunction of a different type than any evaluated previously in the SAR. The FSAR previously evaluated potential SCBL pathways which rely upon Containment Isolation Valves (CIVs) for limiting leakage. The changes in the proposed action do not introduce the possibility of the systems, structures, or components performing these functions in a manner different than that

previously evaluated in the SAR. Consequently, the possibility for a malfunction of a different type than previously evaluated is not possible.

- III. No. The proposed action does not reduce the margin of safety as defined in the basis for any Technical Specification. The only Technical Specification related to SCBL is SR 3.6.1.3.11, which states that the combined leakage from all SCBL pathways is: ≤ 9 scfh when pressurized to \geq Pa, when in modes 1, 2, or 3. The SCBL pathways are identified in FSAR Table 6.2-15 and the Leakage Rate Test Program. Currently, the N₂ supply lines are identified as a potential SCBL pathway in FSAR Table 6.2-15, but they are evaluated and eliminated as a pathway with the spectacle flange in a closed position. The proposed action identifies that this line will be a SCBL pathway when inerting in modes 1, 2, or 3, and changes the FSAR and Leakage Rate Test Program accordingly.

The proposed action, while increasing the number of valid SCBL pathways, does not result in a corresponding increase in offsite dose beyond the current FSAR values. This is due to the fact that the total combined leakage from all of the SCBL pathways is maintained less than the FSAR analysis value by the Leakage Rate Test Program. This is consistent with the Technical Specification Bases for SR 3.6.1.3.11. Consequently, the existing margin of safety between the licensing basis analysis (i.e., the basis for the Tech Spec) and 10CFR100 limits is maintained.

SER NO: 01-204

CROSS REFERENCE: DCP 221785, Unit N/A

DESCRIPTION OF CHANGE:

This modification will replace the existing SS-5G solid state trip unit with an SS-4G device for the Radwaste Area Load Center 0B330-021 as a result of a 10CFR Part 21 electrical component deficiency identified by Asea Brown Boveri (ABB).

SUMMARY:

- I. No. The proposed action does not affect the spectrum of postulated events for which transients or anticipated operational occurrences and accident conditions were analyzed. The proposed modification maintains the design basis operation of the above mentioned load centers. There is no increase in the probability of an accident, since load center function remains the same. There are no new safety concerns or conditions not already evaluated or discussed in Sections 6 and 15 of the FSAR. This modification does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.
- II. No. The proposed changes do not involve a postulated, initiating event that would create the possibility of an accident of a different type. The proposed action will not affect any structure, system, or component in performing its safety function, because no electrical bus or logic interconnection with any safety-related equipment occurs. Since the load center circuit breaker basic function does not change as a result of this modification, this modification does not create a possibility for an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.
- III. No. The AC power supplies necessary to meet Technical Specification requirements are listed in Technical Specification Table 3.8.7-1. 480 VAC load center 0B330 is not listed as necessary, nor is it required for operation or shutdown of the Unit or for mitigation of the consequences of an accident. In addition, no electrical bus or control logic connection to any Technical Specification related power supply is impacted. Therefore, the margin of safety is not reduced.

SER NO: 01-205

CROSS REFERENCE: DCP 214696, Unit 1

DESCRIPTION OF CHANGE:

The proposed action adds, replaces or relocates fire detectors to provide the appropriate level of compliance of the existing fire detection system for specific areas of Fire Zone 1-2B to support installation of the 1-hour fire barrier upgrade system and Fire Zones 1-3C-W and 1-5A-S as part of the basis for an equivalent level of protection as identified in the FPRR Deviation Requests 27 and 29.

SUMMARY:

- I. No. The proposed actions do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the SAR. There are no impacts on equipment important to safety. The function of the fire detection system affected by the proposed action does not change. Appendix R safe shutdown can be achieved and maintained for postulated fires in any plant area.
- II. No. The proposed action did not identify a postulated initiating event which would create the possibility of an accident of a different type. The qualification and installation program compliance of the fire barrier system precludes the possibility of a malfunction of a different type. There were no new scenarios that could be postulated that would create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. The proposed action does not affect the operability requirements of any safety related system component as governed by Technical Specification or Technical Requirements Manual. The margin of safety as defined in the basis of the Technical Specification or Technical Requirements Manual is not reduced by the proposed action. A Technical Requirements Manual change to Table 3.7.3.8-1 is required to identify new and replaced fire detectors.

SER NO: 01-206

CROSS REFERENCE: DCP-99-3044, Unit 1 and 2

DESCRIPTION OF CHANGE:

The proposed action is to declare the protective fire barrier material inactive on selected raceways in Fire Areas 1-4A-S, 1-5A-S, I-6D, 2-5A,N, 2-6C and 2-6D.

SUMMARY:

- I. No. The proposed actions do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the SAR. The interfacing system evaluations assure the proposed action has no impact on equipment important to safety. The function of the circuits in the raceways affected by the proposed action does not change. Appendix R safe shutdown can be achieved and maintained for postulated fires in any plant area including Fire 1-4A-S, 1-5A-S, I-6D, 2-5A, N, 2-6C and 2-6D.
- II. No. The proposed action did not identify a postulated initiating event which would create the possibility of an accident of a different type. The interfacing system evaluations preclude the possibility of a malfunction of a different type. There were no new scenarios that could be postulated that would create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. The proposed action does not affect the operability requirements of any safety related system component as governed by Technical Specification or Technical Requirements Manual. The operability of the fire barrier system on the raceways is governed by TRM Section 3.7.3.7. The proposed action declares the fire barrier system inactive on specific raceways which contain circuits that are no longer required for safe shutdown based on the latest Appendix R Safe Shutdown Analysis. The margin of safety as defined in the basis of the Technical Specification or Technical Requirements Manual is not reduced by the proposed action.

SER NO: 01-207

CROSS REFERENCE: NL-96-055, Rev. 2, Unit 1 and 2

DESCRIPTION OF CHANGE:

This evaluation considers integrating the Transnuclear West process previously evaluated under 10CFR72 with the spent fuel transfer and storage process using NUHOMS dry storage system.

SUMMARY:

- I. No. The implementation of the spent fuel transfer and dry spent fuel storage process does not increase the probability of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR. Chapter 9 and 15 of the FSAR have been reviewed against the effects of this process to substantiate this conclusion.
- II. No. Isolating the Spent Fuel Storage Peak by closing the Cask Storage Pit gates during the spent fuel transfer process and the operation of the independent Spent Fuel Storage Installation and implementation of the spent fuel process as it relates to 10CFR50 does not increase the probability of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR. Chapter 9 and 15 of the FSAR have been reviewed against the effects of this process to substantiate this conclusion.
- III. No. The implementation of the spent fuel transfer and dry spent fuel storage process does not reduce the margin of safety as defined in the basis for any Technical Specification or Technical Requirement. The Technical Specifications and Technical Requirements Manuals do not apply to the spent fuel transfer and dry spent fuel storage process, thus the margin of safety defined in their bases are not reduced.

SER NO: 01-208

CROSS REFERENCE: NL-99-089, Unit 1 and 2

DESCRIPTION OF CHANGE:

Revision of FSAR Table 6.5-4 and the appropriate operating procedures to address a failed open Recirc Isolation Damper. The scope of the evaluation also removes the manual overrides from the actuators of the Recirc Isolation dampers.

SUMMARY:

- I. No. The implementation of this change for secondary containment control and mitigation of a failed open Recirc Isolation damper does not increase the probability or consequences of an accident or malfunction of equipment important to safety as previously evaluated in the SAR. The FSAR safety analyses rely upon Secondary Containment integrity for control of radioactive releases. Secondary Containment isolation utilizes plant equipment per its design intent and is consistent with the use of that equipment as described in FSAR Sections 6.2.3 and 9.4.2. Hence, the actions specified preserve the function of Secondary Containment.
- II. No. The FSAR safety analyses rely upon Secondary Containment integrity for control of radioactive releases. Secondary Containment isolation utilizes plant equipment per its design intent and is consistent with the use of that equipment as described in FSAR Sections 6.2.3 and 9.4.2. The actions specified preserve the function of Secondary Containment and do not create a possibility for an accident or malfunction of different type than previously evaluated in the SAR.
- III. No. If a failed open Recirc Isolation damper prompts an Operator to initiate a Reactor Building isolation, the Recirc Isolation dampers open, and the secondary containment isolation dampers close. Thus, the failed open Recirc Isolation damper would already be in its safe position thereby mitigating the consequence of its failure. In addition, for secondary containment control ensures any releases due to a failed open Recirc Isolation damper comply with TRM 3.11.2. "Gaseous Effluents".

Reactor Building isolation utilizes plant equipment for its intended purpose and in accordance with the assumptions of the FSAR analyses. Therefore, the proposed action does not reduce the margin of safety as defined in the basis for any Technical Specification, or require a change to any Technical Specification.

SER NO: 01-209

CROSS REFERENCE: DCP 99-3041, Unit 1

DESCRIPTION OF CHANGE:

The scope of this modification is the replacement of Valcor solenoid operated valves (SOVs) on twenty-four (24) air-operated valves (AOVs) in the Reactor Core Isolation Cooling (RCIC), High Pressure Coolant Injection (HPCI), Drywell Floor & Equipment Drain to Liquid Radwaste Collection, and Reactor Building Chilled Water systems. The replacement solenoids valves are Automatic Valve Company (AVCo) series U0203GBBR's.

SUMMARY:

- I. No. The proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR. The replacement solenoid valves are considered a design upgrade to provide a more reliable solenoid valve and therefore increase the reliability of the associated air-operated valves. The SOV, the associated AOVs, and their stroke times are not included in any accident analysis or the calculation of offsite dose. The accidents described in FSAR Sections 6.2, 6.3, and 15.0 were reviewed to form the basis for this response.
- II. No. The proposed action does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR. The replacement direct acting solenoid valve is of similar form, fit and function, requiring the same electrical power source and air/gas supply requirements as the solenoid that it will replace. Failure modes of the replacement solenoid on loss of power, loss of air/gas supply, coil failure; will still result in a fail safe (fail closed/venting air) position resulting in the same air-operated valve fail closed position existing prior to the modification. There are no effects to other systems or components that have safety functions that could lead to their failure in a different way that could contribute to an accident or malfunction of a different type. Chapters 6 and 15 of the FSAR were reviewed to form the basis for this response.
- III. No. The proposed action does not reduce the margin of safety as defined in the basis for any Technical Specification. Technical Specifications 3.5 (HPCI/RCIC) and 3.6.1.3 (Primary Containment Isolation Valves) were reviewed to form the basis for this response. The affected HPCI/RCIC SOVs and their associated AOVs are not discussed in Tech Spec section 3.5, or the associated bases. The remaining valves are containment isolation valves shown on Table B 3.6.1.3-1 in the Tech Spec Bases. The Tech Spec Bases Maximum Isolation Times will be increased for HV-18782A1, A2, 1B, B2 (from 6 to 12 seconds) and HV-18792A1, A2, B1.B2 (from 4 to 8 seconds) resulting in a change to Table B 3.6.1.3-1. These stroke times are not used in any accident analysis or in the calculation of offsite dose.

SER NO: 01-210

CROSS REFERENCE: NL-99-082, Unit 1 and 2

DESCRIPTION OF CHANGE:

This change revises plant procedures in order to operate Diesel Generator (DG) OG501A through E with their intercooler temperature control valves, TV-01124A through E, in the full open (de-energized) position.

SUMMARY:

- I. No. The proposed change will restore the Emergency Service Water (ESW) System and Diesel Generators to a configuration that is similar to their original design. Temperature control valves TV-01124A through E did not exist in the original plant design.

It is concluded that the proposed change of disabling the temperature control for TV-01124A-E will not prevent the diesel generators from performing their intended function, nor will it contribute to increasing the probability of a diesel failure during the short period these procedure changes will be in effect.

The proposed change will not require additional flow balancing to be performed on the ESW System. The proposed change is being performed to assure that none of the ESW pumps will be damaged by operating at too low a flow rate. Flow rate is a concern, due to variances in ESW pump output resulting from recent overhauls of two of the ESW pumps. The proposed change maintains the probability of a malfunction of an ESW pump within plant design parameters.

FSAR Chapter 15 was reviewed for accident types. The proposed change affects operation of the Diesel Generators and the ESW System, but it does not increase the probability of occurrence of an accident.

Therefore, the proposed change does not increase the probability of design basis accidents, radiological consequences of an accident, or failure modes of equipment important to safety.

- II. No. The proposed change does not introduce any new failure mechanism. Failure of a diesel generator has been previously evaluated. The design of the temperature control valve is to fail open. Therefore this condition has been evaluated previously. Cooler intake air temperatures could lead to slightly more condensation being entrained in the inlet air carried into the cylinders. However, this situation is discussed in an NRC SER dated May 11, 1992, with the conclusion that condensation will not cause any significant lubrication oil film degradation or engine damage. In addition, failure of an ESW pump has been previously evaluated. The proposed change will not introduce a generic failure mode, nor will it adversely affect either the operability of the diesels or ability of the diesels to perform their safety function. Therefore, the proposed change does not

create the possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.

- III. No. Technical Specification 3.7.2 addresses the Emergency Service Water System. This section is concerned with providing adequate ESW flow rate. Technical Specifications 3.8.1, 3.8.2, and 3.8.3 are applicable to the Diesel Generators. There is no discussion of either flow rates to the diesel intercoolers or ESW pump minimum flow rates in the Technical Specifications, although the individual pump flow rates are tested in the Station Pump and Valve Testing Program. The Bases for these Technical Specifications were also reviewed. Section 9.2.1 of the SER, NUREG-0776, which addresses ESW, was reviewed. Section 9.6.3.3 of the SER, which addresses diesel engine cooling water, was also reviewed. The proposed change does not affect NUREG-0776.

The proposed change does not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-211

CROSS REFERENCE: NL-99-090, Unit 2

DESCRIPTION OF CHANGE:

All 60 cells of the, degraded Battery Bank 2D630 are to be replaced on-line.

SUMMARY:

- I. No. This change, which controls the replacement of 2D630 Battery Bank while Unit 2 is operating, does not increase the probability of occurrence of an accident or malfunction of equipment. This change substitutes 15 supplemental Type KCR-21 cells into 2D630 Battery Bank that are electrically identical to the existing cells in the 2D630 Battery Bank. These cells will be tested by the factory to meet the 2D630 Modified Performance Discharge Profile. The 15 supplemental cells meet Seismic Category I requirements and meet the Separation, Redundancy and Independence requirements to assure that any single failure within the DC system is limited in its effect, such that the required safety function of the system is not prevented from being performed. The connecting of the 15 supplemental cells into 2D630 Battery Bank meets all the design requirements of the original design of 2D630 Battery Bank. 2D630 battery Bank, with the 15 supplemental cells substituted, conforms to the technical requirements of the existing 2D630 Battery Bank and have adequate capacity to support the service duty loads profile and Station Blackout discharges. There are no new radiological release paths, no impact on radiation barriers and no change in the release rate or duration.
- II. No. 2D630 battery Bank with the 15 supplemental cells substituted:
 - Conforms to the technical requirements of IEEE 484, except that all edges of one side of all plates are not visible. The cells will be inspected during the installation process for indication of physical damage or abnormal deterioration.
 - Has adequate capacity to support the service duty load profile and Station Blackout load profile discharge.
 - Meets the Separation, Redundancy and Independence requirements to assure that any single failure, within the DC system, is limited in its effect such that the required safety function of the system is not prevented from being performed,

The 15 supplemental cells and the temporary battery lifting structure are designed to meet Seismic Category I requirements. This design assures that there are no new failure modes. Therefore, the Failure Modes and Effects Analysis in FSAR Table 8.3-21 bounds the 2D630 battery Bank with the 15 supplemental cells substituted.

Therefore, this change does not create a possibility for an accident or malfunction of a different type than evaluated previously in the SAR.

- III. No. With the 15 supplemental cells connected into 2D630 Battery Bank, all four DC load groups are operable and meet the Limiting Condition for Operation 3.8.4 and the DC portion of the Limiting Condition for Operation 3.8.7. Therefore, the margin of safety as defined in the bases for any technical specification is not reduced.

SER NO: 01-212

CROSS REFERENCE: DCP 214699, Unit N/A

DESCRIPTION OF CHANGE:

The proposed action adds and replaces fire detectors to provide the appropriate level of compliance of the existing fire detection system for specific areas of Fire Zone 0-41A, 0-41B, 0-41C and 0-41D. These changes satisfy the commitments made to the NRC and FPRR Table 5.0-1, Section F.6 regarding fire detection coverage in the Diesel Generator Building.

SUMMARY:

- I. No. The proposed actions do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the SAR. There are no impacts on equipment important to safety. The function of the fire detection system affected by the proposed action does not change. Appendix R safe shutdown can be achieved and maintained for postulated fires in any plant area.
- II. No. The proposed action did not identify a postulated initiating event which would create the possibility of an accident of a different type. There were no new scenarios that could be postulated that would create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. The proposed action does not affect the operability requirements of any safety related system component as governed by Technical Specification or Technical Requirements Manual. The margin of safety as defined in the basis of the Technical Specification or Technical Requirements Manual is not reduced by the proposed action. A Technical Requirements Manual change to Table 3.7.3.8-1 is required to identify new fire detectors.

SER NO: 01-213

CROSS REFERENCE: DCP 228805, Unit N/A

DESCRIPTION OF CHANGE:

This modification will replace the existing SS-5G solid state trip unit with an SS-4G device (in all associated cubicles that contain these existing devices) at the Radwaste Area Load Centers OB330 and OB340 as a result of a 10CFR Part 21 electrical component deficiency identified by Asea Brown Boveri (ABB).

SUMMARY:

- I. No. The proposed action does not affect the spectrum of postulated events for which transients or anticipated operational occurrences and accident conditions were analyzed. The proposed modification maintains the design basis operation of the above mentioned load centers. There is no increase in the probability of an accident, since load center function remains the same. There are no new safety concerns or conditions not already evaluated or discussed in Sections 6 and 15 of the FSAR. This modification does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.
- II. No. The proposed changes do not involve a postulated initiating event that would create the possibility of an accident of a different type. The proposed action will not affect any structure, system, or component in performing its safety function, because no electrical bus or logic interconnection with any safety-related equipment occurs. Since the load center circuit breaker basic function does not change as a result of this modification, this modification does not create a possibility for an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.
- III. No. The AC power supplies necessary to meet Technical Specification requirements are listed in Technical Specification Table 3.8.7-1. 480 VAC load centers OB330/OB340 are not listed as necessary, nor is it required for operation or shutdown of the unit or for mitigation of the consequences of an accident. In addition, no electrical bus or control logic connection to any Technical Specification related power supply is impacted. Therefore, the margin of safety is not reduced.

SER NO: 01-214

CROSS REFERENCE: NL-99-085, Unit N/A

DESCRIPTION OF CHANGE:

The change to TR Table 3.11.4.1-1 adds a footnote to the column headed "Type and Frequency of Analysis" in the Table and the change to section 2.1.3 of ODCM-QA-008 removes a reference to sample analyses. The footnote in Table 3.11.4.1-1 explains that the intervals between sample analyses are exceptions to TRS 3.0.2, and that this position is consistent with the guidance of section C.2.b of Regulatory Guide 4.1.

SUMMARY:

- I. No. No accident as described in the SAR could be caused, in whole or in part, or be exacerbated by these changes to TR Table 3.11.4.1-1 & ODCM-QA-008. No systems or components at SSES are affected by these changes; therefore, no increase in the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety can occur.
- II. No. No accidents of any type could be caused, in whole or in part, or be exacerbated by these changes to TR Table 3.11.4.1-1 and ODCM-QA-008. No systems or components at SSES are affected by these changes; no changes in function or operation of SSES components are made. Therefore, the proposed action does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. Sections 5.4.1, 5.5.1, 5.5.10, and 5.6.2 of Technical Specifications have been reviewed and have been determined to be unaffected by these changes. These changes to TR Table 3.11.4.1-1 & ODCM-QA-008 do not affect any physical parameters, instruments, response times, redundancy and/or Independence of components. Therefore, no margin of safety is reduced.

SER NO: 01-215

CROSS REFERENCE: DCP 97-9055, Unit N/A

DESCRIPTION OF CHANGE:

This modification performs the necessary analysis, and replaces the parts necessary, to increase the rated load of the Circulating Water Pumphouse (CWPH) crane from 25 to 27 tons.

SUMMARY:

- I.. No. Based upon a review of the FSAR and the SSES SER, there are no initiating events that are adversely impacted by either the CWPH Crane, the CWPH Structure, nor the 480V Load Center, since they are not specifically described in the FSAR. Also based on this review, none of the affected components interface with equipment that is important to safety nor create any new interfaces of any type. The Safety Impact Item program was reviewed to ensure no new safety impact items were created as a result of the increase in crane rating. The equipment affected by this modification is outside the Radiologically Controlled Area (RCA) and does not interface with equipment that is inside the RCA, nor with equipment considered to be a barrier to a radiological release. Therefore, the proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.
- II. No. This modification will be designed, installed, and tested to the applicable codes and standards. As stated previously, there are no new interfaces created nor are existing ones adversely affected. Therefore, the proposed action does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.
- III. No. The Unit 1 and Unit 2 Technical Specifications (and Bases) and Technical Requirements Manual (TRM) have been reviewed with reference to this modification. No sections were found to apply. Since this modification changes no design parameters (related to any margin of safety), this modification does not reduce the margin of safety as defined in the bases for any Technical Specification.

SER NO: 01-216

CROSS REFERENCE: NL-99-020, Unit 1 and 2

DESCRIPTION OF CHANGE:

This evaluation documents the acceptability of temporarily storing a maximum of four control blades in the Unit 1 and/or the Unit 2 spent fuel pool in the space between the spent fuel racks and the spent fuel pool walls.

SUMMARY:

- I. No. The design basis accidents listed in Chapter 15 of the FSAR were reviewed for potential impact by this change. Temporary storage of a maximum of four control blades in the Unit 1 and/or the Unit 2 spent fuel pool in the space between the spent fuel racks and the spent fuel pool walls does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the SAR. This change also has no impact on the analysis provided in Chapter 9A of the FSAR for the non-seismic spent fuel pool cooling system. The fuel handling accident envelopes potential consequences of a control blade temporary storage stand impacting spent fuel assemblies.
- II. No. The temporary storage of a maximum of four control blades in the Unit 1 and/or the Unit 2 spent fuel pool in the space between the spent fuel racks and the spent fuel pool walls does not create the potential for a new type of unanalyzed accident or a new type of malfunction. Also, the storage of control blades at the same relative locations in the spent fuel pools by means of slings has previously been reviewed for Unit 1 and for Unit 2.
- III. No. Section 3.7.7 of the Technical Specifications addresses Spent Fuel Storage Pool Water Level with the requirement that the spent fuel storage pool water level be greater than or equal to 22 feet over the top of irradiated fuel assemblies in the spent fuel storage racks during movement of irradiated fuel assemblies in the spent fuel storage pools.

Section 4.3 Fuel Storage includes Section 4.3.1 Criticality which includes spent fuel storage rack design criteria and Section 4.3.2 Drainage which states that the spent fuel storage pool is designed and shall be maintained to prevent inadvertent draining of the pool below elevation 816 ft - 9 inches.

Since this change does not effect the structural integrity of the spent fuel pool, it has no impact on spent fuel pool water level or drainage. Also, this change does not alter the critical design features of the spent fuel storage racks. Thus the margin of safety is not reduced.

SER NO: 01-217

CROSS REFERENCE: DCP 232194 & 232197 (Revision 0), Unit 1
DCP 232746 & 232747 (Revision 1), Unit 1

DESCRIPTION OF CHANGE:

Install calibration connection isolation valves in H202 Panels 1C226A/B for FI-1C226A/B and Local Leak Rate Test (LLRT) Test Connections in H202 Analyzer Panels.

SUMMARY:

I. No. The modification does not increase the probability or consequences of an accident or malfunction of equipment important to safety as previously evaluated in the SAR as follows: The modification maintains the pressure boundary integrity of the affected containment penetrations, which are described in the FSAR Section 6.2, and does not impact the primary containment isolation system as described in FSAR Section 6.2.4. The function, performance and operation of the H202 Analyzer System as described in FSAR Section 6.2.5 is not changed by the modification.

II. No. The modification does not create the possibility of an unanalyzed accident or malfunction since the results are non-functional changes to the H202 Analyzer System and the affected containment penetrations. All design requirements to ensure pressure boundary integrity is maintained have been incorporated into the modification.

Therefore, the proposed action does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.

III. No. The modification will not reduce the margin of safety as defined in the basis for any Tech Spec as follows: 1) there is no change to the function, performance or operation of the H202 Analyzer System, 2) there are no changes to the established limits for hydrogen or oxygen inside containment, 3) there are no functional changes to the containment structure or containment isolation system, 4) the existing operability requirements for the containment, including the containment isolation system, are not changed.

SER NO: 01-218

CROSS REFERENCE: DCP 232309, Unit 1

DESCRIPTION OF CHANGE:

This modification will replace the existing Traversing In-Core Probe (TIP) proximity probe GE Part No. 195B9532P001 with an upgraded GE Part No. RS-ME-0602-062.

SUMMARY:

- I. No. The proposed action does not affect the spectrum of postulated events for which transients or anticipated operational occurrences and accident conditions were analyzed. The proposed modification maintains the design basis operation of the TIP system as described in FSAR Sections 6.2.9.3.3.10 and 7.7.1.6. There is no increase in the probability of an accident, since the function remains the same. There are no new safety concerns or conditions not already evaluated or discussed in Sections 6 and 15 of the FSAR. This modification does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.
- II. No. The proposed changes do not involve a postulated initiating event that would create the possibility of an accident of a different type. The proposed action will not affect any structure, system, or component in performing its safety function, because no interconnection with any safety-related equipment occurs. Since the TIP system's basic function does not change as a result of this modification, this modification does not create a possibility for an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.
- III. No. The operation of the TIP system to perform Tech Spec Surveillance Requirements 3.3.1.1.8, 3.6.1.3.4, and 3.6.1.3.10 is not impacted. Therefore, the proposed action does not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-219

CROSS REFERENCE: NL-00-007, Unit 1 and 2

DESCRIPTION OF CHANGE:

Section 8.4 is being revised in NDAP-QA-0412, "Leakage Rate Test Program", to allow 10CFR50 Appendix J Type C testing of the isolation valves for H₂O₂ panels that connect to primary containment atmosphere. The revised section will allow tested isolation valves to be the containment boundary when the valves are closed. The revised section also allows reverse testing of designated isolation valves to obtain the leak rate for the valve. The leak rate for each isolation valve will be included in the Type B and Type C test running totals.

SUMMARY:

- I. No. Leak rate testing of the isolation valves is associated with limiting the consequences of an accident previously evaluated in the SAR. Leak rate testing of the isolation valves ensures primary containment integrity following an accident. This leak rate testing does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.
- II. No. Leak rate testing of the isolation valves is associated with the integrity of containment following a Design Basis Accident. As such, it does not introduce the possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. Leak rate testing of the isolation valves does not reduce the margin of safety as defined in the Tech Specs. The proposed change would include any leakage through the isolation valves in the Type B and Type C running totals. This ensures that containment leakage remains below the criteria specified in the Tech Specs for all containment.

SER NO: 01-220

CROSS REFERENCE: DCP 220589, Unit 1 and DCP 221778, Unit 2

DESCRIPTION OF CHANGE:

This modification replaces each pump Control Rod Drive (CRD) discharge stop-check valve with a separate check and manual ball valve.

SUMMARY:

- I. No. Based upon a review of the FSAR (Sections 3.6, 3.8B, 3.9, 3.13, 4.3, 4.6, 5.2, 5.3, 6.0A, 6.2, 12.3, 14.2, 14.3, 18.1, Questions 021.14, .37, .59, .87, 032.22, .101, 110.37, 112.7, 130.13, 211.1, .17, .24, .35, .41-.44, .192, 423.12), the FPRR, the SSES Safety Evaluation Report (Sections 3.10, 4.6 & its Supplements), there are no initiating events described in the FSAR involving the components being modified. In addition, this modification does not change any of the design parameters of the CRD system (e.g., design flows and pressures) which support the functions of the system. The new components will be designed to the applicable codes and standards and the CRD hydraulic system will continue to conform to the applicable codes and standards. All of the existing interfaces (including those with equipment important to safety) are not adversely affected and no new interfaces have been created. The portion of the CRD system to be modified does not perform a safety-related function and is not considered as a barrier to radiological release. Therefore, the proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.
- II. No. The CRD hydraulic system is taken credit for the Main Steam Isolation Valve (MSIV) closure Anticipated Transient Without Scram (ATWS) event for coolant makeup to the vessel (reference FSAR Tables 15.8-5 and 15.8-6), and it is used to drive in Control Rods during ATWS events and also for vessel makeup (for beyond design basis accidents) as presented in the SSES Emergency Operating Procedures. This modification does not adversely impact these accident types since none of the CRD design parameters are changed as part of this modification and the modification conforms to all of the appropriate codes and standards. Therefore, the proposed action does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. Based upon a review of the Technical Specifications and Bases (Sections 3.1, 3.4.1, 3.9, 3.10), and the Technical Requirements Manual (TRM) (Sections 3.1, 3.2, and 3.4) with reference to the functions of the CRD hydraulic system, there are no CRD system design parameters changed as a result of this modification (which could reduce any margin of safety). Therefore, this modification will not reduce any margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-221

CROSS REFERENCE: NL-99-091, Unit 1

DESCRIPTION OF CHANGE:

TP-106-001 provides the necessary guidance and work group coordination to safely de-energize Division II ESS MCC's 1B226, 1B227 and 0B527 to replace solid state trip devices (Gray Boxes) in Load Center circuit breakers 1B22013, 1B22021 and 1B22023 with Unit 1 Reactor in Mode 4 or 5 and Unit 2 Reactor in any Mode of operation.

SUMMARY:

- I. No. The equipment required for fuel movement is available and the power to this equipment is not removed during performance of this TP. During performance of TP-106-001, AC power is removed from isolation dampers and valves. This does not result in the movement of isolation dampers or isolation valves. There is sufficient equipment available to meet the Technical Specifications or the appropriate LCO/TRO Action Statements have been entered when MCC 1B226, 1B227 and 0B527 are de-energized. There is no Division I equipment supplied from MCC 1B226, 1B227 and 0B527. Deenergizing MCC 1B226, 1B227 and 0B527 does not impact operation of Division I equipment. Therefore, performance of this TP does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.
- II. No. Performance of TP-106-001 de-energizes MCC 1B226, 1B227 and 0B527. This is less significant than the loss of Division 11 AC Distribution System that has been analyzed in the FSAR. Loss of 1B226, 1B227 and 0B527 does not prevent the rest of the plant electrical system from performing its design safety function as described in FSAR Section 8.3. The equipment required for fuel movement is also operable. There are no new mechanisms for failures to prevent proper protective action at the system level when required during performance of TP-106-001. De energizing 1B226, 1B227 and 0B527 causes the loss of common equipment that results in the need to enter LCO/TRO Action Statements for Unit 2. The reactor operator's ability to maintain Unit 1 in Modes 4 or Mode 5 and Unit 2 in Modes 1, 2, 3 is not degraded since the safety systems/components required in these modes are operable or the appropriate LCO/TRO Action Statements have been entered. Therefore, TP-106-001 does not create a possibility for an accident or malfunction of a different type than evaluated previously in the SAR.
- III No. The Technical Specification Bases for Electric Power Systems, Section B3.8, states that the AC electrical power sources are designed to provide sufficient capacity, capability, redundancy and reliability to ensure the availability of necessary power to Engineered Safety Features systems so that the fuel, reactor coolant system and containment design limits are not exceeded. Also, power must be available to maintain the facility in shutdown or refuel conditions for extended periods and sufficient instrumentation/control equipment must be operable for monitoring and maintaining the unit status. The Technical Specifications/Technical Requirements Manual requirements for the Unit I affected systems in Mode 4 and Mode 5 and the Unit 2 affected systems in

Mode 1, 2, 3 are satisfied or the appropriate LCO/TRO Action Statements have been entered. The equipment required for fuel movement is operable when MCC 1B226, 1B227 and 0B527 are de-energized. Therefore, the margin of safety as defined in the bases for any technical specification is not reduced.

SER NO: 01-222

CROSS REFERENCE: NL-00-008, Unit 1 and 2

DESCRIPTION OF CHANGE:

The purpose of this change is to provide direction and requirements to install and remove plugs in one or two Reactor Recirculation Outlet nozzles and up to twenty Jet Pump nozzles. Installation of these plugs will result in partial or complete isolation of the Reactor Recirculation System (RRS) from the reactor vessel. The RRS isolation is necessary to support maintenance activities such as piping chemical decontamination, small bore pipe repairs and isolation valve overhauls/repairs.

SUMMARY:

- I. No. The effects of installation/removal of the RR Outlet Nozzle and Jet Pump Plugs are currently addressed and bounded by accidents and evaluations currently in the FSAR. Since these plugs are installed on temporary basis to support maintenance activities while the cavity is flooded and reactor in Mode 5, evaluations involving the plant in Mode 1, 2, 3 & 4 are not considered. Therefore, the proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.
- II. No. This action is bounded by existing analysis. Temporary installation and removal of the plugs does not create a new accident. Therefore, this action does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. The bases for Technical Specification 3.9.7 indicates that although Residual Heat Removal (RHR) is not required to mitigate any events or accidents addressed in any safety analysis, it is an "important contributor" to risk reduction. The bases also discusses if one loop of the RHR shutdown cooling subsystem is not available, alternate decay heat removal paths can be used, and is allowed by Technical Specifications. It does state that natural circulation with fuel pool cooling is an alternate decay heat removal flowpath, which is available when the cavity is flooded greater than 22 feet. An evaluation has been performed which shows that natural recirculation flowpath through the Jet Pump flow mixer opening is not significantly impacted by the installation of the Jet Pump Nozzle Plugs, even if one of the plugs were to become stuck and block the entire throat of the Jet Pump. The fuel pool heat exchanger inlet temperature monitor will be used to fulfill the reactor coolant temperature monitoring requirement in TS 3.9.7. The fuel pool temperature limit of 125F (FSAR Section 9.1.3) along with natural circulation will ensure adequate core cooling. Therefore, the isolation of RHR will not cause a significant reduction in the margin of safety and natural circulation with Fuel Pool cooling will be sufficient to maintain acceptable reactor coolant temperature conditions.

In addition to losing RHR and Reactor Recirculation flowpath, the Reactor Water Cleanup (RWCU) System flowpath is isolated which removes it as an alternative method of decay heat removal or to control coolant chemistry. The coolant chemistry parameters will be maintained within limits established in TRO 3.4.1 using the Fuel Pool Cooling & Cleanup System. Therefore, the isolation of RWCU does not result in a significant reduction in the margin of safety.

SER NO: 01-223

CROSS REFERENCE: NL-00-009, Unit 1

DESCRIPTION OF CHANGE:

The purpose of the change is to provide instructions to perform a chemical decontamination of the Unit 1 Reactor Recirculation System to reduce the general radiation fields within the drywell.

SUMMARY:

- I. No. The chemical decontamination of the Unit 1 Reactor Recirculation System piping will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to the safety, as previously evaluated in the FSAR. The evaluation considered potential effects to the Reactor coolant inventory (FSAR 15.6), the impact on the Reactor pressure boundary (FSAR 5.2), potential radioactive release from subsystem and components (FSAR 15.7) and physical impacts to the building and structure. The worst possible event causing loss of reactor coolant would be ejection/seal failure of a plug. This would result in an insignificant loss of reactor coolant from the cavity and have no impact on the ability to maintain adequate core cooling. Since the plugs are not seismically qualified, they could become dislodged during a seismic event. Under these conditions, the reactor pressure boundary would be maintained by closing the Reactor Recirculation System suction and discharge valves. After the chemical decontamination project is complete, radioactive resins and filters will be transported to the Radwaste facility for final processing. Any potential accidents that could occur during this process are bounded by those previously analyzed in FSAR 15.7.3. The safety impact of all vendor equipment on the floors and supporting structures has been evaluated and found acceptable.
- II. No. The chemical decontamination of the Unit I Reactor Recirculation System piping does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR. The evaluation considered the chemical degradation and effects on all components in the Reactor Recirculation System, the potential for chemical introduction into the Reactor Vessel and associated impacts on core components or the fuel, potential chemical reactions, spills, the impact on the plant electrical distribution system and the impact of a seismic event. Level control during the process will ensure that the chemical levels will not contact the N1 nozzles to minimize potential for chemical contact with the low carbon steel in this area or chemical introduction into the vessel. Chemical reaction studies were performed to ensure that no toxic or hazardous byproducts could be formed from a chemical reaction between any of the decontamination chemicals with other materials that may be found in the drywell. Plant floor drains in the area and the drywell sump will be isolated to prevent spreading of the chemicals into the plant Radwaste System. Spills will be contained and cleaned by the site's Spill Response Team.

- III. No. The chemical decontamination of the Unit I Reactor Recirculation System piping does not reduce the margin of safety as defined in the basis for any Technical Specification. Current plant Technical Specifications were reviewed to determine potential impacts. No additional impacts were found, other than those previously evaluated as a result of the Plug installation and removal process.

SER NO: 01-224

CROSS REFERENCE: DCP 200715, Unit 1

DESCRIPTION OF CHANGE:

A modification will be implemented to replace the actuator motor pinion and worm shaft gear on HV-ISIF008, the Shutdown Cooling Suction Outboard Containment Isolation Valve.

SUMMARY:

- I. No. The modification will not increase the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety as previously evaluated in the SAR. The gearset replacement will not affect the pressure retaining boundary of the valve or adversely affect the active safety function for HV-151F008 to close for its Primary Containment Isolation Valve (PCIV) or Residual Heat Removal (RHR) isolation functions, its hydraulic characteristics, or its seat leakage characteristics. FSAR Sections 3.9.3.2b.2, 5.4.7, 6.2.4, 7.6.1a.3.3, and Chapter 15, and FSAR Questions 211.48, 211.55, and 211.56 have been reviewed in making this determination,
- II. No. The modification does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR. The effects of the modification are to decrease the inertial forces after torque switch trip and to increase the motor capability margin. Neither of these effects create the possibility of a new accident or malfunction. The active safety functions, which are to close under Shutdown Cooling System isolation logic signals and PCIV isolation signals, are not adversely impacted by the modification. This valve does not have an active safety function to open. FSAR Sections 5.4.7, 6.2.4, 7.6.1a.3.3, and Chapter 15, and FSAR Questions 211.48, 211.55, and 211.56 have been reviewed in making this determination.
- III. No. The modification will not reduce the margin of safety as defined in the basis for any Technical Specifications. The integrity of the valve pressure boundary, hydraulic characteristics, and valve seat leakage rate will not be adversely affected by the actuator gearset replacement. The Technical Specifications Bases Sections B3.6.1.3, "Primary Containment Isolation Valve", B3.6.1.1, "Primary Containment", B3.4.8, "Residual Heat Removal (RHR) Shutdown Cooling System - Hot Shutdown", B3.4.9 "Residual Heat Removal (RHR) Shutdown Cooling System Cold Shutdown", B3.9.7 "Residual Heat Removal (RHR) - High Water Level", and B3.9.8 "Residual Heat Removal (RHR) - Low Water Level" were reviewed in making this determination.

SER NO: 01-225

CROSS REFERENCE: DCP 232583, Unit 2

DESCRIPTION OF CHANGE:

This modification will replace the existing Traversing In-Core Probe (TIP) proximity probe GE Part No. 195B9532P001 with an upgraded GE Part No. RS-ME-0602-062.

SUMMARY:

- I. No. The proposed action does not affect the spectrum of postulated events for which transients or anticipated operational occurrences and accident conditions were analyzed. The proposed modification maintains the design basis operation of the TIP system as described in FSAR Sections 6.2.9.3.3.10 and 7.7.1.6. There is no increase in the probability of an accident, since the function remains the same. There are no new safety concerns or conditions not already evaluated or discussed in Sections 6 and 15 of the FSAR. This modification does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.
- II. No. The proposed changes do not involve a postulated initiating event that would create the possibility of an accident of a different type. The proposed action will not affect any structure, system, or component in performing its safety function, because no interconnection with any safety-related equipment occurs. Since the TIP system's basic function does not change as a result of this modification, this modification does not create a possibility for an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.
- III. No. The operation of the TIP system to perform Tech Spec Surveillance Requirements 3.3.1.1.8, 3.6.1.3.4, and 3.6.1.3.10 is not impacted. Therefore, the proposed action does not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-226

CROSS REFERENCE: SCP 217354, Unit 1 and 2

DESCRIPTION OF CHANGE:

The deadband for the temperature control cycle for the offgas recombiner piping heat trace controllers will be reduced to maintain the piping at a more even temperature.

SUMMARY:

- I. No. The Gaseous Radwaste system is discussed in FSAR section 11.3, Gaseous Waste Management systems. The piping heat trace system is briefly discussed in section 11.3.2.3.1, which states that in Standby mode the heat trace and preheater bleed steam keeps the system within a temperature range of 240 deg F to 270 deg F, thus preventing condensation when switching the offgas stream from an operating recombiner to the standby one. This change does not impact, but enhances the ability of the system to maintain temperature within the stated band. The Gaseous Radwaste System Leak of Failure accident described in FSAR section 15.7.1 was reviewed for applicability to this change. The parameters affected by this change, i.e., recombiner piping maintenance temperature, do not affect the radiological consequences of the accident. This change does not affect safety systems and has no effect on failure modes of systems important to safety. This change does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.
- II. No. The proposed change does not modify the plant's accident response, therefore, no possibility for an accident of a different type is created. Failure modes of equipment important to safety are unaffected by this change. The proposed action does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.
- III. No. The offgas recombiner heat trace system is not discussed in the Technical Specifications of Technical Specifications bases. The function of the heat trace system as described in the FSAR is not altered by the change. The proposed action will not reduce the margin of safety as described in the basis for any Technical Specification.

SER NO: 01-227

CROSS REFERENCE: NL-00-005, Unit 1

DESCRIPTION OF CHANGE:

This safety evaluation addressed the safety impact of installing intrusive and nonintrusive instrumentation on the Residual Heat Removal (RHR) and RHR Service Water (SW) systems during operation in shutdown cooling mode. The flow and temperature data collected from this instrumentation will be used to determine RHR Heat Exchanger 1A thermal performance.

SUMMARY:

- I. No. This test will take data to measure heat exchanger (HX) performance while the system is running in a normal shutdown cooling alignment in accordance with normal operating procedures.

Temporary non-intrusive instruments (RTD's and polysonic flow instr.) will support data collection of RHR HX A flow and fluid temperatures. These will be removed as part of test restoration.

RHRSW flow will be recorded using a data logger connected to the installed plant flow recorder circuit. This modifies the Safety Related Display Instrumentation (FSAR Table 7.5-1) for RHRSW flow indication. The data logger is not safety related qualified and could potentially impact control room flow indication. Therefore, this procedure temporarily changes the facility as described in the FSAR.

- II. No. The installation of the data loggers dc voltage monitoring instrumentation on the RHRSW flow indication does not affect the associated control room flow indication used by the control operator to control shutdown cooling operation. The flow indication loop does not directly control the operation of any plant equipment and therefore any failure of the loop will not initiate any plant transient

The installation of the data logger was evaluated for its potential to disable the RHRSW control room flow indication. In order to preclude failure and minimize the effects of an inadvertent failure:

1. The data logger was confirmed to be a high impedance device. It should have no effect on the flow signal to the control room indication.
2. As a precaution, the proper operation of the RHRSW flow indication will be confirmed after installation. If proper control room flow indication is not obtained, the data logger will be removed.

These actions allow use of the data logger without affecting safe operation.

The non-intrusive instrumentation will not have any impact on the operation of RHR or RHR Service Water.

- III. No. The heat exchanger performance test does not significantly affect the safety of SSES. No Technical Specifications are affected by the temporary change to the facility as described in the FSAR.

SER NO: 01-228

CROSS REFERENCE: NL-99-072, Unit 1 and 2

DESCRIPTION OF CHANGE:

This change corrects the FSAR to reflect the as-built plant and eliminates the need for modifications to provide water seals in the drain headers of drainage piping that joins areas required to maintain an air pressure differential.

SUMMARY:

- I. No. All four of the drain headers provide leakage paths from areas within the secondary containment boundary to areas outside the boundary. The integrity of secondary containment could potentially be compromised by the reduction in the leak tightness of the boundary. The leak tightness of the secondary containment boundary also has a direct impact upon the performance of the Standby Gas Treatment System (SGTS).

Since it has been determined that the total secondary containment inleakage flow remains within the design and licensing basis limits for the affected systems, there is no impact upon system performance as assumed in applicable accident analyses. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR, is unaffected.

- II. No. The lack of isolation in the floor drain headers represents a passive leakage path to secondary containment, which is similar to the other leakage paths associated with the structure (i.e., doors, penetrations, closed dampers, etc.). Since the total leakage, including that associated with the subject drains, remains within design and Technical Specification limits, the systems required to support secondary containment and process fission products will be unaffected. No changes in failure modes, accident initiators, or response to normal, transient or accident conditions will occur as a result of the inleakage. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the SAR is not created.

- III. No. The acceptance limits that form the licensing basis for Technical Specification 3.6.4.1, 'Secondary Containment', are identified in FSAR Section 6.2.3.2.1, 'Secondary Containment Design'.

The results of surveillance tests, combined with the calculated drain header inleakage flows, confirm that total inleakage flow into secondary containment will remain below the design basis limit of 100% volume change per day. Also, since the total inleakage flow remains below the design limit, the secondary containment drawdown time will also remain below the design limit. Therefore, the margin of safety as defined in the basis for Technical Specification 3.6.4.1 is unchanged.

SER NO: 01-229

CROSS REFERENCE: NL-99-092, Unit 1

DESCRIPTION OF CHANGE:

TP-106-002 provides the necessary guidance and work group coordination to safely de-energize Division II Engineered Safequart System Motor Control Centers (ESS), Motor Control Centers (MCC's) 1B246, 1B247 and 0B146 to replace solid state trip devices (Gray Boxes) in Load Center circuit breakers 1B24021, 1B24022 and 1B24023 with Unit 1 Reactor in Mode 4 or 5 and Unit 2 Reactor in any Mode of operation. Steps in this TP result in the following equipment alignments before MCC 1B246, 1B247 and 0B146 are de-energized:

SUMMARY:

- I. No. The equipment required for fuel movement is available and the power to this equipment is not removed during performance of this TP. AC power is removed from isolation dampers and valves. This does not result in the movement of isolation dampers or isolation valves except HD-07543B, which has been placed in its safety-related position (gagged closed). There is sufficient equipment available to meet the Technical Specifications/Technical Requirements Manual requirements or the appropriate LCO/TRO Action Statements have been entered when MCC 1B246, 1B247 and 0B146 are de-energized. There is no Division I equipment supplied from MCC 1B246, 1B247 and 0B146. De-energizing MCC 1B246, 1B247 and 0B146 does not impact operation of Division I equipment. Therefore performance of this TP does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.
- II. No. Performance of TP-106-002 de-energizes MCC 1B246, 1B247 and 0B146. This is less significant than the loss of Division II AC Distribution System that has been analyzed in the FSAR. Loss of 1B246, 1B247 and 0B146 does not prevent the rest of the plant electrical system from performing its design safety function as described in FSAR Section 8.3. The equipment required for fuel movement is also operable or has been placed in its safety-related position (HD-075436 gagged closed). There are no new mechanisms for failures to prevent proper protective action at the system level when required during performance of TP-106-002. De-energizing 1B246, 1B247 and 0B146 causes the loss of common equipment that results in the need to enter LCO/TRO Action Statements for Unit 2. The reactor operators ability to maintain Unit I in Modes 4 or Mode 5 and Unit 2 in Modes 1, 2, 3 is not degraded since the safety systems/components required in these modes are operable or the appropriate LCO/TRO Action Statements have been entered. Therefore TP-106-002 does not create a possibility for an accident or malfunction of a different type than evaluated previously in the SAR.

- III. No. The Technical Specification Bases for Electric Power Systems, Section B3.8 states that the AC electrical power sources are designed to provide sufficient capacity, capability, redundancy and reliability to ensure the availability of necessary power to Engineered Safety Features systems so that the fuel, reactor coolant system and containment design limits are not exceeded. Also, power must be available to maintain the facility in shutdown or refuel conditions for extended periods and sufficient instrumentation/control equipment must be operable for monitoring and maintaining the unit status. The Technical Specifications/Technical Requirements Manual requirements for the Unit 1 affected systems in Mode 4 and Mode 5 and the Unit 2 affected systems in Mode 1, 2, 3 are satisfied or the appropriate LCO/TRO Action Statements have been entered. The equipment required for fuel movement is operable or has been placed in its safety-related position (HD-07543B gagged closed) when MCC 1B246, 1B247 and 0B146 are deenergized. Therefore, the margin of safety as defined in the bases for any technical specification is not reduced.

SER NO: 01-230

CROSS REFERENCE: DCP 214698, Unit 2

DESCRIPTION OF CHANGE:

The proposed action is to add, replace or relocate fire detectors in order to provide the appropriate level of compliance of the existing fire detection system in specific areas of Fire Zones 2-2A, 2-3B-N, 2-3C-W, 2-5A-N and 2-6A.

SUMMARY:

- I. No. The proposed actions do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR. There are no impacts on equipment important to safety. The function of the fire detection system affected by the proposed action does not change. Appendix R safe shutdown can be achieved and maintained for postulated fires in any plant area.
- II. No. The proposed action did not identify a postulated initiating event which would create the possibility of an accident of a different type. The qualification and installation program compliance of the fire barrier system precludes the possibility of a malfunction of a different type. There were no new scenarios that could be postulated that would create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.
- III. No. The proposed action does not affect the operability requirements of any safety related system component as governed by Technical Specification or Technical Requirements Manual. The margin of safety as defined in the basis of the Technical Specification or Technical Requirements Manual is not reduced by the proposed action. A Technical Requirements Manual change to Table 3.7.3.8-1 is required to identify new and relocated fire detectors.

SER NO: 01-231

CROSS REFERENCE: NL-00-011, Unit 1 and 2

DESCRIPTION OF CHANGE:

This change evaluates effects of closing a Control Rod Drive (CRD) pump minimum flow isolation valve, in order to increase drive water flow and cooling water flow to normal values, in response to degraded conditions.

SUMMARY:

- I. No. The proposed action removes an equipment protection feature on a non-safety grade piece of equipment. This action will not affect operation of any safety equipment. Hence, it does not increase the probability of occurrence or the consequences of an accident.

There is a small chance that the action could worsen an existing degraded condition on the 1A discharge check valve, creating a need to operate the 1B CRD pump. Subsequent failure of the 1B CRD pump would require the manual shutdown of the unit. While this is considered unlikely, it is a finite possibility. The action will not affect the ability of the operator to shutdown the unit normally, within design basis conditions.
- II. No. The proposed action will not affect the safety function of any system. It does not create a new initiating event. Hence, it will not create the possibility for an accident or malfunction of a different type than any previously evaluated in the FSAR.
- III. No. The Technical Specifications Bases were reviewed. There is no requirement for or reference to the CRD pump minimum flow function. The minimum flow serves no safety function. Hence, the CRD Pump Minimum Flow lines are not included in the bases, and closing a valve in this line does not reduce the margin of safety.

SER NO: 01-232

CROSS REFERENCE: NL-99-082, Rev. 3, Units 1 and 2

DESCRIPTION OF CHANGE:

The proposed change is to revise plant procedures to manually position temperature control valves TV-01124A through E in the full open (de-energized position).

SUMMARY:

- I. No. The proposed change will restore the Emergency Service Water (ESW) System and Diesel Generators to a configuration that is similar to their original design. Temperature control valves TV-01124A through E did not exist in the original plant design. It is concluded that temperature control valves TV-01124A through E are maintained operable, even though they are not needed to minimize tin smearing, as was originally thought. It is concluded that disabling the temperature control for TV-01124A-E will not prevent the diesel generators from performing their intended function, nor will it contribute to increasing the probability of a diesel failure. The proposed change does not increase the consequences of an accident or malfunction. It is equivalent to the original design of the plant, in terms of intake air cooling. Therefore, the proposed change does not increase the probability of design basis accidents, radiological consequences of an accident, or failure modes of equipment important to safety.
- II. No. The proposed change does not introduce any new failure mechanism. Failure of a diesel generator has been previously evaluated. The design of the temperature control valve is to fail open. Cooler intake air temperatures could lead to slightly more condensation being entrained in the inlet air carried into the cylinders. However, this situation is discussed in an NRC SER dated May 11, 1992, with the conclusion that condensation will not cause any significant lubrication oil film degradation or engine damage. In addition, failure of an ESW pump has been previously evaluated. The proposed change will not introduce a generic failure mode, nor will it adversely affect either the operability of the diesels or ability of the diesels to perform their safety function. Therefore, the proposed change does not create the possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. Technical Specification 3.7.2 addresses the ESW System. This section is concerned with providing adequate ESW flow rate. Technical Specifications 3.8.1, 3.8.2, and 3.8.3 are applicable to the Diesel Generators. There is no discussion of either flow rates to the diesel intercoolers or ESW pump minimum flow rates in the Technical Specifications, although the individual pump flow rates are tested in the Station Pump and Valve Testing Program. The Bases for these Technical Specifications were also reviewed. Section 9.2.1 of the SER, NUREG-0776, which addresses ESW, was reviewed. Section 9.6.3.3 of the SER, which addresses diesel engine cooling water, was also reviewed. The proposed change does not affect NUREG-0776. On May 11, 1992, the NRC issued an SER on the emergency diesel generator overpressurization events. The SER noted that an automatic inlet air temperature control system had been installed. The proposed change does not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-233

CROSS REFERENCE: NL-00-009, Unit 1

DESCRIPTION OF CHANGE:

The purpose of the change is to provide instructions to perform a chemical decontamination of the Unit I Reactor Recirculation System to reduce the general radiation fields within the drywell. The change also provides the instructions to perform functions and activities needed to support the decontamination process (e.g. equipment set-up, chemical control, sampling, radwaste disposal, etc.).

SUMMARY:

- I. No. The chemical decontamination of the Unit I Reactor Recirculation System piping will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to the safety, as previously evaluated in the FSAR. The evaluation considered potential effects to the reactor coolant inventory (FSAR 15.6), the input on the 'Reactor' pressure boundary (FSAR 5.2), potential radioactive release from subsystem and components (FSAR 15.7) and physical impacts to the building and structure. The worst possible, event causing loss of reactor coolant would be ejection/seal failure of a plug. This would result in an insignificant loss of reactor coolant from the cavity and have no impact on the ability to maintain adequate core cooling. Since the plugs are not seismically qualified, they could become dislodged during a seismic event. Under these conditions, the reactor pressure boundary would be maintained by closing the Reactor Recirculation System suction and discharge valves. Any potential accidents that could occur are bounded by those previously analyzed in FSAR 15.7.3.
- II. No. The chemical decontamination of the Unit 1 Reactor or Recirculation System piping does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR. The evaluation considered the chemical degradation and effects on the reactor pressure vessel N1 nozzles and N2 nozzle thermal sleeves, the jet pump riser piping, and on all components in the Reactor Recirculation System, the potential for chemical introduction into the Reactor Vessel and associated impacts on core components or the fuel, potential chemical reactions, spills, the impact on the plant electrical distribution system and the impact of a seismic event. The chemical compatibility study for the NP and LOMI chemicals used during this process indicated that they would have a negligible impact on corrosion of the Reactor System and core components. Further, level control during the process will ensure that the chemical levels will not contact the jet pump nozzle plugs to minimize potential for chemical introduction production to the vessel. Chemical reaction studies were performed to ensure that no toxic or hazardous byproducts could be formed from a chemical reaction between any of the decontamination chemicals with other materials that may be found in the drywell. Plant floor drains in the area and the drywell sump will be isolated to prevent spreading of the chemicals into the plant Radwaste System. Spills will be contained and cleaned by the site's Spill Response Team.

- III. No. The chemical decontamination of the Unit 1 Reactor Recirculation System piping does not reduce the margin of safety as defined in the basis for any Technical Specification. Current plant Technical Specifications were reviewed to determine potential impacts. No additional impacts were found, other than those previously evaluated as a result of the Plug Installation and removal process.

SER NO: 01-234

CROSS REFERENCE: DCP 98-3015A, Unit N/A

DESCRIPTION OF CHANGE:

The proposed action is to install a fire barrier upgrade system on selected raceways in Fire Zones 0-24G, 0-25A, 0-25E, 0-28A-1, 0-28A-11, 0-28B-1, 0-28B-11 and 0-28H.

SUMMARY:

- I. No. The proposed actions do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the SAR. The interfacing system evaluations assure the proposed action has no impact on equipment important to safety. The function of the circuits in the raceways affected by the proposed action does not change. The proposed action assures operability of the required Appendix R circuits and prevents inadvertent operation of equipment required during an Appendix R fire in Fire Zones 0-24G, 0-25A, 0-25E, 0-28A-1, 0-28A-11, 0-28B-1, 0-28B-11 or 0-28H. On Elevation 771' of the Control Structure, the Fire Hazards Analysis supports the conclusions that due to the limited potential for a fire and the strict controls placed on transient combustibles the fire barrier upgrade system provides a level of protection equivalent to that intended by 10 CFR Appendix R, Section III.G.2. Appendix R safe shutdown can be achieved and maintained for postulated fires in any plant area including Fire Zones 0-24G, 0-25A, 0-25E, 0-28A-1, 0-28A-11, 0-28B-1, 0-28B-11 or 0-28H.
- II. No. The proposed action did not identify a postulated initiating event which would create the possibility of an accident of a different type. The qualification and installation program compliance of the fire barrier system precludes the possibility of a malfunction of a different type. There were no new scenarios that could be postulated that would create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. The proposed action does not affect the operability requirements of any safety related system component as governed by Technical Specification or Technical Requirements Manual. The alternate fire barrier upgrade system used on portions of certain conduits in the Control Structure Elevation 771' does not result in a change to the Technical Specifications. The margin of safety as defined in the basis of the Technical Specification or Technical Requirements Manual is not reduced by the proposed action.

SER NO: 01-235

CROSS REFERENCE: NL-00-014, Unit 1

DESCRIPTION OF CHANGE:

The built-up roof system on the Unit 1 side of the turbine building is to be replaced during the Unit 1 – 11th Refueling and Inspection Outage.

SUMMARY:

- I. No. The turbine building roof replacement project does not increase the probability or consequences of an accident or malfunction of equipment important to safety as previously evaluated in the SAR as follows. The roof system and the turbine building HVAC perform no safety related functions. Removal of the built-up roof system does not affect the vapor barrier or air seal design features of the roof deck system. The roof deck will remain intact. There will be insulation-related mechanical fastener holes that will be filled and restored prior to the end of each shift. The roof will be sectioned off into grid blocks which will be sampled by Health Physics. Once cleared, the blocks will be worked, one at a time, until the whole area is complete. The design features of the turbine building HVAC system will remain unaffected by roof replacement. These design features are discussed in FSAR Sections 9.4.4 and 12.3.3. These work practices and design features preclude the postulated occurrence of an unmonitored radiological release.
- II. No. The turbine building roof system and turbine building HVAC system perform no safety-related functions. Removal of the built-up roof system does not affect the two primary design features of the turbine building HVAC system. These features are to: a) maintain the turbine building at less than atmospheric pressure, and b) provide assurance that the flow of air within the building is from areas of low contamination to areas of higher contamination. The design features of the turbine building HVAC system preclude the postulated occurrence of an unmonitored radiological release. These design features are discussed in FSAR Section 9.4.4.3 and 12.3.3. Therefore, the roof replacement does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. The turbine building roof replacement project does not reduce the margin of safety as defined in the basis for any Technical Specification. The turbine building roof system and turbine building HVAC system perform no safety-related functions. Roof work will be performed in a manner that minimizes the size and time of holes in the roof such that the size is less than the area of one open smoke vent and the duration is less than a shift. This will assure that the design features of the turbine building HVAC system remain unaffected. Other sound station work practices include: a) staging material and equipment at ground level locations where they adhere to line and equipment clearances and do not interfere with other station activity, b) minimizing fire risk by maintaining coal tar pitch kettle and ground level instead of roof, c) training of roofing personnel in radiological considerations and station programs and procedures, and d) maintaining management oversight of project.

SER NO: 01-236

CROSS REFERENCE: DCPs 99-3063, 99-3064, 99-3073, 99-3074, Units 1 and 2

DESCRIPTION OF CHANGE:

These DCP's will replace existing Tracor Westronics M11 E Control Room recorders with Yokogawa digital programmable type recorders. Recorders being replaced are TRS-B31-1R625, TRS-B31-1R626, TRSH-B31-1R601, TRS-B21-1R614, TRS-B31-2R625, TRS-B31-2R626, TRSH-B31-2R601 and TRS-B21-2R614 located in 1C614 and 2C614. High Pressure Coolant Injection (HPCI) Turbine Vibration monitoring equipment VI-15662, VI-25662, VR-15662 and VR-25662 which is not being utilized will be removed from 1C614 and 2C614,

SUMMARY:

- I. No. The proposed modifications do not affect any of the postulated initiating events for which transients or anticipated operational occurrences and accident conditions were analyzed (Ref. FSAR Chapter 6 and Chapter 15, FPRR, LDCNs, Design Assessment Report, Current Reload Analysis and NUREG-0776). It does not create a condition that could propagate an accident. The proposed change does not involve a precursor of, or contribute to, any evaluated accidents involving offsite dose. These changes do not adversely affect any safety-related plant systems or components. These changes have no adverse effect on accident scenarios and do not increase the potential of a malfunction of equipment important to safety. These modifications will not increase challenges to safety systems assumed to function for any accident analysis. Therefore, these changes have no effect on any accident scenario or malfunction of equipment important to safety, and have no effect on radiological consequences.

The proposed modifications do not affect the ability of M-G Sets, Reactor Recirc. Pumps or Safety/Relief valves recorders to function. The proposed change will allow operators to continue to monitor and record all of the existing variables directly on the replacement recorders. In addition, the replacement recorders will continue to be powered from the existing 120 VAC Instrument Distribution panels. The removal of the HPCI Turbine Vibration monitoring equipment will eliminate unused equipment, free Control Room panel space, and reduce load on the 120 VAC Instrument Distribution panels. Therefore, the proposed modifications do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR.

- II. No. The primary purpose of the temperature recorders is to display variables that provide information required by the Control Room operators to monitor equipment temperatures. The recorders present historical trends directly on the recorder video display screen. The temperature recorders associated with the M-G Sets and Recirculation Pumps and

Motors allow the operator to monitor for degrading conditions, while the recorders associated with the Safety/Relief valves provide data regarding positive action of steam flow. This information supports the operator to monitor for degrading conditions and taking appropriate action to avoid damage to equipment. The HPCI Turbine Vibration

monitoring equipment is no longer utilized as the vibration readings taken during the HPCI Flow Verification testing are done locally utilizing newly installed sensors.

The proposed modifications do not adversely impact the dynamic qualification of the existing panels and do not adversely affect their power sources. A failure of the new recorders produces the same results as failure of the existing recorders. Therefore, the proposed change does not create the possibility of an accident or malfunction of a different type than any evaluated previously in the FSAR, FPRR, and all open LDCNs, Design Assessment Report, Current Reload Analysis and NUREG-0776.

- III. No. Tech Specification section 3.4 and Technical Requirements Manual were reviewed. This section discusses the requirements for Reactor Coolant Systems. The proposed modifications have no impact on this Technical Requirement, since no circuit or equipment modifications affect the associated instrumentation channels. Also, there is no impact on the electrical power systems, Ref. Section 3.8, from these proposed changes. The changes do not affect the operational or surveillance requirements of any Technical Specifications or Technical Requirements. Therefore, the proposed changes do not affect the margin of safety as delineated in the Technical Specifications or Technical Requirements.

SER NO: 01-237

CROSS REFERENCE: NL-00-019, Units 1 and 2

DESCRIPTION OF CHANGE:

This evaluation pertains to vendor supplied equipment used to test U-1 and U-2 Reactor Pressure Vessel (RPV) Core Shrouds for structural integral by Eddy Current and Ultrasonic Testing during Mode 5

SUMMARY:

- I. No. The proposed testing does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR. Two of the accidents feasible are Equipment Handling and Decrease in Reactor Core Coolant Flow Rate. Utilization of the equipment is bounded by the analysis of these two accidents in the FSAR after review of sections 15.7.4 and 15.3 respectively.
- II. No. The proposed testing does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR. The only accidents or malfunctions credible for the conduct of this test are Decrease of Reactor Coolant Flow and Radioactive Release from a Subsystem or Component due to an equipment handling accident. Both these accidents are bounded during the conduct of the test after review of sections 15.7.4 and 15.3 of the FSAR.
- III. No. The proposed action does not reduce the margin of safety as defined in the basis for the Technical Specification because this is a passive test having no effect on the safety limits, limiting safety system settings, limiting conditions of operation or operation at power. This conclusion was formed after reviewing section 3.4 of the Technical Specification Bases.

SER NO: 01-238

CROSS REFERENCE: NL-00-013, Unit 1 and 2

DESCRIPTION OF CHANGE:

This change corrects the Unit 1 & 2 TS Bases Section 3.8.1 LCO by revising the following sentence: "If no OPERABLE offsite circuit is capable of supplying any of the 4.16kV ESS Buses, provided that the associated DG is capable of supplying the affected 4.16kV ESS Bus and the offsite circuits otherwise meet the above requirements, one offsite source shall be declared inoperable."

SUMMARY:

- I. No. The proposed action revises Technical Specification Bases 3.8.1 to remove the requirement to have the Diesel Generator capable of supplying the 4.16kV ESS Bus that has two offsite feeder breakers inoperable. The Technical Specification Bases states that both offsite feeder breakers to the same 4.16kV Engineered Safeguard System (ESS) Bus can be inoperable, however, one of the offsite circuits must be declared inoperable. This results in requiring the affected Unit to enter LCO 3.8.1 Action A. With one offsite circuit inoperable and one 4.16kV ESS Bus with no operable offsite circuits concurrent with the loss of all onsite AC supplies (Design Basis), at least three of the four 4.16kV ESS Buses are operable, thus, the design basis for the offsite supplies is met. Meeting the design basis is not dependent upon the Diesel Generator being capable of supplying the affected 4.16kV ESS Bus. Entrance into LCO 3.8.1 Action A.2 assures that the safety functions associated with the equipment connected to the 4.16kV ESS Bus, with no offsite circuits operable, can still be performed by requiring verification that the redundant equipment supplied from the other 4.16kV ESS Buses is operable. This ensures that three of the four load groups are operable. This meets the design basis for the 4.16kV ESS Buses. Meeting the design basis is not dependent upon the Diesel Generator being capable of supplying the affected 4.16kV ESS Bus. Therefore, the frequency of accidents, as described in Chapter 15 of the FSAR, are unchanged and the consequences of an accident or malfunction of equipment does not increase by the proposed action.
- II. No. Entrance into LCO 3.8.1 Action A.2 assures that the safety functions associated with the equipment connected to the 4.16kV ESS Bus, with no offsite circuits operable, can still be performed by requiring verification that the redundant equipment supplied from the other 4.16kV ESS Buses is operable. This ensures that three of the four load groups are operable. This meets the design basis for the 4.16kV ESS Buses. Meeting the design basis is not dependent upon the Diesel Generator being capable of supplying the affected 4.16kV ESS Bus. There are no new mechanisms for failures to prevent proper protective action at the system level when required.

All consequences of a postulated loss of offsite power and/or a 4.16kV ESS Bus are bounded by the analysis previously analyzed in the FSAR. Therefore, the proposed action does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.

- III. No. The applicable Technical Specifications are LCO 3.8.1, LCO 3.8.7 (Operating) and LCO 3.8.8 (Shutdown). The proposed action does not change any protective action at the system level, any process setpoints or any calculations used in establishing a margin of safety as defined in the Bases section of these Technical Specifications. The change does not change any of the input assumptions for any of the accident analyses in the FSAR or any actions required by the Technical Specifications. The NRC in the SER for the License Amendments (178 for Unit 1 and 151 for Unit 2) which approved the Technical Specifications revision for the Improved Technical Specifications did not approve Condition A assuming that the diesel generator was available. Therefore, deleting the statement that the diesel generator is available does not reduce the margin of safety, as defined in the bases for any technical specification.

SER NO: 01-239

CROSS REFERENCE: NL-00-017, Units 1 and 2

DESCRIPTION OF CHANGE:

The purpose of this evaluation is to determine whether or not the General Electric (GE) Control Rod Drive (CRD) Mechanism Procedure, CRD-007 is safe for use at the Susquehanna Steam Electric Station (SSES).

SUMMARY:

- I. No. In Mode 5, the large capacity of the CRD flange bolts (two bolts diametrically opposed and snug tight) is sufficient to ensure the CRD maintains an adequate boundary to prevent draining the reactor vessel. Also, the control blade backseat provides an additional barrier (only barrier during a CRD exchange) to prevent an unrecoverable leak path from being created. Verification of the control blade backseat is an integral part of the CRD-007 procedure. The GE SLDES machine will be used to remove and install control rod drives. The SLDES machine is functionally equivalent to the NES machine typically used to replace control rod drives at SSES. Both machines are non-safety related. Both designs incorporate air as the motive force to remove and install a CRD. Both designs are equipped with adequate features to prevent uncontrolled movement upon loss of air. Thus, the proposed action will not increase the probability or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR.
- II. No. In Mode 5, the large capacity of the CRD flange bolts (two bolts diametrically opposed and snug tight) is sufficient to ensure the CRD maintains an adequate boundary to prevent draining the reactor vessel. In the unlikely event that one bolt were to fail, the control blade backseat would provide a sufficient barrier to preclude an unrecoverable leak path from being created. The capacity of the remaining bolt will maintain sufficient integrity between the CRD flange and the CRD housing.

If the control blade were to fail to backseat during a CRD exchange, the control rod drive would be reinserted into CRD housing. An evaluation of all possible leakage paths estimated a maximum leakage rate of 270 gpm. This leakage rate is well within the makeup capacity of the Emergency Core Cooling System (ECCS) pumps. Should the ECCS pumps not be required to be operable, sufficient time exists for operations to recover from such an event.

The GE SLDES machine will be used to remove and install control rod drives. The SLIDES machine is functionally equivalent to the NES machine typically used to replace control rod drives at SSES. Both machines are non-safety related. Both designs incorporate air as the motive force to remove and install a CRD. Both designs provide sufficient protection against inadvertently dropping a control rod drive. In the unlikely event that a control rod drive were dropped, the control blade backseat would preclude the creation of an unrecoverable leak path in the reactor vessel.

Thus, the proposed action does not create the possibility of an accident or malfunction of a different type than previously evaluated in the FSAR.

- III. No. TS B3.10.5 and TS B3.10.6 describe the basis for allowing the requirements of certain Limiting Conditions for Operation to be suspended in order to withdraw and remove a single CRD and multiple control rods / control rod drives during refueling. Alternate means of protecting the core are provided in these Special Operations. Approved Station procedures will ensure the requirements of TS 3.10.5 and / or TS 3.10.6 are met and thus preclude an inadvertent criticality event. The CRD-007 procedure will not alter any of these requirements. Thus, the margin of safety as defined in TS B3.10.5 and TS B3.10.6 will not be reduced.

SER NO: 01-240

CROSS REFERENCE: DCP 236816, Unit 1

DESCRIPTION OF CHANGE:

This evaluation discusses the safety aspects associated with the removal of Motor Operated Valve (MOV) compartment space heaters which have been de-energized by various modifications and de-energizing and removal of the remaining MOVs space heaters in environmentally controlled areas.

SUMMARY:

- I. No. The design change provided by this modification will be in accordance with the applicable design criteria and operational requirements as specified in the SAR and all applicable commitments will be satisfied; therefore, no new accident precursors will be created. The design will not impact the operability of the MOVs and they will continue to perform their safety-related functions. No new failures will be created by the action taken via this modification. Therefore, the proposed action does not create a possibility for an accident or malfunction of a different type than any evaluated in the SAR. There are no new radiological pathways created and no radiological increase from existing pathways will be caused by this modification as a result of an accident or a malfunction of equipment. Chapters 6 and 15 of the FSAR were reviewed in making this determination.
- II. No. The design change provided by this modification will be in accordance with the applicable design criteria and operation requirements as specified in the SAR and all applicable commitments will be satisfied; therefore, no new accident precursors will be created. This design will ensure the operability of the MOVs. The MOVs will continue to perform their safety functions as required by Technical Specifications. No new equipment failure modes will be created by the actions taken via this modification. Chapters 6 and 15 of the SAR were reviewed in making this determination. Therefore, the proposed actions do not create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. The removal or de-energizing of MOV compartment space heaters will be in accordance with the applicable design criteria and operation requirements as specified in the FSAR. All applicable commitments will be satisfied. The modification will not affect the operability or any safety function of the MOVs. The MOVs will continue to perform their safety function as required by Technical Specifications. Therefore, this modification does not reduce any margin of safety which serves as the basis for any Technical Specification or Technical Requirement.

SER NO: 01-241

CROSS REFERENCE: DCP 99-3069, 99-3070, Units 1 and 2

DESCRIPTION OF CHANGE: Control Room Area Radiation Recorder Replacement

SUMMARY:

- I. No. The proposed action does not affect any of the postulated initiating events for which transients or anticipated operational occurrences and accident conditions were analyzed. (Reference Chapter 12.3.4.1 and Chapter 15.) The proposed action does not involve a precursor of, or contribute to, any evaluated accidents involving offsite dose. This change does not adversely affect any safety-related plant systems or components. This change has no adverse effect on accident scenarios and does not increase the potential of a malfunction of equipment important to safety. These modifications will not increase challenges to safety systems assumed to function for any accident analysis. Therefore, this change has no effect on any accident scenario or malfunction of equipment important to safety, and has no effect on radiological consequences.

The proposed action does not affect the ability of Area Radiation Monitoring Instrumentation to function. In addition, the replacement recorders will continue to be powered from the existing 120VAC non-Class IIE Instrument AC Power Supply distribution panels. Therefore, the proposed change does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the SAR.

- II. No. The Area Radiation Recorders record data from 84 radiation monitors and display trends of that data. They provide the control room operators long-term surveillance of area radiation levels and enable monitoring the accessibility to various areas in secondary containment. The proposed action does not affect the ability of any of the recorders or their associated area monitors to perform their function in support of plant operation. The existing non-Class 1E Instrument AC power supplies will be used. Electrical separation is maintained in accordance with FSAR Chapter 8.3.1.11.4. The proposed modifications do not adversely impact the dynamic qualifications of the existing panels or adjacent control panels and do not adversely affect their power sources. The replacement recorders use a digital microprocessor with software tested to the requirements of IEEE 7-4.3.2. They have also been tested for radio frequency and electromagnetic interference and certified to meet EMI/RFI testing based on EPRI TR-102323 guidelines. Failure of a recorder is not an initiating event for which transients or anticipated operational occurrences were analyzed. Therefore, the proposed change does not create the possibility of an accident or malfunction of a different type than any evaluated previously in the SAR. (Reference FSAR Chapter 8.3.1.8, Chapter 12.3.4, and Chapter 15.)
- III. No. Replacement of the Area Radiation Recorders has no impact on Technical Specifications. The recorders receive input from the New Fuel Storage Vault and the Spent Fuel Storage Pool radiation monitors. These monitors are required to be operable by TR 3.3.1 when spent fuel is in the spent fuel pool and when new fuel is in the new fuel storage vault. The monitors detect a criticality event and initiate a local alarm and an

alarm in the Main Control Room. The recorders do not initiate alarms. The proposed action has no impact on this requirement, since no circuit or equipment modifications adversely affect the associated instrumentation. The proposed action does not affect the margin of safety for any Technical Specification or Technical Requirement above.

SER NO: 01-242

CROSS REFERENCE: NL-98-112, Unit 1 and 2

DESCRIPTION OF CHANGE:

This change revises the wording in the Technical Specification Bases section B 3.6.1.5 to reflect a change in the method of calculating average drywell air temperature.

SUMMARY:

- I. No. This proposal increases the accuracy in the determination of average drywell air temperature. By using additional data points, a more representative measurement of temperature in the drywell is gained. This change will not affect any safety related equipment or situations analyzed in the SAR. No equipment will be added as a result of this change or operated in any new manner. Sensor readings which are currently discarded will be factored into the calculation of the average temperature. The design basis of primary containment will be unchanged and no increase in drywell temperature above the TS 3.6.1.5 requirement will result from this change in calculational methods. Therefore, the change does not increase the probability of occurrence or the consequence of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.
- II. No. The change in the method of calculating average drywell air temperature does not affect the operation of any existing systems. The temperature measuring loop is not affected by this change. No increase in actual drywell temperature above TS 3.6.1.5 requirements will result, and no new failure modes are being introduced by this proposal. Therefore, this change does not create the possibility for an accident or malfunction of a different type than evaluated previously in the SAR.
- III. No. As discussed in the bases for TS 3.6.1.5, the worst case initial average drywell air temperature was assumed (based on General Electric's operating experience) to be 135 degrees F. In the event of a Design Basis Accident (DBA), with an initial drywell average air temperature less than or equal to that limit, the resultant peak accident temperature is maintained below the drywell design temperature. As a result, the ability of primary containment to perform its design function is ensured. The proposed change will not allow average drywell temperature to increase above the LCO limit. It will instead increase the accuracy of the measurement. This proposal will not result in underestimating average drywell air temperature at any time. Therefore, this change will not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-243

CROSS REFERENCE: NL-00-001, Unit 1

DESCRIPTION OF CHANGE:

The proposed action is the change to the Unit 1 reactor core loading to support Cycle 12 operation. In addition, this safety evaluation addresses the implementation of GE Marathon control blades, which is a new design for SSES.

SUMMARY:

- I. No. The applicable sections of the FSAR related to the core loading and the licensing events that have been evaluated for U1C12 are Chapters 4, 5, 6, 9, and 15.

The U1C12 core loading consists of 1) 256 fresh SPC ATRIUM™-10 fuel assemblies, 2) 308 once-burned SPC ATRIUM™-10 fuel assemblies, and 3) 200 twice-burned SPC 9x9-2 fuel assemblies.

All fuel in the U1C12 core was determined to meet the required mechanical, thermal-hydraulic, and nuclear design criteria, and therefore the fuel is fully capable of performing its intended design function. The U1C12 core loading does not directly or indirectly affect the functioning, performance, reliability, response time, power supplies, cooling, or lubrication of any plant systems. The GE Marathon control blades were determined to be directly interchangeable with the existing GE Duralife 160C control blades currently in use at SSES. With the exception of core stability, for which changes in the core loading itself can influence the probability of occurrence of core instabilities, the core loading and the use of GE Marathon control blades will not affect the failure mode of any plant system or component, nor will it affect the probability of occurrence of any transient or accident initiating event.

PPL has also committed to a long term method for addressing core stability through its responses to NRC Generic Letter 94-02 (References 12 and 13), referred to as the Oscillation Power Range Monitor (OPRM). It is expected that this OPRM trip function will be activated during U1C12. U1C12 specific reload analyses were performed by PPL using NRC approved methodology. As required by the NRC approved methodology, these analyses demonstrate that the OPRM will trip the plant (if needed) such that, in the event of an instability, a high confidence exists that the MCPR Safety Limit will not be violated for anticipated oscillations.

Therefore, there is no increase in either the probability or consequences of an instability event as a result of the U1C12 core loading.

Based on the above discussion, the Unit 1 Cycle 12 core loading and use of GE Marathon control blades will not increase the probability of occurrence of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.

- II. No. The above described transients, accidents, and reactivity related assessments have been evaluated for U1C12 (covering the ATRIUM™-10 and 9x9-2 fuel, including one bypass valve inoperable, and use of GE Marathon control blades) to assure that applicable acceptance criteria are met.

Additional analyses and evaluations addressed the impact of ATRIUM™ -10 fuel and the 24 month cycle on decay heat, the radioactive source terms, Heavy Loads (movement of heavy loads over irradiated fuel), Post-LOCA hydrogen generation (hydrogen recombiners), Equipment Qualification (In-Containment Emergency Equipment), LOCA electrical time lines (electrical supply), Suppression Pool Heat Load, Spray Pond Analysis, Spent Fuel Pool Boiloff Analysis, Public and Occupational Dose, ATVVS, Recirculation Pump Performance, LOCA offsite dose, the Emergency Plan, and the EOPs. The results of these analyses demonstrated that the applicable acceptance criteria for these evaluations are met for U1C12.

Therefore the proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.

- III. No. The applicable Technical Specification Sections include 2.1, 3.1, 3.2, 3.4. 1, and 5.6.5.

The U1C12 core loading and associated Maximum Average Planar Linear Heat Generation Rate (MAPLHGR), Linear Heat Generation Rate (LHGR), and Minimum Critical Power Ration (MCPR) operating limits do not jeopardize or degrade the function or operation of any plant system or component governed by Technical Specifications. Because the GE Marathon control blades are identical in form, fit and function to the blades they replace, their use does not jeopardize or degrade the function or operation of any plant system or component governed by Technical Specifications. The U1C12 analysis provides U1C12 operating limits for the SPC ATRIUM™-10 and 9x9-2 assemblies that will maintain an equivalent margin of safety as currently defined in the basis of the applicable Technical Specification sections.

All transients, accidents, and reactivity related assessments have been evaluated for U1C12 (covering the ATRIUM™ 10 and 9x9-2 fuel, including one bypass valve inoperable, and use of GE Marathon control blades) to assure that applicable acceptance criteria are met.

Therefore, this change does not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-244

CROSS REFERENCE: DCP 214699, Unit N/A

DESCRIPTION OF CHANGE:

The proposed action adds and replaces fire detectors to provide the appropriate level of compliance of the existing fire detection system for specific areas of Fire Zone 0-41A, 0-41B, 0-41C and 0-41D.

SUMMARY:

- I. No. The proposed actions do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the SAR. There are no impacts on equipment important to safety. The function of the fire detection system affected by the proposed action does not change. Appendix R safe shutdown can be achieved and maintained for postulated fires in any plant area.
- II. No. The proposed action did not identify a postulated initiating event which would create the possibility of an accident of a different type. There were no new scenarios that could be postulated that would create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. The proposed action does not affect the operability requirements of any safety related system component as governed by Technical Specification or Technical Requirements Manual. The margin of safety as defined in the basis of the Technical Specification or Technical Requirements Manual is not reduced by the proposed action. A Technical Requirements Manual change to Table 3.7.3.8-1 is required to identify new fire detectors.

SER NO: 01-245

CROSS REFERENCE: NL-97-076, Unit 1 and 2

DESCRIPTION OF CHANGE:

The proposed action is to designate the north end portion of the floor in Fire Zone 2-5H (Room II-508) on Elevation 749'-1" of the Unit 2 Reactor Building as three hour rated.

SUMMARY:

- I. No. The proposed actions do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR. There are no impacts on equipment important to safety. The function of the floor in Fire Zone 2-5H affected by the proposed action does not change. Appendix R safe shutdown can be achieved and maintained for postulated fires in any plant area.
- II. No. The proposed action did not identify a postulated initiating event which would create the possibility of an accident of a different type. There were no new scenarios that could be postulated that would create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.
- III. No. The proposed action does not affect the operability requirements of any safety related system component as governed by Technical Specification or Technical Requirements Manual. The margin of safety as defined in the basis of the Technical Specification or Technical Requirements Manual is not reduced by the proposed action.

SER NO: 01-246

CROSS REFERENCE: NL-99-049, Unit 2

DESCRIPTION OF CHANGE:

The proposed action is to change the Safe Shutdown Path of Fire Zone 2-4G from Path 1 to Path 3 and to change Fire Zone 2-4G from Fire Area R-2B to R-2A.

SUMMARY:

- I. No. The proposed actions do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR. There are no impacts on equipment important to safety. With the proposed action, the north wall of Fire Zone 2-4G becomes the fire rated barrier between Fire Areas R-2A and R-2B. The north wall of Fire Zone 2-4G already has a fire barrier rating of three hours so that the proposed action ensures compliance with 10 CFR 50, Appendix R Section III.G.2. Appendix R safe shutdown can be achieved and maintained for postulated fires in any plant area.
- II. No. The proposed action did not identify a postulated initiating event which would create the possibility of an accident of a different type. There were no new scenarios that could be postulated that would create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.
- III. No. The proposed action does not affect the operability requirements of any safety related system component as governed by Technical Specification or Technical Requirements Manual. The margin of safety as defined in the basis of the Technical Specification or Technical Requirements Manual is not reduced by the proposed action.

SER NO: 01-247

CROSS REFERENCE: NL-00-015, Unit 1 and 2

DESCRIPTION OF CHANGE:

This evaluation addresses the impact of the missing fuel rod grapple encoder drive chain link that is assumed to be lost within the vessel or systems attached to the vessel.

SUMMARY:

- I. No. The missing chain link does not increase the probability of occurrence of an accident or malfunction of equipment important to safety as previously evaluated in the SAR. The missing chain link lacks sufficient size, geometry, and strength to adversely affect those components analyzed in the SAR to initiate an accident or malfunction. The missing chain link will not adversely affect those systems/structures/components which it can contact (i. e., the reactor coolant pressure boundary, reactor internals control rods, control rod drives, containment isolation valves, and High Pressure Coolant Inspection HPCI system). The chain link could cause a fuel rod fretting failure (i. e., a defect in the cladding), however, FSAR Section 11.1.1.1 recognizes that minuscule fuel defects are anticipated. No components are adversely affected. FSAR Chapters 1, 4, 5, 6, 7, 11, and 15 were reviewed to reach this conclusion.
- II. No. The missing chain link is incapable of damaging any components important to safety or preventing any component important to safety from performing its safety function. Hence, the missing parts cannot create the possibility of an accident or malfunction of a different type than any previously reviewed in the SAR. FSAR Chapters 1, 4, 5, 6, 7, 11, and 15 were reviewed to reach this conclusion.
- III. No. The missing chain link is incapable of damaging any component important to safety or preventing any component important to safety from performing its intended safety function. The missing chain link could cause a fuel rod fretting failure (i. e., a defect in the cladding), however, FSAR Section 11.1.1.1 recognizes that minuscule defects are anticipated and can release small amounts of noble radiogas isotopes to the coolant, such as during Unit 2 Cycle 3 operation. Based on the Unit 2 Cycle 3 operating experience with a fuel rod cladding fretting failure, the maximum amount of noble gasses released to the coolant (i.e., <2,000 $\mu\text{Ci/sec}$) was only a very small fraction of the Technical Specification release rate (330,000 $\mu\text{Ci/sec}$). Hence, the missing chain link will not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-248

CROSS REFERENCE: NL-00-020, Unit 1 and 2

DESCRIPTION OF CHANGE:

This evaluation addresses the impact of aluminum shavings that are assumed to be lost within the vessel or systems attached to the vessel.

SUMMARY:

- I. No. The aluminum shavings do not increase the probability of occurrence of an accident or malfunction of equipment important to safety as previously evaluated in the SAR. The aluminum shavings lack sufficient size, geometry, and strength to adversely affect those components analyzed in the SAR to initiate an accident or malfunction. The aluminum shavings will not adversely affect those systems/structures/components which it can contact (i. e., the reactor coolant pressure boundary, fuel assemblies, reactor internals, control rods, control rod drives, containment isolation valves, and connected systems). None of these components are adversely affected. FSAR Chapters 1, 4, 5, 6, 7, 11, and 15 were reviewed to reach this conclusion.
- II. No. The aluminum shavings are incapable of damaging any components important to safety or preventing any component important to safety from performing its safety function. Hence, the aluminum shavings cannot create the possibility of an accident or malfunction of a different type than any previously reviewed in the SAR. FSAR Chapters 1, 4, 5, 6, 7, 11, and 15 were reviewed to reach this conclusion.
- III. No. The aluminum shavings are incapable of damaging any component important to safety or preventing any component important to safety from performing its intended safety function. Hence, the aluminum shavings will not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-249

CROSS REFERENCE: NL-00-021, Unit 1

DESCRIPTION OF CHANGE:

This evaluation reviews the repair plan developed as a compensatory action for the degraded condition of the #3 Feedwater Heater Repairs.

SUMMARY:

- I. No. The probability of a decrease in reactor coolant temperature is not increased. The operation with the additional tubes plugged in feedwater heaters 1EI03A-C will not significantly change the temperature of the feedwater supplied to the reactor pressure vessel. Therefore, there are no systems or components that are affected by the proposed action. No new failure modes are introduced by the proposed action to operate with the repaired feedwater heaters. Consequences of loss of feedwater heating events as described in FSAR Section 15.1.1 will not be increased by the proposed action. In addition, the proposed action does not change any system operational or protective logic. The feedwater heaters do not directly interface with equipment that is important to safety. The feedwater heaters themselves do not have safety functions. Therefore, the proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.
- II. No new failure modes will be introduced by the proposed action to operate with the repaired feedwater heaters. There are no operational parameters that are significantly changed by the proposed action. No physical or structural changes that create the possibility of a new event will be created.

System operational logic will not be changed as a result of the proposed action. In addition, reactor recirculation pump speed limiters that actuate on feedwater heater high-high level signals as described in FSAR Section 7.7.1.3 will not be affected by the proposed action. System logic that protects the main turbine from water induction from the feedwater heaters as described in FSAR Section 10.4 are not affected by the proposed action.

Therefore, the proposed action does not create the possibility for an accident or malfunction of a different type than any previously analyzed in the FSAR.

- III. No. Technical Specification 3.3.2.2, "Feedwater-Main Turbine High Water Level Trip Instrumentation" is the only technical specification associated with the feedwater system. This technical specification addresses the functionality required to respond to failures of the feedwater level control system that result in excessive feedwater flow. The proposed action does not reduce the margin of safety for this technical specification nor does it reduce the margin of safety for any other technical specification.

SER NO: 01-250

CROSS REFERENCE: DCP 256493, Unit 1

DESCRIPTION OF CHANGE:

This modification installs a Line Stop consisting of a split tee and blind flange on the 6" stainless steel pump discharge line just downstream of Stator Cooling Pump 1P116A. This apparatus will provide isolation (necessary due to a leaking discharge check valve) for rework of a disabled Stator Water Cooling Pump.

SUMMARY:

- I. No. FSAR Chapter 6, "Engineering Safety Features", and FSAR Chapter 15, "Accident Analysis", have been reviewed. There are no engineered safety features or accident scenarios that would be impacted by the actions taken per this modification. The interim actions taken by this modification will have no adverse effect on the operation nor function of the Stator Cooling System as defined in the SAR until a future modification can be installed to restore the system to its original design basis. The vendor has demonstrated that the split tee and blind flange is qualified for the maximum design temperature and pressure experienced by the subject pipe. The weld configuration of the split tee 6" stainless steel pipe does not technically meet ANSI B31.1 Code requirements; however, the weld and material have been evaluated to provide equivalent pressure and structural integrity, and the split tee provides localized pipe wall reinforcement to maintain structural integrity of the piping. Therefore, the proposed actions do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the SAR.
- II. No. The actions taken per this modification will not alter or adversely impact any safety-related systems, nor does this modification change the design function or operation of the Stator Cooling System. All potential accidents involving breach or loss of Service Water are bounded by existing design provisions for complete and sudden loss of the system. Therefore, the proposed actions do not create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. This modification does not jeopardize or degrade the function or operation of any plant system governed by the Technical Specifications. None of the parameters that are the basis for the Technical Specifications will be adversely impacted by this modification. The modification will only remain intact until the Unit 1-12th RIO, at which time the piping will be restored to its original design basis. The modification, with minor differences to the ANSI B31.1 Code, will not have any impact on Technical Specification safety margins. Therefore, the proposed actions do not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-251

CROSS REFERENCE: DCP 99-3082, Unit 2

DESCRIPTION OF CHANGE:

The proposed action is to replace the failed Unit 2 Phase A Westinghouse Main Transformer (2X101A) with a spare ABB transformer and remove the old failed Westinghouse transformer which eliminates spare transformer 2X101D.

SUMMARY:

- I. No. The replacement of a failed Unit 2 Phase A Westinghouse Main Transformer with a spare ABB transformer does not affect any of the postulated initiating events identified in Chapter 6 and 15 of the FSAR, the Design Assessment Report, the current Reload Analysis, NUREG 0776 or FPRR. The only interface with equipment important to safety is the additional loading on the safety related 125 VDC system as the result of the ABB Transformers local annunciator and control logic and elimination of 2X101D related 125V DC load from the safety related 125 VDC system. The additional load due to replacement of transformer 2X101A and removal of transformer 2X101D load on the Unit 2 Division 1/Channel A 125 VDC Safety Related System was evaluated for loading as well as for Appendix R considerations and is acceptable. The consequence of an accident is not affected by the proposed action. No system taken credit for as a barrier to offsite releases is affected by the proposed action.

The consequences of a random single failure of the Phase A Transformer as an ABB Transformer is no different than the existing consequences of a failure of the existing Westinghouse Transformer. The 125 VDC supply to the transformer annunciator and control logic is from a non-safety related distribution panel which is isolated from the safety related 125 VDC distribution system. The proposed action does not affect the isolation scheme. Therefore, the proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.

- II. No. The proposed action does not adversely affect any safety related system, nor does it change the design basis of any system or structure. All changes performed under the proposed action are designed and installed in accordance with applicable Codes and Standards to ensure their design and construction integrity. In addition, no system interfaces are adversely affected. The potential impact of negative sequence current on the Main Transformer and Main Generator heating losses and on the torsional vibration within the Main Turbine associated with the transformer impedance mismatches is eliminated. A random single failure in the ABB Transformer annunciator or control logic continues to be isolated from the Safety Related 125 VDC system. In addition, no system interfaces are adversely affected. Thus, the replacement of a failed Unit 2 Phase A Westinghouse Main Transformer with a spare ABB transformer does not create a possibility for an accident or malfunction of a different type.

- III. No. The Main Transformers, nor the Fire Protection for the Main Transformers, is governed by Technical Specifications. The Main Transformers and their Fire Protection are not directly interlocked with any other Technical Specification related system or component to initiate action(s). Operability of the Safety Related 125 VDC System is governed by Technical Specification Sections. 3.8.4, 3.8.5, 3.8.7 and 3.8.8. The bases for operability of the DC system is to "...provide the AC emergency power system with control power and to"...provide both motive and control power to selected safety related equipment." Since the additional loading associated with the ABB Transformer annunciator and control logic is acceptable, the proposed action does not reduce the margin of safety associated with the 125 VDC system. The proposed action does not affect the Technical Specification so there is no change in the margin of safety defined in the basis for any Technical Specification.

SER NO: 01-252

CROSS REFERENCE: NL-00-022, Unit 1 and 2

DESCRIPTION OF CHANGE:

This change proposes to change the setpoint of instantaneous unit of the AC overcurrent relays (50151A, B, C) associated with Residual Heat Removal (RHR) pump 1P202A through 1P202D Unit-1 [2P202A through 2P202D Unit-2] motors. This change in the relay setpoint will resolve the condition about the relay target (B phase) in tripped condition with the pump (1P202A) motor running.

SUMMARY:

- I. No. Overcurrent relaying is discussed in FSAR section 8.3.1.3.13, "Electrical Circuit Protection Systems". Per FSAR section 8.3.1.3.13, the circuit protection is designed so that the fault isolation is secured with minimum circuit interruption. The combination of devices and settings applied affords the selectivity necessary to isolate a faulted area quickly with a minimum of disturbance to the rest of the system.

The instantaneous overcurrent relay is set above the asymmetrical locked rotor current experienced during motor starting and is set well below the minimum fault current experienced during a short circuit fault. The setpoint does not exceed the thermal limit of the motor feeder cable. There is sufficient margin between the setting of the motor overcurrent relay and that of the upstream 4kV bus main breaker.

FSAR section 15.2 has evaluated failure of one division of RHR system. FSAR evaluation may be considered to include consideration of consequences of an accident due to change in the overcurrent relay setpoint. There is no increase in the probability of occurrence of an accident due to change in the overcurrent relay setpoint because the pump motor is tested prior to putting in operation to verify that the new setpoints are properly installed. The revised overcurrent relay setpoint insures that there is sufficient margin between the actual motor starting current and the current at which the overcurrent relay will trip. This will insure that there is no inadvertent tripping of pump motor.

Therefore, considering this a simple setpoint change, the proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.

- II. No. The worst case accident scenario due to the proposed change in the overcurrent relay setpoint is unavailability of a RHR pump during a design basis event. FSAR section 15.2 has evaluated a case when one division of RHR system (i.e. two RHR pumps) is not available. Actual motor starting test currents are used to determine overcurrent relay setpoints. Therefore, this scenario is not considered as credible.

The other worst case accident scenario that can be postulated is the tripping of the main 4kv switchgear incoming circuit breaker. The proposed overcurrent relay instantaneous unit trip setpoint is such that the RHR pump motor breaker will trip before the incoming breaker is tripped by its overcurrent relay time unit setpoint.

Therefore, the proposed action does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.

- III. No. The proposed action does not reduce the margin of safety as defined in the basis of for any technical specification because there is no change in the devices or procedure. The change in the setpoint is in the conservative direction, which will prevent inadvertent tripping of a RHR pump motor. TS Bases B.3.3.8.1; B.3.4.8; B.3.4.9; B.3.5.1; B.3.5.2; B.3.8.1 and B.3.8.2 were reviewed.

SER NO: 01-253

CROSS REFERENCE: DCP 244920, Unit 1

DESCRIPTION OF CHANGE:

This modification replaces the existing mechanical level instrumentation, LI-017105 and LSHL-017105, with electronic instrumentation. The level instrumentation is for the domestic well water tank, 0T594.

SUMMARY:

- I. No. The design of this modification fully complies with the Design Bases discussed in FSAR 9.2.11, "Potable Water and Sanitary Waste Systems". Specifically, the onsite requirements to supply potable water will not be impacted from performing their intended design function. Therefore, the proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.
- II. No. The design change provided by this modification will be in accordance with the applicable design criteria and operational requirements as specified in the FSAR, and all applicable commitments will be satisfied. Therefore, no new accident precursors will be created. The design will not affect nor impact the operability of the potable water system. No new equipment failure modes will be created by the action taken via this modification. Therefore, the proposed action does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.
- III. No. The replacement of the domestic well water level element will be in accordance with the applicable design criteria and operational requirements as specified in the FSAR. This modification will not affect the operability or safety function of any makeup water subsystem. The makeup water subsystems will continue to perform their intended design function as required by FSAR 9.2.11. Therefore, the proposed action does not reduce the margin of safety as defined in the basis for any Technical Specifications.

SER NO: 01-254

CROSS REFERENCE: NL-91-011, Unit 1 and 2

DESCRIPTION OF CHANGE:

This evaluation assesses Fuel Pool Cleanout that removes expanded irradiated reactor vessel components (excluding spent fuel) and miscellaneous waste from the Unit 1 and Unit 2 spent fuel storage pools.

SUMMARY:

- I. No. All equipment/material lifts performed during the Fuel Pool Cleanout Project will be in compliance with PPL Heavy Loads Program requirements. The existing fuel handling accident described in FSAR Section 15.7.4 which discusses a fuel drop into the vessel, envelopes any potential consequence of irradiated components impacting spent fuel assemblies during Fuel Pool Cleanout operations. FSAR Sections 9.1.2 (Spent Fuel Storage) and 9.1.5 (Reactor Building Cranes) have been reviewed and are not impacted by Fuel Pool Cleanout operations. Cask Storage Pit Gate installation will be in accordance with the requirements of Technical Requirements Manual Section 3.7.10 "Spent Fuel Storage Pools" and the safety discussion in FSAR Section 9.1.3 (Spent Fuel Pool Cooling and Cleanup System). Laydown areas and safe load paths on the Refueling Floor and in the Unit 1 Railroad Access Bay have been designated and are capable of withstanding all loading considerations without affecting any equipment important to safety. In summary, the Fuel Pool Cleanout Project does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.
- II. No. Fuel Pool Cleanout Project activities have no adverse plant effects. The transport paths and lifting devices are in compliance with PPL Heavy Load Program requirements. All laydown areas can adequately support the loads imposed under all required loading combinations. The Unit 1 Railroad Access Bay is capable of sustaining the maximum transfer trailer loads. Therefore, load handling, laydown, and transport during Fuel Pool Cleanout operations do not create an accident or malfunction of a different type than has previously been evaluated in the FSAR.
- III. No. The plant Technical Specifications and Technical Requirements Manuals were reviewed for potential impact relative to operations associated with the Fuel Pool Cleanout Project. Specifically, Technical Requirements Manual Section 1.1 (Process Control Program), Section 3.3.1 (Radiation Monitoring Instrumentation), Section 3.7.10 (Spent Fuel Storage Pools), Section 3.9.3 (Refueling Platform), Sections 3.11.2 and 3.11.3 (Radioactive Effluents) and Sections 3.12.1 through 3.12.3 (Loads Control Program) were reviewed. This review concluded that there is no reduction in the margin of safety as defined in the basis for related Technical Specifications or Technical Requirements Manuals as a result of Fuel Pool Cleanout activities.

SER NO: 01-255

CROSS REFERENCE: DCP 209674 (210350), Unit 1 and 2

DESCRIPTION OF CHANGE:

This modification installs caged ladders, duct hatches, scaffold supports, a new roof hatch, and 480V receptacles to the ventilation skin area of the Reactor Building (elevation 818) to permit cleaning of the Reactor Building exhaust duct flow straightener.

SUMMARY:

- I. No. FSAR Chapter 15, "Accident Analysis", Chapter 6.2, "Containment Systems", and Chapter, 9.4.2, "Reactor Building Ventilation System" were reviewed. There are no safety features or accident scenarios that would be affected by the addition of caged ladders, hatches, scaffold supports, and 480V receptacles to the ventilation skin area. The actions taken by this modification will have no adverse implications on the operation or function of the secondary containment pressure boundary. Based on the above, this modification will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the FSAR.
- II. No. The proposed modification to construct caged ladders, hatches, scaffold supports, and 480V receptacles to the ventilation skin area does not create a possibility for an accident or malfunction of a different type than previously evaluated in the FSAR because the proposed equipment maintains the secondary containment pressure boundary design basis and precludes fission product transport to the environment. This modification will not create the possibility of an accident or malfunction of a different type than any evaluated previously in the FSAR.
- III. No. This modification does not degrade the function of any plant system governed by Technical Specifications, Tech. Spec. Basis, or the Technical Requirements Manual. None of the parameters that are in the basis for the Technical Specifications and no operating or accident parameters will be adversely impacted by this modification. The actions taken by this modification will not reduce any margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-256

CROSS REFERENCE: DCP 225241, Unit No. 1, 2

DESCRIPTION OF CHANGE:

The proposed action documents that the existing fire detector configuration for the Priority III Fire Zones is capable of providing notification of a fire in sufficient time to allow the appropriate plant response.

The proposed action also is to provide further documentation of the Fire Detection System in the SSES design configuration control system necessary to assure the appropriate level of compliance with the commitments made in PLA4945, "Response to NRC Fire Protection Functional Inspection," NRC Unresolved Item URI 50-387, 388/97-201-05.

SUMMARY:

- I. No. The existing fire detector spacing in the Priority III Fire Zones is acceptable for providing the necessary notification of the presence of a fire in a time frame that allows the appropriate plant response. Also, providing further documentation of the Fire Detection System in the SSES design configuration control system to demonstrate the appropriate level of compliance with the commitments made in PLA-4945 does not affect any of the postulated initiating events identified in Chapter 6 and 15 of the FSAR, the Design Assessment Report, the current Core Operating Limits Report in the Technical Requirements Manual, NUREG 0776 or FPRR.

The Fire Detection System detectors only determine whether there is a fire in the area and do not have a direct interface with any equipment important to safety. An indirect interface between the Fire Detection System and any equipment important to safety is not created by the proposed action since the existing operating conditions of the Fire Detection System are not changed.

The proposed action does not change the impact of a random single failure of the fire detection system. As indicated in Branch Technical Position 9.5-1, Appendix A, "Postulated fires or fire protection system failures need not be considered concurrent with other plant accidents or the most severe natural phenomena."

Therefore, the proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.

- II. No. The review did not identify a postulated initiating event which would create the possibility for an accident of a different type. The proposed action does not create a malfunction of a different type. The consequences of random single failure of the Fire Detection System is the same as the existing consequences. Thus, the possibility of a malfunction of a different type is not created.

The existing fire detector spacing in the Priority III Fire Zones is acceptable for providing the necessary notification of the presence of a fire in a time frame that allows the appropriate plant response. Neither this action nor providing further documentation of the Fire Detection System in the SSES design configuration control system to demonstrate the appropriate level of compliance with the commitments made in PLA-4945 creates a possibility for an accident or malfunctions of a different type.

- III. No. The operability of the Fire Detection System is governed by the Technical Requirements Manual (TRM) Section 3.7.3.8 entitled "Fire Detection Instrumentation" which is part of the FSAR. The bases for operability of the Fire Detection System is to ensure that adequate warning capability is available for the prompt detection of fires. The proposed action does not reduce the margin of safety associated with the fire detection system. The proposed action does not affect the Technical Specification so there is no change in the margin of safety defined in the basis for any Technical Specification.

SER NO: 01-257

CROSS REFERENCE: DCP 237306, 237308, 237309, Unit N/A

DESCRIPTION OF CHANGE:

These changes will expand the Independent Spent Fuel Storage Installation (ISFSI) by adding fourteen new Horizontal Storage Modules (HSMs) and the associated Temperature Monitoring System and Lightning Protection System.

SUMMARY:

I. No. The proposed modifications do not increase the probability of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR. Chapter 9 and 15 of the FSAR have been reviewed against the effects of the proposed change to substantiate this conclusion. The expansion of the ISFSI is independent of all plant safety systems and has been determined to have no adverse effects on the safe operation of the SSES.

II. No. The expansion of the ISFSI was assessed and it was determined to have no adverse effect on Units 1 and 2. The ISFSI does not interface with safety related systems. In addition, based on the reviews performed for the effects of the ISFSI on SSES as addressed in this safety evaluation it was concluded that no possibility exists for an accident or malfunction of a different type than any evaluated previously in the FSAR.

Accidents that could occur within the ISFSI itself have been evaluated in the Transnuclear West SAR and were accepted by the NRC in the NRC SER/C of C and are outside the scope of this evaluation.

III. No. Technical Requirements Section 3.10.3, Independent Spent Fuel Storage Installation (ISFSI), discusses the Actions/Surveillances required for HSMs that are loaded with spent fuel. Technical Specification Section 4.0, Design Features, discusses Spent Fuel Storage Pool capacity limits. These Technical Specifications and Technical Requirements apply to the spent fuel transfer and handling process and do not apply to the expansion of the ISFSI, therefore, the margins of safety defined in their bases are not reduced.

SER NO: 01-258

CROSS REFERENCE: NL-00-012, Unit 1 and 2

DESCRIPTION OF CHANGE:

This change revises TRO 3.6.4 and its Bases to clarify the requirements for closed systems. This change is necessary to eliminate a conflict that would otherwise exist between the Technical Specification Bases and Technical Requirements Manual Bases.

SUMMARY:

- I. No. The proposed changes do not increase the probability of occurrence of an accident or malfunction of equipment important to safety previously evaluated in FSAR Chapters 6 or 15, since the performance of these components as containment isolation barriers has already been previously evaluated in FSAR Chapter 6. The proposed actions do not increase the consequences of an accident previously evaluated in Chapter 15 of the FSAR, since the affected components are already required to be tested and maintained in accordance with the Leakage Rate Test Program. The proposed actions do not increase the consequences of a malfunction of equipment important to safety.
- II. No. The use of the affected components as containment isolation barriers has been previously evaluated in FSAR Section 6.2.4. Furthermore, these components are currently required to be leak rate tested in accordance with the Susquehanna Leakage Rate Test Program, and are required to be within the FSAR Chapter 15 DBA LOCA Dose Analysis assumptions for leakage from primary containment. Thus, the proposed action does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.
- III. No. The proposed action does not reduce the margin of safety as described in the bases for any Technical Specifications. The applicable Technical Specifications section is 3.6.1.3 for Primary Containment Isolation Valves. The proposed action includes changes to the bases for these Technical Specifications to clarify the containment isolation function for Primary Isolation Containment Valves. As such, the proposed changes do not decrease the margin of safety currently provided in the bases for these Technical Specifications.

SER NO: 01-259

CROSS REFERENCE: DCP 97-9100C, Unit N/A

DESCRIPTION OF CHANGE:

This modification replaces the existing Fisher/Magnetrol Fuel Oil Day Tank level transmitter.

SUMMARY:

- I. No. The design of this modification fully complies with the design bases discussed in FSAR 9.5.4.1, 'Diesel/Generator Fuel Oil Storage and Transfer System. Specifically, the onsite requirements to transfer fuel oil from the Fuel Oil Storage Tank to the Fuel Oil Day Tanks. It also meets the requirements of FSAR 8.3.1.4, "Standby Power Supply" which requires standby power supply consisting of one diesel generator complete with its accessories and fuel storage transfer system. This modification will not adversely impact or affect any safety-related function of the generators. Therefore, the proposed action of transmitter replacement will not increase the probability of occurrence or consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.
- II. No. The design change provided by this modification will be in accordance with the applicable design criteria and operational requirements as specified in the SAR and all applicable, commitments will be satisfied; therefore, no new accident precursors will be created. The design will not affect nor impact the operability of the Diesel Generator (D/G) Fuel Oil Storage, Fuel Oil Transfer, or the D/G A through E Fuel Oil Day Tank System, and they will continue to perform their safety-related function. No new equipment failure modes will be created by the action taken via, this modification. Therefore, the proposed action does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. The replacement of the Fuel Oil Day Tank transmitters on D/G A through E, will be in accordance with the applicable design criteria and operation requirements as specified in the FSAR. All applicable commitments will be satisfied. This modification will not affect the operability nor any safety function of any diesel generator. The Diesel Generators will continue to perform their safety function as required by Technical Specifications 3/4.8.1, "AC Sources". Therefore, the proposed actions do not reduce the margin of safety as defined in the basis for any Technical Specifications.

SER NO: 01-260

CROSS REFERENCE: NL-99-057, Unit 1 and 2

DESCRIPTION OF CHANGE: The Engineered Safeguard Service Water (ESSW) pumphouse HVAC system operation is governed by TSI 1/2-88-004, Rev. 5. This TSI will be incorporated into the Technical Requirements Manual using the guidance presented in the ESSW Pumphouse HVAC design calculation.

SUMMARY:

- I. No. The proposed TRM section does not increase the probability of occurrence or the consequences of an accident or the malfunction of equipment important to safety, as previously evaluated in the SAR. The proposed TRM section will require the ESSW Pumphouse ventilation system to be operated within the bounds of the FSAR analysis. FSAR Chapters 3, 6, 9, 12 and 15 and NUREG 0776 were reviewed to determine if the proposed TRM Section has an effect on the spectrum of postulated initiating events for which transients or operational occurrences and accident conditions were analyzed. NUREG 0776 and FAR Section 9 provide a description of the expected operation of the ESSW Pumphouse Ventilation system. The proposed TRM section will operate the system within the limits stated in the above documents, thus the conclusion was reached that the proposed TRM section does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety.
- II. No. The proposed TRM section does not create the possibility for an accident or malfunction of a different type than any previously described in the SAR. This conclusion was reached after examination of the FSAR. FSAR Sections 9.2 and 9.4 received special attention. Examination of the FSAR determined that the proposed TRM section operates the ESSW Pumphouse ventilation system in a manner consistent with that described in the FSAR. The FSAR describes that the system is designed to prevent equipment freezing by designing the intake and exhaust dampers to fail closed. The proposed TRM section assures that if a fan/damper system fails, the freeze protection will be maintained. The proposed TRM surveillance requirement confirms the FSAR statement for this system that the fans will start on a pump start. Since the proposed TRM section is consistent with the FSAR and the current HVAC design analysis, the environment in the pumphouse will remain within the equipment operability limits. As such, the equipment in the ESSW Pumphouse will be able to perform its design basis function. Based on this information, the conclusion was reached that the proposed TRM section does not create a possibility for an accident or malfunction of a different type than any previously evaluated in the SAR.
- III. No. The proposed TRM section affects no Technical Specifications and does not reduce the margin of safety as defined in the bases of any Technical Specifications. Technical Specification Section 3.7.1 "RHRSW and UHS" and Section 3.7.2. "ESW System" received additional focus. The proposed TRM section is consistent with these sections and will actually provide additional assurance that the systems will be available to perform their design basis function. Based on the above information, it was determined that the new proposed TRM section will not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-261

CROSS REFERENCE: NL-00-029, Unit 1 and 2

DESCRIPTION OF CHANGE:

The purpose of this evaluation is to support a revision to TRO 3.7.10, "Spent Fuel Storage Pools (SFSPs)" to eliminate the refueling cycle specific applicability and establish this evaluation as the basis for this TRO allowing isolation of the SFSPs for specific evolutions.

SUMMARY:

- I. No. The licensing basis event for a loss of SFSP cooling, as defined by the NRC SER for the Fuel Pool Cooling issue, is a seismic event concurrent with a Loss of Offsite Power (LOOP). The Spent Fuel Storage Pools are normally maintained in a crosstied configuration during normal plant operation and refueling outages. Closing of the Cask Storage Pit Gates is required for specific evolutions, such as spent fuel transfer or cleanout. Evaluation of the Fuel Pool Cooling and Cleanup System (FPCCS) with the Cask Storage Pit Gates closed has been performed and concludes that adequate Spent Fuel Storage Pool cooling capability exists and, in the event of an accident, contingencies are in place to provide the means for opening the Cask Storage Pit Gates to crosstie the Spent Fuel Storage Pools. Therefore, the probability and consequences of a loss of SFSP cooling event with isolated SFSPs is no worse than that with crosstied pools.
- II. No. The Spent Fuel Storage Pools are normally maintained in a crosstied configuration during normal plant operation and refueling outages. However, closing of the Cask Storage Pit Gates is permitted provided that the specific configuration is evaluated to ensure cooling can be restored prior to boiling. An evaluation of the FPCCS with the Cask Storage Pit Gates closed for such evolutions has been performed and concludes that the Cask Storage Pit Gates may be closed for the duration of a given evolution. Since the FSAR already permits the Cask Pit Gates to be installed for specific evolutions (e.g., spent fuel transfer or clean-out), and the analysis concluded that cooling can be restored, isolating the SFSPs does not create an accident or malfunction of a different type than previously evaluated in the FSAR.
- III. No. The Technical Specification Bases were reviewed to determine if the margin of safety was reduced as a result of the proposed actions described in this safety evaluation. The only Technical Specification related to the SFSPs is LCO 3.7.7, concerning the required water level in the SFSP. The proposed actions associated with this safety evaluation do not reduce the margin of safety for this Technical Specification, since they will not adversely affect water level in the SFSP. The actions addressed by TRO 3.7.10 do not conflict with existing Technical Specification bases for the systems involved and are consistent with the Technical Specifications for these systems. Therefore, the margin of safety as defined in the Bases for any Technical Specification is not reduced.

SER NO: 01-262

CROSS REFERENCE: NL-00-031, Unit N/A

DESCRIPTION OF CHANGE:

The action replaces existing Woodward Governor(s), Part Number 9903-126, on Emergency Diesel Generators A(B)(C)(D)(E) with upgraded Woodward Governor(s), Part Number 9903-254.

SUMMARY:

- I. No. The following sections of the FSAR were reviewed for applicability: Section 15.2 - Increase In Reactor Pressure, Section 15.5 - Decrease In Reactor Coolant Inventory, Section 15.8-ATWS, Section 15.9 -Station Blackout. The failure of a diesel generator does not initiate any accidents described In the FSAR, although the loss of one or more diesel generators can affect the ability of the plant to mitigate these accidents with a loss of off site power. Specifically, a loss of off site power with a common mode failure of all diesels results in a station blackout, which has been previously evaluated In the FSAR. The proposed action of replacing the Woodward Governor(s) with an upgraded version has no adverse effect on the operation of the diesel generators. In fact, the upgraded version of the governor is designed to improve the transient response of the diesel generators, increase overall stability, and significantly reduce the possibility of an over speed trip of the diesel generator(s) during cold starts and following a partial or full load reject.

Therefore, the proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment Important to safety. as previously evaluated In the FSAR.

- II. No. A LOCA/LOOP design-basis accident has been previously analyzed for the loss of one (1) diesel generator. A LOCALOOP/DBA with a common-mode failure of all diesel generators would create the possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR. However, the proposed action of replacing the Woodward Governor(s) with an upgraded version has no adverse effect on the operation of the diesel generators. In fact, the upgraded version of the governor is designed to improve the transient response of the diesel generators, increase overall stability, and significantly reduce the possibility of an over speed trip, of the diesel generator(s) during cold starts and following a partial or full load reject.

Therefore, the proposed action does not Increase the possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.

- III. No. The following Unit I and Unit 2 Technical Specifications were reviewed for applicability:

LCO 3.8.1, Conditions B, D, E and G
SR 3.8.1.3, SR 3.8.1.7, SA 3.8.1.9, SR 3.8.1.10, SH 3.8.1.12. SR 3.8.1.13, SR 3.8.1.14, SR 3.8.1.15. SR 3.8.1.16, SR 3.8.1.18, SH 3.8.1.19, SR 3.8.1.20

The diesel generator surveillance requirements, cited above, have specific voltage and/or frequency limits and/or start times. The bases for these surveillance requirements is to ensure the availability of the standby electrical power supply to mitigate DBAs and transients and maintain the plant in a safe shutdown condition.

The proposed action of replacing the Woodward Governor(s) with-an upgraded version has no adverse effect on the transient response of *the* diesel generators. In fact, the upgraded version of the governor is designed to improve the transient response of the diesel generators, increase overall stability, and significantly reduce the possibility of an over speed trip of the diesel generator(s) during cold starts and following a partial or full load reject.

Therefore, the proposed action does not reduce the margin of safety as defined In the basis for any Technical Specification.

SER NO: 01-263

CROSS REFERENCE: DCP 265007, Unit N/A

DESCRIPTION OF CHANGE:

This modification installs hatches in the Control Room Floor Cooling Return Air Duct to facilitate cleaning of the flow elements.

SUMMARY:

- I. No. FSAR Chapter 1.2, "General Plant Description", Chapter 6.5, "Fission Product Removal and Control System", Chapter 7.3, "Engineered Safety Feature Systems", Chapter 9.2, "Water Systems", and Chapter 9.4, "Air Conditioning, Heating, Ventilation and Cooling Systems", and FSAR Chapter 15, "Accident Analysis", were reviewed. There are no safety features or accident scenarios that would be affected by the addition of access hatches in the Control Room Floor Cooling return air ducts. Administrative controls will be utilized to secure the installation in the unlikely event that Control Room Emergency Outside Air Supply (CREOASS) initiates while the Control Room Return Air Duct is breached. Based on the above, this modification will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the FSAR.
- II. No. The proposed modification to construct access hatches in the Control Room Floor Cooling return air ducts does not create a possibility for an accident or malfunction of a different type than previously evaluated in the SAR because the proposed equipment maintains the system safety functions. In the event that CREOASS is required during installation of the modification, the Return Air Duct pressure boundary will be restored by manually securing the hatch.
- III. No. This modification does not degrade the function of any plant system governed by technical Specifications, Tech Spec Basis, or the Technical Requirements manual. Dose rates in the Control Room during a Design Basis Accident will not be increased as a result of this modification. Therefore, the actions taken by this modification will not reduce any margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-264

CROSS REFERENCE: DCP 97-9121, Unit 2

DESCRIPTION OF CHANGE:

This modification will remove the regulator boards and perform internal wiring changes for the Vital Uninterruptible Power Source (UPS) panel 2D666. This change will increase the reliability of the Vital UPS panel 2D666.

SUMMARY:

- I. No. Based upon a review of FSAR Chapters 7.7, 8.3.1.8 & 15, there are no initiating events which include the components affected by this modification. This modification will remove the regulator boards and perform internal wiring changes for the Vital UPS panel 2D666. No adverse system logic changes occur. This change will increase the reliability of the Vital UPS panel 2D666. As a result, the probability of an accident previously analyzed in the FSAR is not increased. This modification does not adversely affect any safety-related system, nor does it change the design basis of any system or structure. All changes performed under this modification are designed and installed in accordance with applicable Codes and Standards to ensure their design and construction integrity. In addition, no system interfaces are adversely affected nor any new ones created. Therefore, this modification will not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR. There are no new radiological pathways created and no radiological increase from existing pathways caused by this modification as a result of an accident or a malfunction of equipment.
- II. No. The possible failure modes of the modified Vital UPS panel 2D666 were evaluated for new impacts upon plant equipment and previously evaluated initiating events (evaluated in the FSAR). No new impacts were identified. The modified system configuration conforms to the applicable construction Codes and Standards. The interfaces with equipment important to safety are unaffected by this modification since no new impacts were identified. Therefore, this modification will not result in an accident or malfunction of a different type being created for equipment important to safety.
- III. No. Based upon a review of the design parameters involved with this modification, none which serve as the basis for a margin of safety, as presented in the SSES Technical Specifications, are adversely affected by the modifications. Therefore, this modification does not reduce any margin of safety which serves as the basis for any Technical Specification or Technical Requirement.

SER NO: 01-265

CROSS REFERENCE: NL-00-025, Unit 1 and 2

DESCRIPTION OF CHANGE:

This revision permits running the diesel engine when Diesel Generator A, B, C, or D is unloaded and not aligned to a 4.16kV ESS Bus.

SUMMARY:

- I. No. The consequences of any accident involving the affected systems are bounded by existing accident analyses and the proposed action does not increase the probability of occurrence of any accident or malfunction of equipment important to safety described in the FSAR.

The following sections of the FSAR were reviewed for applicability: Sections 9.2.5.2 and 9.2.5.3, Section 15A Event 42 and Section 15.6.5.

Neither a postulated loss of the Emergency Service Water (ESW) System nor a postulated loss of the Emergency Diesel Generators are initiating events for a loss of coolant accident or the loss of offsite power. Therefore, the proposed action does not increase the probability of occurrence for any accident previously evaluated in the FSAR. A postulated total loss of the ESW System would increase the consequences of a LOCA or a LOOP, however, each loop of ESW is fully capable of mitigating these accidents and the plant is analyzed for the loss of one loop of ESW. Entry into LCO 3.7.2 for the affected loop of ESW when blocking open the supply and return valves to an unaligned diesel generator heat exchanger eliminates the requirement of postulating the single failure of the other loop of ESW. Both spray arrays are still available when the unaligned diesel is running. Entry into LCO 3.7.2 for the affected loop of ESW when blocking open the supply and return valves to an unaligned diesel generator heat exchanger eliminates the requirement of postulating an additional single failure of a spray array. Furthermore, spray pond temperatures are typically maintained well below the 85.5°F maximum design temperature. The LOCA/LOOP analysis assumes the loss of one diesel generator. Running an unaligned diesel generator unloaded does not affect the operation of the four (4) remaining aligned diesel generators.

- II. No. The proposed action does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.

The following sections of the FSAR were reviewed for applicability: Sections 9.2.5.2 and 9.2.5.3, Section 15A Event 42 and Section 15.6.5. The loss of ESW and the loss of diesel generators are not initiating events for any accidents. The loss of one loop of ESW and the loss of one diesel generator have been evaluated in the accident analyses. Both loops of ESW remain operable and available while an unaligned diesel is running unloaded. The proposed action does not affect the operation of the four (4) remaining diesel generators. Furthermore, entry into LCO 3.7.2 for the affected loop of ESW when blocking open the supply and return valves to an unaligned diesel generator heat

exchanger eliminates the requirement of postulating an additional single failure of any other equipment or system.

- III. No. The proposed action does not reduce the margin of safety as defined in the basis for any Technical Specification, and in fact the proposed action slightly increases the net margin of safety by having four (4) operable diesels aligned.

The following Technical Specifications were reviewed for applicability: Unit 1 and Unit 2 TS B 3.7.1, Unit 1 and Unit 2 TS B 3.7.2, Unit 1 and Unit 2 TS B 3.8.1, Unit 1 and Unit 2 TS B 3.8.2 and Unit 1 and Unit 2 TS B 3.8.3.

LCO 3.7.2.A applies to the loss of one ESW pump in each subsystem. LCO 3.7.2B applies to one or two ESW subsystems not capable of supplying ESW flow to at least three required DGs. The proposed action of blocking open the supply and return valves to one unaligned diesel generator does not apply to either of the above conditions. LCO 3.7.2.C applies to one ESW subsystem inoperable for reasons other than Condition B. The Action 3.7.2.C.1 is to restore the affected subsystem to operable status within 7 days. The basis for this action is that with the unit in this condition, the remaining operable ESW subsystem is adequate to perform the heat removal function. However, the overall reliability is reduced because a single failure in the operable ESW subsystem could result in the loss of ESW function. The 7 day completion time is based on the redundant ESW system capabilities, the low probability of an accident occurring during this time period, and is consistent with the allowed completion time for restoring an inoperable core spray loop, Low Pressure Coolant Injection (LPCI) pumps and control structure chiller.

As previously discussed, the proposed action does not result in a complete loss of function of either ESW loop, although the added ESW flow through the heat exchanger of the unaligned diesel may slightly degrade the ability of the affected ESW loop to perform its function. Therefore, entering LCO 3.7.2.C is a conservative action.

SER NO: 01-266

CROSS REFERENCE: NL-00-026, Unit 1 and 2

DESCRIPTION OF CHANGE:

The intent of this change is to update the Core Spray (CS) and Reactor Water Cleanup (RWCU) FSAR Process Flow Diagrams (PFDs), such that they are consistent with the description of their associated systems provided elsewhere in the FSAR.

SUMMARY:

- I. No. The operating conditions identified on the updated PFDs are bounded by analyses, which demonstrate that these conditions do not unduly challenge these systems. Further, these analyses also demonstrate that these systems are fully capable of safely and reliably meeting their performance requirements. As a result, these changes do not represent conditions, which would degrade equipment performance, nor challenge the function and integrity of components and piping.

The only safety related function of the RWCU system is to act as, and isolate the reactor coolant pressure boundary. The proposed changes pertain to normal plant operation and do not affect the system's isolation capabilities, since the Generic Letter 89-10 operating bases for the system's isolation valves account for the SSES Power Uprate operating conditions.

The operating parameters identified on the updated CS PFD supports its Emergency Core Cooling System (ECCS) safety related function. Further, the proposed changes do not increase the probability of a failure of the CS or RWCU systems since they do not increase in the physical challenges to the system.

Considering that these systems can safely operate within the envelope identified on the updated PFDs, the proposed changes do not increase the probability of occurrence of an accident or equipment malfunction previously evaluated in the FSAR.

- II. No. The changes proposed are consistent with the operational practices for these systems, as currently described elsewhere in the text and tables of the FSAR. The proposed changes do not alter the design and licensing bases of these systems, nor change any system performance or operating requirements. The changes do not create any new operating modes, nor alter the operational configuration of existing system modes. As such, the changes are essentially administrative in nature. In addition, the engineering evaluations have concluded the CS and RWCU systems remain well within their design envelope. Since these systems will be operated per their design intent, plant conditions will not be established which could result in an accident or a malfunction of a different type than previously evaluated in the FSAR.
- III. No. The operating conditions for the CS and RWCU systems will remain well within the design envelope of the associated components and piping. These systems remain fully capable of performing their required safety functions. The changes do not, in any way, affect the operability, or operability requirements of the CS or RWCU systems.

Furthermore, they are essentially administrative in nature and do not affect the physical plant, nor its analytical basis. Hence, the margin of safety defined in the bases of the SSES Technical Specifications for all potentially affected safety functions will therefore be maintained.

SER NO: 01-267

CROSS REFERENCE: NL-00-027, Unit 1 and 2

DESCRIPTION OF CHANGE:

This change revises the Technical Specification Bases for SR 3.8.4.7 to modify the way SSES calculates the percentage ampere-hour capacity of Class I E 250 VDC batteries. Also, the proposed action corrects an error in the use of the temperature correction factor K.

SUMMARY:

- I. No. The proposed formula accurately calculates the capacity of the batteries. There are no terms in the formula that would result in a calculated capacity being higher than the actual battery capacity. This assures that the batteries are within Technical specification limits and can perform their safety function when required. The proposed formula determines the Class 1 E 250 VDC battery % capacity by measuring battery discharge in terms of Ampere-Hours discharged until the battery terminal voltage reaches 210 volts DC (1.75 volts per cell average) instead of the time required to discharge the battery to 210 volts DC. Both formulae are essentially not different. FSAR Section 8.3.2.2.1 was reviewed.

The proposed formula for calculating the % battery capacity accurately reflects the battery capacity using the results of the modified performance surveillance tests and meets the intent of IEEE Std 450-1995. The use of this formula does not adversely affect the independence and redundancy of the Class 1E 250 V DC system, does not degrade the performance of any safety system, change the performance of any system, increase the probability of the failure of systems to perform their safety function, does not create a new radiological release path, does not impact radiation barriers, and does not change the release rate or duration. Therefore, use of the proposed formula to determine the battery % capacity does not increase the probability of occurrences or consequences of an accident or malfunction of an equipment important to safety as previously evaluated in the FSAR.

- II. No. The proposed formula for calculating the % battery capacity accurately reflects the battery capacity using the results of the modified performance surveillance tests to assure the battery remains within SR 3.8.4.7 and SR 3.8.4.8 acceptance criteria. The use of this formula does not adversely affect the independence and redundancy of the Class 1 E 250 V DC system and does not create new mechanisms for failures to prevent proper protective action at the system level. Therefore, using the proposed formula for calculating the % battery capacity does not create a possibility for an accident or malfunction of a different type than evaluated previously in the FSAR. FSAR Section 8.3.2.2.1 was reviewed.
- III. No. The DC electrical power systems are designed to provide sufficient capacity, capability, independence, redundancy, and testability to perform its safety functions. Two independent Class 1 E 250 V DC subsystems are provided. Using the proposed formula does not decrease the reliability of the Class 1E 250 V DC batteries since this formula assures that the battery capacity is sufficient to supply the load profile. The use

of this formula does not adversely affect the independence and redundancy of the Class I E 250 V DC system. Therefore, the margin of safety is not reduced. Reference Technical Specification Bases 3.8.4, 3.8.7 and 3.8.8

SER NO: 01-268

CROSS REFERENCE: DCPs 224005, 224009, Unit 1 and 2

DESCRIPTION OF CHANGE:

This change deletes the reactor water cleanup (RWCU) pump proximity probe.

SUMMARY:

- I. No. The safety function performed by the RWCU is maintaining the Reactor Coolant Pressure Boundary (RCPB). The removal of the alarm function associated with pump vibration and speed will not impact the RWCU System's ability to cope with a breach of the RCPB in the cleanup area. The consequences of interest in a design basis accident, or anticipated operational occurrence, are doses to the public resulting from failure of boundary performance. The proposed changes collectively ensure proper and safe operation of the RWCU System as delineated in FSAR Section 5.4.8. These changes do not affect any accidents or malfunctions of equipment that have radiological consequences. In addition, no breach to any radioactive boundary occurs. Therefore, the proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.
- II. No. The RWCU System's ability to isolate a breach in the RCPB or isolate upon receipt of a signal from Primary Containment and Reactor Vessel Isolation Control System (PCRIVICS) will not be impacted by this modification. The existing system operating configuration and operating features will not be altered. No automatic functions will be impacted by this modification. Therefore, the proposed action does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.
- III. No. Technical Specification (TS) Section 3.4.4, Limiting Conditions of Operation, and surveillance requirements for RWCU water chemistry were reviewed but determined not impacted. Water chemistry requirements are included in the Technical Requirements Manual (TRM) Section 3.4.1. The TRM has been reviewed and determined not to be impacted. Modifying the vibration and speed monitoring portion of RWCU pumps 1(2)P221A & B will not impact the margin of safety as currently stated. The proposed action does not alter the TS or TRM requirements relating to water chemistry. Therefore, the proposed action does not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-269

CROSS REFERENCE: NL-99-038, Unit 1 and 2

DESCRIPTION OF CHANGE:

The proposed action is to update the SSES Fire Protection Review Report (FPRR) compliance statement to BTP 9.5-1, Appendix A, Rev. 0, Section DA (h) to include changes that occurred along the East wall of the Unit 1 and Unit 2 Reactor Building and the addition of the 'E' Diesel Generator facility. The update is to include:

1.) The addition of the two oil-filled Engineered Safeguards Auxiliary Transformers OX-211 and OX-213 installed outside the East wall of the Unit 1 and Unit 2 Reactor Buildings. 2.) The acceptability of the fire protection features of the Unit 1 and 2 RHR Pump Room Steam Vents, Steam Vent penetrations and Blowout Panels to provide protection to the reactor building safety related components in the event of a oil filled transformer fire. 3.) The addition of the spare oil-filled Test Facility Transformer OX-207 installed outside the South wall of the 'E' Diesel Generator building. 4.) The acceptability of the fire protection features of the penetrations installed within 50 feet of an oil-filled transformer in both the Unit 1 and Unit 2 Reactor Buildings and the 'E' Diesel Generator Building which contain safety-related systems. 5.) The additions on the corresponding Fire Protection Features drawings in the FPRR to emphasize the requirements of the oil filled transformer related to the Susquehanna SES commitments to BTP9.5- 1, Appendix A, Rev 0, Section D. 1 (h).

SUMMARY

- I. No. Chapters 6 and 15 of the FSAR, The Design Assessment Report and the Core Operating Limits Report in the Technical Requirements Manual were reviewed. The proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR. There are no impacts on equipment important to safety. The function of the East wall of the Unit 1 and Unit 2 Reactor Building and the South wall of the 'E' Diesel Generator building does not change. Appendix R safe shutdown can be achieved and maintained for postulated fires in any plant area.
- II. No. The proposed action does not identify a postulated initiating event which would create the possibility of an accident or malfunction of a different type. There were no new scenarios that could be postulated that would create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.
- III. No. The proposed action does not affect the operability requirements of any safety related system component as governed by Technical Specification or Technical Requirements Manual. The margin of safety as defined in the basis of the Technical Specification or Technical Requirements Manual is not reduced by the proposed action. Technical Specification 3.6.4.1 and TRM 3.7.3.7 were reviewed.

SER NO: 01-270

CROSS REFERENCE: DCP 231465, Unit 2

DESCRIPTION OF CHANGE:

The proposed action is to replace the 10 Amp control power fuses in 2C617 with 5 Amp fuses for four control logic circuits associated with the Residual Heat Removal (RHR) and the High Pressure Coolant Injection (HPCI) system that have a common power source and route through the Control Room.

SUMMARY:

- I. No. The proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR. There are no impacts on equipment important to safety. The control logic supplied from the fuses and the source of control power to the fuses do not change. The operability of the HPCI 54" high water level trip for a fire in the Control Room has been ensured by controlling the effects of multiple high impedance faults on 125 VDC Distribution Panel 2D614 Breaker 07. Replacing the control power fuses in 2C617 for a select group of four control logic circuits associated with RHR and HPCI systems does not affect any of the postulated initiating events identified in Chapter 6 and 15 of the FSAR, the Design Assessment Report, and the current Core Operating Limits Report in the Technical Requirements Manual.
- II. No. The proposed action does not identify a postulated initiating event that would create the possibility of an accident or malfunction of a different type. There are no new scenarios that could be postulated that would create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR. The proposed action does not change the impact of a random single failure of RHR or HPCI.
- III. No. The proposed action does not affect the operability requirements of any safety related system component as governed by Technical Specification or Technical Requirements Manual. The margin of safety as defined in the basis of the Technical Specification or Technical Requirements Manual is not reduced by the proposed action. Technical Specification sections 3.3.5.1, 3.4.8, 3.4.9, 3.5.1, 3.5.2, 3.6.2.3, 3.6.2.4, 3.9.7 and 3.9.8 were reviewed.

SER NO: 01-271

CROSS REFERENCE: DCP 200714, Unit 2

DESCRIPTION OF CHANGE:

Replacement of Actuator Gearset on HV-255F00I, the normally closed High Pressure Coolant Injection Turbine Steam Supply isolation valve.

SUMMARY:

- I. No. The modification does not increase the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety as previously evaluated in the SAR. The gearset replacement does not affect the pressure-retaining boundary of the valves or adversely impact the active safety functions of the valve, its hydraulic characteristics, or its seat leakage characteristics. The static and dynamic stroke times for this valve remain within the 20-second requirement. Therefore, the HPCI delivery used in accident analyses is not affected by increasing the stroke time to open the HPCI Turbine Steam Supply isolation valve. FSAR Sections 6.3 and 7.3.1, the Fuel Cycle Reload Summary Report, and Chapter 15 have been reviewed in making this determination.
- II. No. The modification does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR. The effects of the modification are to increase available torque and to increase the stroke time. Neither of these effects creates the possibility of a new accident or malfunction. The active safety function, which is open to initiate HPCI turbine operation upon receipt of a Reactor Low Level 2 or High Drywell Pressure signal, is not adversely impacted by the modification. FSAR Section 6.3 and 7.3.1, and Chapter 15 have been reviewed in making this determination.
- III. No. The modification does not reduce the margin of safety as defined in the basis for any Technical Specifications. The accident analysis assumes a HPCI response time which together with HPCI design parameters (flow rate, pressure) defines HPCI delivery. The HPCI System delivery time is unaffected by this modification since the stroke time remains below the 20 second requirement. The integrity of the valve pressure boundary, hydraulic characteristics, and valve seat leakage rate is not affected by the actuator gearset replacement. Technical Specifications bases 3.5.1 was reviewed in making this determination.

SER NO: 01-272

CROSS REFERENCE: NL-99-3042, Unit 1 and Unit 2

DESCRIPTION OF CHANGE:

The scope of this modification is the replacement of Valcor solenoid operated valves (SOVs) on twenty-four (24) air-operated valves (AOVs) In the Reactor Core Isolation Cooling (RCIC), High Pressure Coolant Injection (HPCI), Drywall Floor & Equipment Drain to Liquid Radwaste Collection, and Reactor Building Chilled Water systems.

SUMMARY:

- I. No. The proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR. The replacement solenoid valves are considered a design upgrade to provide a more reliable solenoid valve and therefore increase the reliability of the associated air-operated valves. The SOV, the associated AOVs, and their stroke times are not included in any accident analysis or the calculation of offsite dose. The accidents described in FSAR Sections 6.2, 6.3, and 15.0 were reviewed to form the basis for this response.
- II. No. The proposed action does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR. The replacement direct acting solenoid valve is of similar form, fit and function, requiring the same electrical power source and air/gas supply requirements as the solenoid that it will replace. Failure modes of the replacement solenoid on loss of power, loss of air/gas supply, coil failure; will still result in a fail safe (fail closed/venting air) position resulting in the same air-operated valve fail closed position existing prior to the modification. SOV replacement does not affect AOV seismic qualification. There are no effects to other systems or components that have safety functions that could lead to their failure in a different way that could contribute to an accident or malfunction of a different type. Chapters 6 and 15 of the FSAR were reviewed to form the basis for this response.
- III. No. The proposed action does not reduce the margin of safety as defined in the basis for any Technical Specification. Technical Specifications 3.5 (HPCI/RCIC) and 3.6.1.3 (Primary Containment Isolation Valves) were reviewed to form the basis for this response. The affected HPCI/RCIC SOVs and their associated AOVs are not discussed in Tech Spec section 3.5, or the associated bases. The remaining valves are containment isolation valves shown on Table B 3.6.1.3-1 in the Tech Spec Bases. The Tech Spec Bases Maximum Isolation Times will be increased for HV-28782A1, A2, B1, B2 (from 6 to 12 seconds) and HV-28792A1, A2, B1, B2 (from 4 to 8 seconds) resulting in a change to Table B 3.6.1.3-1. These stroke times are not used in any accident analysis or in the calculation of offsite dose.

SER NO: 01-273

CROSS REFERENCE: DCP 226426, Unit 2

DESCRIPTION OF CHANGE:

The scope of this modification is to add permanent attachment lugs (PALs) at various locations in the Unit 2 drywell to facilitate the installation of temporary radiation shielding.

SUMMARY:

- I. No. A review of FSAR for the evaluated design basis accidents has been performed. Based upon this review, this modification has no adverse effect upon the function of the drywell platform steel and various supports to which the PALs are attached. The PALs and the structures/supports that they are attached to have been evaluated and qualified to the applicable design requirements. The PALs, the supports structures that they are attached to and the temporary radiation shielding have been designed so as not to become Safety Impact Items (SII). This modification does not change any drywell design parameter or design requirement or after any system, function or boundary. The actions taken by this modification do not impact any design basis accident. Therefore, this modification does not result in an Increase in probability of occurrence or the consequences of an accident previously evaluated in the FSAR.

This modification has been assessed for potential Impacts to systems, structures and components required for safe shutdown of the plant. The PALs and the support structures that they are attached to have been designed such they do not become SII during unit outages, when they will be loaded with the temporary radiation shielding. The radiation shielding has been designed to preclude its becoming a SII. Prior to unit operation, all temporary radiation shielding will be removed and only the PALs will remain in the drywell. This modification does not change any failure mechanisms for structures components inside the drywell. Therefore, this modification does not result in an increase in the probability of occurrence or the consequences of a malfunction of equipment important to safety previously evaluated in the FSAR.

- II. No. This modification has been assessed for potential impacts to drywell systems, structures and components. The additional loads due to the PALs have been evaluated and they do not introduce any new failures that would adversely affect the safety functions of the components. Based on this assessment and the FSAR review, the actions of this modification do not create any new failure modes or mechanisms for the drywell systems, structures or components. Therefore, this modification does not create the possibility for an accident or malfunction of a different type than previously evaluated in the FSAR.
- III. No. A review of Technical Specifications and Bases has been performed for the changes addressed in this evaluation. No specific requirements for drywell platforms or structural supports are addressed. Based upon this review and discussions provided above, it was determined that this modification does not reduce the margin of safety as defined in the Bases for any Technical Specification.

SER NO: 01-274

CROSS REFERENCE: DCP 225753, Unit 2

DESCRIPTION OF CHANGE:

Install a new Leading Edge Flow Meter (LEFM) feedwater flow measurement system to provide more accurate feedwater flow and temperature inputs to the Plant Integrated Computer System (PICSY) and subsequently to the Powerplex: computer for use in calculating core thermal power.

SUMMARY:

- I. No. This modification provides more accurate feedwater flow and temperature inputs to PICSY/Powerplex resulting in a more accurate calculation of core thermal power. The new feedwater flow and temperature inputs to PICSY/Powerplex are used in the same way as the inputs from the existing flow and temperature Instruments. The flow elements installed in the feedwater lines are designed to the same codes and standards and seismic environmental requirements as the corresponding feedwater line. An accident evaluated in the FSAR that is related to modifying the feedwater piping is a Feedwater Line Break Outside Containment (FSAR Section 15.6.6). This accident analysis assumes an instantaneous, circumferential 30" diameter feedwater header break. The analysis envelops the worse case failure of any of the feedwater flow element measurement sections installed in the 18" feedwater pump discharge lines. Failure of the new flow or temperature signals would result in the same loss of data that exists prior to the modification, resulting in loss of data for performance of the core thermal power calculation. However, this loss of this data could in no way have any effect on the offsite dose to the public. Therefore, this modification does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment Important to safety, as previously evaluated in the FSAR.
- II. No. This modification provides more accurate feedwater flow and temperature inputs to PICSY/Powerplex resulting in a more accurate calculation of core thermal power. The new feedwater flow and temperature inputs to PICSY Powerplex are used in the same way as the existing flow and temperature instruments. All failures possible with the new system are the same as the failures associated with the existing instruments (i.e. loss of signal, fail high, fail low, inaccurate data, spurious signals). The addition of the new feedwater instrumentation has no effect on other systems or components that have safety functions that could lead to their failure in a different way that could contribute to an accident or malfunction of a different type.
- III. No. The feedwater flow and temperature inputs are not part of any Technical Specification, or in any of their bases. The increased accuracy of the LEFM System results in a more precise calculation of core thermal power. As power measurement precision increases, the chances of an overpower incident decreases. The on-line diagnostics provide information that verifies that the parameters of the LEFM are within acceptable limits, verifying that the meter accuracy is unchanged. This is an improvement over the existing conventional venturi based flow measurement system in that the meter parameters will now be constantly verified throughout the entire fuel

cycle. Therefore, the proposed action does not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-275

CROSS REFERENCE: DCP 99-9012, Unit 2

DESCRIPTION OF CHANGE:

This modification adds a new pipe support on the "A" reactor recirculation pump seal water pipe (SPDCB211-1) run to reduce the potential for pipe cracks due to high vibration and replaces 1" manual valve 243F014A with one better suited for maintenance.

SUMMARY:

- I. No. Based upon a review of the SAR (including FSAR Section 3.9, 12.2, 15 & ODCM), the initiating event which includes the components affected by this modification is the recirculation pump shaft break and the probability of this event occurring is not increased because this modification does not change the interface between the recirculation motor stand and the shaft. The failure probability of the affected piping is decreased because the support added reduces the probability of pipe cracking due to vibration, while not increasing the probability of pipe cracking due to other failure mechanisms. The support capability of the motor stand to which the new pipe support is mounted is not degraded as a result of this modification based upon location of the bolts and evaluation by the vendor. The affected components interface with the drywell and the recirculation pumps, which perform safety-related functions. The probability of a malfunction of this equipment is not increased because their interface is not affected and there is no change in the fluid properties within the piping which would result in an increase in the rate of drywell leakage. There are no new radiological pathways created and no radiological increase from existing pathways caused by this modification, as a result of an accident or a malfunction of equipment. Therefore, this modification will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.
- II. No. The possible failure modes of the modified piping and motor stand were evaluated for new impacts upon plant equipment and previously evaluated initiating events (evaluated in the SAR). No new impacts were identified. The modified system configuration conforms to the original construction codes and standards. The interfaces with equipment important to safety are unaffected by this modification since no new impacts were identified. Therefore, this modification will not result in an accident or malfunction of a different type being created for equipment important to safety.
- III. No. Based upon a review of the design parameters involved with this modification, none which serve as the basis for a margin of safety as presented in the SSES Technical Specifications, are adversely affected by the modifications. Therefore, this modification does not reduce any margin of safety which serves as the basis for any Technical Specification.

SER NO: 01-276

CROSS REFERENCE: NL-00-010, Unit 1 and Unit 2

DESCRIPTION OF CHANGE:

This change revises the High Pressure Coolant Injection (HPCI), Residual Heat Removal (RHR) And Core Spray Pump Net Positive Suction Head Available (NPSHA) FSAR Values.

SUMMARY:

- I. No. The proposed changes describe the worst case operating conditions for the RHR and Core Spray pumps, which occur in the long term phase of a design basis Loss Of Coolant Accident (LOCA). These changes result in slightly more restrictive operating conditions for the RHR and Core Spray pumps. However, these conditions are still within the pump vender and GE operating requirements. In addition, PP&L's revised engineering evaluation of Question 211.296 concluded that localized flashing in the Emergency Core Cooling System (ECCS) pump suction lines will not occur under worst case postulated accident conditions.

The proposed changes do not pertain to any initial plant conditions initial system configurations, nor initial circumstances assumed in the SSES accident analyses and do not in any way affect or diminish the reliability and structural integrity of the RHR and Core Spray pumps and systems. Therefore, the changes proposed do not increase the probability of occurrence or the consequences of an accident or equipment malfunction, as previously evaluated in the FSAR.

- II. No. The proposed changes do not pertain to any initial plant conditions, initial system configurations, nor initial circumstances assumed in the SSES accident analyses, These changes are administrative in nature and in no way affect the physical plant. Furthermore, PP&L's engineering evaluation of the RHR and Core Spray system NPSHa concludes that the operating conditions remain well within the design envelope of the associated components and piping.

The consequences of numerous credible worst case single failures which affect the ECCS and decay heat removal functions are already addressed in the SSES FSAR. Considering that bounding single failures are already postulated in the FSAR, and also that the proposed change does not impose any additional operating challenges to these systems, the proposed changes do not create any new modes of pump or system failure. Therefore, the changes proposed do not create a possibility for an accident or malfunction of a different type than those evaluated previously in the SAR.

- III. No. The Bases for the SSES Technical Specifications contain no specific reference to RHR and Core Spray pump NPSHa. However, with the proposed changes, the operating conditions for the RHR and Core Spray systems will remain well within the design envelope of the associated components and piping. The safety functions of these systems are therefore unaffected. The margin of safety defined in the bases of the SSES Technical Specifications for all potentially affected safety functions will therefore be maintained.

SER NO: 01-277

CROSS REFERENCE: DCP 278004, Unit 2

DESCRIPTION OF CHANGE:

This modification eliminates a socket welded elbow, changes a portion of SP-DCB-220-1 piping from 3/4" to 1", changes weld profiles, and modifies an existing pipe support on the Unit 2 "A" reactor recirculation pump upper seal chamber pressure indication line to reduce the potential for weld failure due to high vibration.

SUMMARY:

- I. No. Based upon a review of the SAR (including FSAR Sections 3.9, 12.2, 15 & ODCM), the initiating event which includes the components affected by this modification is the recirculation pump shaft break and a small break LOCA. The probability of these events occurring is not increased because these modifications do not change the interface between the recirculation motor stand and the shaft. The support capability of the motor stand to which the redesigned pipe support is mounted is not degraded as a result of this modification based upon location of the bolts and input provided by the pump vendor. The affected components interface with the drywell and the recirculation pumps, which perform safety-related functions. The probability of a malfunction of this equipment is not increased because their interface is not affected and there is no change in the fluid properties within the piping which would result in an increase in the rate of drywell leakage. There are no new radiological pathways created and no radiological increase from existing pathways caused by this modification, as a result of an accident or a malfunction of equipment.
- II. No. The possible failure modes of the modified piping were evaluated for new impacts upon plant equipment and previously evaluated initiating events (evaluated in the SAR). No new impacts were identified. The modified system configuration shall conform to the applicable construction Codes and Standards. The interfaces with equipment important to safety are unaffected by this modification since no new impacts were identified. Therefore, this modification will not result in an accident or malfunction of a different type being created for equipment important to safety.
- III. No. Based upon a review of the design parameters involved with this modification, none which serve as the basis for a margin of safety, as presented in the SSES Technical Specifications, are adversely affected by the modifications. Therefore, this modification does not reduce any margin of safety which serves as the basis for any Technical Specification or Technical Requirement.

SER NO: 01-278

CROSS REFERENCE: NL-00-034, Unit 1 and Unit 2

DESCRIPTION OF CHANGE:

The proposed change will run the unaligned D Emergency Diesel Generator (EDG) in accordance with OP-024-001 section 3.23 with the exception that a load bank will be connected to the generator for load testing.

This evolution will permit post-maintenance testing to be performed following electronic governor and hydraulic/mechanical actuator replacement for D EDG in the emergency mode of operation without necessitating the isolation of either the 1D or 2D Engineered Safeguard System (ESS) bus.

SUMMARY:

- I. No. The consequences of the proposed action are bounded by existing accident analyses and the proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.

Neither a postulated loss of the Emergency Service Water (ESW) System nor a postulated loss of the Emergency Diesel Generators are initiating events for a loss of coolant accident or the loss of offsite power.

A postulated total loss of the ESW System would increase the consequences of a LOCA or a LOOP; each loop of ESW is still fully capable of mitigating these accidents and the plant is analyzed for the loss of one loop of ESW. The proposed change affects only one loop of ESW. Entry into LCO 3.7.2 for the affected loop of ESW when blocking open the supply and return valves to an unaligned diesel generator heat exchanger eliminates the requirement of postulating an additional single failure of the other loop of ESW.

The LOCA/LOOP analysis assumes the loss of one diesel generator. Running an unaligned diesel generator unloaded does not affect the operation of the four (4) remaining aligned diesel generators. Entry into LCO 3.7.2 for the affected loop of ESW when blocking open the supply and return valves to an unaligned diesel generator eliminates the requirement of postulating the additional single failure of a diesel generator.

- II No. The proposed action does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.

The loss ESW and the loss of diesel generators are not initiating events for any accidents. The loss of one loop of ESW and the loss of one diesel generator have been evaluated in the accident analyses. Both loops of ESW remain operable and available while an unaligned diesel is running. The proposed action does not affect the operation of the four (4) remaining diesel generators. Furthermore, entry into LCO 3.7.2 for the

affected loop of ESW when blocking open the supply and return valves to an unaligned diesel generator heat exchanger eliminates the requirement of postulating an additional single failure of any other equipment or system.

- III. No. The proposed action does not reduce the margin of safety as defined in the basis for any Technical Specification, and in fact the proposed action increases the net margin of safety by a factor of 3.

The operability of the Residual Heat Removal (RHR) Service Water System is based in part on an operable Ultimate Heat Sink. The operability of the Ultimate Heat Sink is based on having a minimum water level at the overflow weir of 678 feet 1 inch above mean sea level and a maximum water temperature of 85°F. The proposed action does not affect the water level or the maximum water temperature of the spray pond with both sets of spray arrays available and operable.

LCO 3.7.2.A applies to the loss of one ESW pump in each subsystem. LCO 3.7.2.B applies to one or two ESW subsystems not capable of supplying ESW flow to at least three required DGs. The proposed action of blocking open the supply and return valves to one unaligned diesel generator does not apply to either of the above conditions.

LCO 3.7.2. C applies to one ESW subsystem inoperable for reasons other than Condition B. The Action 3.7.2.C.1 is to restore the affected subsystem to operable status within 7 days. The basis for this action is that with the unit in this condition, the remaining operable ESW subsystem is adequate to perform the heat removal function. However, the overall reliability is reduced because a single failure in the operable ESW subsystem could result in the loss of ESW function. The 7 day completion time is based on the redundant ESW system capabilities, the low probability of an accident occurring during this time period, and is consistent with the allowed completion time for restoring an inoperable core spray loop, Low Pressure Coolant Injection pumps and control structure chiller.

SER NO: 01-279

CROSS REFERENCE: DCP 277092, Unit N/A

DESCRIPTION OF CHANGE:

This change provides the wiring configuration (for the power feeders and miscellaneous 120 VAC only) for an unaligned D Diesel run connected to a test load bank.

SUMMARY:

- I. No. The proposed action does not affect the spectrum of postulated events for which transients or anticipated operational occurrences and accident conditions were analyzed. The proposed bypass maintains the design basis operation of the D Diesel generator (reference FSAR 8.3.1). There is no increase in the probability of an accident, since the diesel generator function remains the same. There are no new safety concerns or conditions not already evaluated or discussed in Sections 6 and 15 of the FSAR. This bypass does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.
- II. No. The proposed changes do not involve a postulated initiating event that would create the possibility of an accident of a different type. The proposed action will not affect any structure, system, or component in performing its safety function. The D Diesel generator connected to the test load bank does not create a possibility for an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.
- III. No. The AC power supplies necessary to meet Technical Specification requirements are listed in Technical Specification Table 3.8.7-1. This bypass is performed on the D Diesel generator, which has been substituted by the E Diesel and isolated from the plant distribution system. While substituted, the D Diesel is not required for operation or shutdown of the unit or for mitigation of the consequences of an accident. In addition, no electrical bus or control logic connection to any Technical Specification related power supply is impacted. Therefore, the margin of safety is not reduced.

SER NO: 01-280

CROSS REFERENCE: DCPs 99-3051, 99-3052, 99-3053, 99-3056, 99-3057, Unit 1 and Unit 2

DESCRIPTION OF CHANGE:

This change replaces existing temperature, flow vibration and eccentricity recorders with Yokogawa digital programmable type recorders. Recorders being replaced are TRE411R605, TRSE111R601, FRE111R608, TR11966, XR12728, TRE412R605, TRSE112R601, FRE112R608, TR21966 and XR22728 located in 1C601, IC668, 2C601 and 2C668.

SUMMARY:

- I. No. The proposed modifications do not affect any of the postulated initiating events for which transients or anticipated operational occurrences and accident conditions were analyzed (Ref. FSAR Chapter 6, and Chapter 15, FPRR. Design Assessment Report, Current Reload Analysis and NUREG-0776). The proposed change does not involve a precursor of, or contribute to, any evaluated accidents involving offsite dose. These changes do not adversely affect any safety-related plant systems or components. These changes have no adverse effect on accident scenarios and do not increase the potential of a malfunction of equipment important to safety. These modifications will not increase challenges to safety systems assumed to function for any accident analysis.

The proposed change will allow operators to continue to monitor and record all of the existing variables directly on the replacement recorders. In addition, the replacement recorders will continue to be powered from the existing 120 VAC Instrument Distribution panels. Therefore, the proposed modifications do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR.

- II. No. This modification involves replacing old and obsolete temperature, flow, vibration and eccentricity recorders with new and more reliable recorders and this does not introduce the possibility of new failure initiators. The existing AC Instrument power supplies will be used. Electrical separation will be in accordance with PP&L Specifications and FSAR Chapters 8.3.1.11.4. The recorder software is year 2000 compliant. The functionality of data display and alarm circuits will not change. Therefore, the review concluded that the modification would not create the possibility for an accident of a different type.

The proposed modifications do not adversely impact the dynamic qualification of the existing panels and do not adversely affect their power sources. A failure of the new recorders produces the same results as failure of the existing recorders. Therefore, the proposed change does not create the possibility of an accident or malfunction of a different type than any evaluated previously in the FSAR.

- III. No. Tech Specification sections 3.6 and 3.5 and their bases and Technical Requirements Manual were reviewed to make this determination. The proposed action of replacing Control Room recorders will provide the operator with more reliable temperature and flow information. The proposed modifications have no impact on the Technical Specifications, since no circuit or equipment modifications degrade the associated instrumentation channels. Therefore, the proposed changes do not affect the margin of safety as delineated in the Technical Specifications or Technical Requirements.

SER NO: 01-281

CROSS REFERENCE: DCP 226544, Unit 2

DESCRIPTION OF CHANGE:

The proposed change modifies the Suppression Pool Level instrumentation circuitry by adding a Class 1E electrical isolation device, such that Wide Range Transmitter LT-25776A is electrically isolated from the postulated effects of a fire in the Control Room.

SUMMARY:

- I. No. The proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR. This modification has no adverse impact on the normal Safety Functions of the Suppression Pool, its auxiliary systems, or any other equipment important to safety. The addition of the qualified passive isolation device in 2C661A1 ensures that the Wide Range Suppression Pool Water Level Transmitter LT-25776A is available to perform its normal signal processing functions and remains functional to achieve and maintain Safe Shutdown in the event of a Control Room fire. The proposed action does not degrade the Post Accident Monitoring functions, as required by Reg. Guide 1.97, and does not degrade the availability of instrumentation during a Station Blackout (not part of the plant design basis) to less than that of the existing instruments. The transfer of control to the Remote Shutdown Panel is unaffected and the availability of the Wide Range Suppression Pool Water Level indication is ensured by this action. Chapters 6, 7, and 15 of the FSAR and the FPRR were reviewed to make this determination.
- II. No. The proposed action does not identify a postulated initiating event that would create the possibility of an accident or malfunction of a different type. There are no new scenarios that could be postulated that would create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR. Chapters 6, 7, and 15 of the FSAR and the FPRR were reviewed to make this determination.
- III. No. The proposed action does not affect the operability requirements of any safety related system component as governed by Technical Specification or Technical Requirements Manual. The margin of safety as defined in the basis of the Technical Specification or Technical Requirements Manual is not reduced by the proposed action. Technical Requirements Manual Section 3.6.3, Technical Specifications Sections 3.3.3.1, 3.3.3.2, 3.6.2.2 and Bases, and FSAR Sections 6.2 and 8.3 were reviewed to make this determination.

SER NO: 01-282

CROSS REFERENCE: DCP 2000-002, Units 1 and 2

DESCRIPTION OF CHANGE:

The proposed action installs a Temporary Modification on the Common Recombiner system to automatically open HV06980, Common Motive Steam Jet Condenser Offgas Outlet Valve, when the Common Recombiner is placed in the STANDBY MODE. This will allow venting pressure that is building up in the Common Recombiner skid to one of the operating units charcoal adsorber trains.

SUMMARY:

- I. No. This modification will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety.

FSAR Section 15.7.1.1 describes the Ambient Charcoal Offgas Treatment System Failure. The section identifies the following events, which could lead to a gross failure of the Offgas Treatment System:

- (1) A seismic occurrence-greater than design basis
- (2) A hydrogen explosion in housing unit
- (3) A fire in the filter assembly
- (4) Failure of spatially related equipment

Providing a vent pathway for the Common Recombiner when in the STANDBY MODE will have no effect on the probability of occurrence of these events, and will not increase the consequences of these events. The offgas system will continue to be monitored for hydrogen concentration and process temperatures, in accordance with plant procedures. The system will still be capable of processing noncondensable radioactive offgas from the main condenser. The flow from the system will still be monitored by the Turbine Building SPING exhaust vent system.

- II. No. This modification does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR. The additional flow from the Common Recombiner to the in service recombinder will be insignificant. The failure of the valve to stay open in the STANDBY MODE would result in an isolation of the Common Recombiner, which is the pre-modification configuration.
- III. No. This modification does not reduce the margin of safety as defined in the basis for any Technical Specification.

This conclusion is based upon a review of Technical Specifications Basis B 3.7.5, Main Condenser Offgas. This basis addresses the need to restrict the gross radioactivity rate of noble gases from the main condenser, to assure that the total body exposure to an individual at the exclusion area boundary will not exceed a small fraction of the limits of 10 CFR Part 100. The monitoring requirements and limits will not be changed by this modification.

SER NO: 01-283

CROSS REFERENCE: DCP 225636, Unit 2

DESCRIPTION OF CHANGE: The proposed action replaces the 30 amp control power fuses C72A-F45A and C72A-F46A in panel 2C609 located in the Upper Relay Room and C72A-F45B and C72A-F46B in panel 2C611 located in the Lower Relay Room with 5 amp fuses, thereby providing coordination with the 20 amp feeder breakers, 2D614 Breaker 01 and 2D624 Breaker 11.

SUMMARY:

- I. No. Replacing the control power fuses for the Reactor Recirc Pump Trip (RPT) Breaker 3A and 4A RPT control circuits in 2C609 and 2C611, while not changing the control logic does not introduce a new device or source of power which would compromise the function of the safe shutdown components. The control power fuses coordinate with the 125 VDC Distribution Panel supply circuit breakers 2D614 Breaker 01 and 2D624 Breaker 11 and provide adequate protection for their control circuit cables. As evaluated in calculations, the new 5 amp fuse rating is acceptable for the existing load. Maintaining the manual SCRAM capability through operation of the SCRAM Pilot Solenoid Valves, the Scram Discharge Volume (SDV) isolation capability via the SDV Vent and Drain Pilot Solenoid Valves and manual initiation of the RPT function via closure of the 13.8 KV circuit breakers 2A10110 and 2A10210 maintains the ability to safely shutdown the reactor within the criteria specified in Appendix R Section III.G. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR is not increased by the proposed action.
- II. No. There are no control logic changes to RPT Breaker 3A and 4A RPT control circuits. The new 5 amp fuse rating is acceptable for the existing load. For the fire in Fire Zone 2-1D, the automatic RPT and automatic Back-Up SCRAM functions may be disabled by the postulated fire. Based on the Fire Hazards Analysis, the manual SCRAM function via the SCRAM Pilot Solenoid Valves and the ability to isolate the SDV via the SDV Vent and Drain Pilot Solenoid Valves remains available from the Control Room. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR is not created.
- III. No. Operability of the RPT Instrumentation is addressed by Technical Specification Section 3.3.4.1, "End of Cycle Recirculation Pump Trip (EOC-RPT) Instrumentation". Replacement of the 30 amp fuses on the RPT Breaker 3A or 4A RPT control circuit with 5 amp fuses does not affect the margin of safety provided by the EOC-RPT instrumentation, as the RPT control logic and setpoints are not being changed. The operator action being added for the Reactor Core Isolation Cooling (RCIC) Pump Room, Fire Zone 2-1D of tripping the Reactor Recirc Pumps prior to entering shutdown cooling is an action currently used in the Appendix R Safe Shutdown Analysis in other fire zones. This action is the only operator action currently required in Fire Zone 2-1D. Therefore, the addition of this operator action for the RCIC Pump Room, Fire Zone 2-1D does not place an additional burden on the operator responding to the fire and, as such, does not represent a reduction in the margin of safety.

SER NO: 01-284

CROSS REFERENCE: DCPs 275272/275273/275274, Units 1 and 2

DESCRIPTION OF CHANGE:

This modification will replace the existing SS-5G solid state trip unit with an SS-4G device on various load center cubicles as a result of a 10CFR Part 21 electrical component deficiency identified by Asea Brown Boveri (ABB).

SUMMARY

- I. No. The proposed action does not affect the spectrum of postulated events for which transients or anticipated operational occurrences and accident conditions were analyzed. The proposed modification maintains the design basis operation of the above mentioned load centers. There is no increase in the probability of an accident, since load center function remains the same. There are no new safety concerns or conditions not already evaluated or discussed in Sections 6 and 15 of the FSAR. This modification does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR. FSAR Sections 15.2.6.15A and 8.3.1.2 were reviewed.
- II. No. The proposed changes do not involve a postulated initiating event that would create the possibility of an accident of a different type. The proposed action will not affect any structure, system, or component in performing its safety function, because no electrical bus or logic interconnection with any safety-related equipment occurs. Since the load center circuit breaker basic function does not change as a result of this modification, this modification does not create a possibility for an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR. FSAR Section 8.3 was reviewed.
- III. No. The AC power supplies necessary to meet Technical Specification requirements are listed in Technical Specification Table 3.8.7-1. The modification related 480 VAC load centers are not listed as necessary, nor is it required for operation or shutdown of the unit or for mitigation of the consequences of an accident. In addition, no electrical bus or control logic connection to any Technical Specification related power supply is impacted. The design basis operation of the modification related load centers remain the same. Therefore, the margin of safety is not reduced.

SER NO: 01-285

CROSS REFERENCE: DCP 270711, Unit 2

DESCRIPTION OF CHANGE: This change installs a new make and model Reactor Core Isolation Cooling (RCIC) Topaz inverter for ES-24901. The new unit is the GE recommended replacement. In addition, a cooling fan is to be installed in the metal enclosure (TB-1397) that houses ES-24901.

SUMMARY:

- I. No. The proposed action does not affect the spectrum of postulated events for which transients or anticipated operational occurrences and accident conditions were analyzed. The proposed action does not change the function of the RCIC System as referenced in FSAR Sections 5.4.6 & 7.1.2a.1.18 nor does it alter the Containment Isolation System as referenced in FSAR Section 6.2.4. There are no new safety concerns or conditions not already evaluated or discussed in Sections 6 and 15 of the FSAR. This modification does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.
- II. No. The proposed changes do not involve a postulated initiating event which would create the possibility of an accident of a different type. The proposed action will not affect any structure, system, or component in performing its safety function. Since the basic function of the inverter (which includes providing a reliable source of power for the RCIC speed control circuitry) will not change as a result of this modification, this modification does not create a possibility for an accident or malfunction of equipment important to safety, as previously evaluated in the SAR
- III. No. The RCIC System is identified in the Technical Specifications in Section 3.5.3. The basis for this technical specification states that the RCIC System is provided to assure adequate core cooling in the event of reactor isolation from its primary heat sink and the loss of feedwater flow to the reactor vessel without requiring actuation of any of the Emergency Core Cooling System (ECCS) equipment. The proposed action maintains this licensing commitment by ensuring system design basis operation by having reliable sources of power.

Remote Shutdown Monitoring Instrumentation, as referenced in Technical Specification 3.3.5.2, includes RCIC turbine speed/pump flow as a required instrumentation channel. ES-24901 provides an alternate power supply for this channel. The commitment to provide a stable power supply to ensure operability of this channel is maintained.

All RCIC related automatic isolation valves that breach primary containment, including HV-249F007, HV-249F008, HV-249F088, HV-249F062, and HV-249F084 are governed by Technical Specification Table B3.6.1.3-1. The proposed action does not degrade the isolation signals, nor do they change the valve stroke times since no scheme interconnection occurs.

Therefore, based upon review of Technical Specifications, including sections 3.5.3 - RCIC System, 3.3.3.2 -Remote Shutdown System, and 3.6.1.3 - Primary Containment Isolation Valves, the proposed action does not create any new failure modes and maintains the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-286

CROSS REFERENCE: DCP 236819, Unit 2

DESCRIPTION OF CHANGE:

This evaluation discusses the safety aspects associated with the removal of Motor-Operated Valve (MOV) compartment space heaters which have been de-energized by various modifications and de-energizing and removal of the remaining MOVs space heaters in environmentally controlled areas. The MOV space heaters will only be removed from valves located in controlled environments where condensation is not an issue.

SUMMARY:

- I. No. The design change provided by this modification will be in accordance with the applicable design criteria and operational requirements as specified in the SAR and all applicable commitments will be satisfied; therefore, no new accident precursors will be created. The design will not impact the operability of the MOVs and they will continue to perform their safety-related functions. No new failures will be created by the action taken via this modification. Therefore, the proposed action does not create a possibility for an accident or malfunction of a different type than any evaluated in the SAR. There are no new radiological pathways created and no radiological increase from existing pathways will be caused by this modification as a result of an accident or a malfunction of equipment. Chapters 6 and 15 of the FSAR were reviewed.
- II. No. The design change provided by this modification will be in accordance with the applicable design criteria and operation requirements as specified in the SAR and all applicable commitments will be satisfied; therefore, no new accident precursors will be created. This design will ensure the operability of the MOVs. The MOVs will continue to perform their safety functions as required by Technical Specifications. No new equipment failure modes will be created by the actions taken via this modification. Therefore, the proposed actions do not create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR. Chapters 6 and 15 and Section 8.3.1.11.4 were reviewed.
- III. No. The removal or de-energizing of MOV compartment space heaters will be in accordance with the applicable design criteria and operation requirements as specified in the FSAR. All applicable commitments will be satisfied. The modification will not affect the operability or any safety function of the MOVs. The MOVs will continue to perform their safety function as required by Technical Specifications. Therefore, this modification does not reduce any margin of safety which serves as the basis for any Technical Specification or Technical Requirement.

SER NO: 01-287

CROSS REFERENCE: LDCN 3208, Unit 1 and Unit 2

DESCRIPTION OF CHANGE:

The action of this change is to revise Technical Specification Bases Section 3.3.1.1.2.d to delete the phrase: "an APRM module is unplugged, the electronic operating voltage is low,"

The purpose of this change is to delete the description of functions and circuitry from the Tech Spec Bases which do not require periodic surveillance but could be interpreted as such.

SUMMARY:

- I. No. The two functions discussed in the Tech Spec Bases do not need to be surveilled. In the case of the voltage monitoring circuit, manual surveillance is sufficient to monitor for equipment failure in lieu of a monitoring circuit. In the case of INOP on module removal, detection of module removal is inherently provided by the design of the Average Power Range Monitors (APRMs) themselves and need not specifically be surveilled.

The APRMs will perform their function as designed. Therefore, the requested change will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.

- II. No. Neither the design nor the operation of the APRMs is changed by the LDCN. No new requirements for monitoring or surveillance have resulted from this evaluation. Therefore, this action does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.
- III. No. This evaluation determines that two functions included in the Tech Spec Bases do not require surveillance and, therefore, deletion of these functions from the Bases to avoid confusion is appropriate. Neither the design nor the design requirements of the APRMs has been changed. The way in which APRMs are surveilled has not been changed. The APRMs will perform per the design and as assumed in the accident analyses.

In addition, an examination of the Tech Spec Bases determined that no other bases mention these functions or implicitly rely on them.

Therefore, the requested action does not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-288

CROSS REFERENCE: DCP TMOD 280482, Unit 1

DESCRIPTION OF CHANGE:

The purpose of this temporary modification (T-MOD) is to bypass the C51-K24 relay. In lieu of automatic relay action, manual surveillance will be performed to monitor the power supply voltage. This will allow Average Power Range Monitor (APRM)-1C to be taken out of bypass without the risk of a half-scrum from the C51-K24 relay.

SUMMARY:

- I. No. As stated in the FSAR (reference Sections 7.2, 7.6 and Table 7.6-5), the APRM system trips are APRM downscale, APRM upscale alarm, APRM upscale thermal trip, APRM upscale neutron trip, and APRM inoperative.

The T-MOD affects the continuous monitoring of the + 20 VDC APRM-1C power supply voltage level by the C51-K24 relay. The actuation of the C51-K24 relay is an input signal to the APRM-INOP signal to Reactor Protection System (RPS). However, due to the reliability of the redundant power supplies and the surveillance frequency, APRM-1C will perform its safety functions as designed. Bypassing of the C51-K24 relay maintains the commitments to mitigate accidents while maintaining the health and safety of the public, and does not increase the probability of occurrence of an accident.

- II. No. The proposed T-MOD to bypass the C51-K24 relay does not change the APRM safety function. The APRM-INOP function will actuate any time the APRM mode switch is moved to any position other than 'operate', the APRM module is unplugged, or the APRM has too few Local Power Range Monitor (LPRM) (< 14) inputs. The APRM-1C power supply is redundant from the other channels and will be monitored via surveillances. The APRM-INOP signal will continue to actuate on power supply failure (zero volts). Therefore, the T-MOD does not create the possibility of an accident or malfunction of a different type than those previously evaluated in Chapters 6 and 15 of the FSAR.
- III. Tech Spec Bases B3.3.1.1.2.d discusses the APRM-INOP signal and states the signal provides assurance that a minimum number of APRMs are operable. The monitoring for low voltage, which is a input to the APRM-INOP signal, does not require surveillance per the Tech Spec Bases. Based on the high reliability of the redundant APRM power supplies, and the surveillance frequency, the bypassing of the low voltage monitoring relay does not reduce the margin of safety as defined in Tech Spec Bases Section TS B3.3.1.1.2.d.

SER NO: 01-289

CROSS REFERENCE: DCP 265007, Unit N/A

DESCRIPTION OF CHANGE:

This modification installs hatches in the Control Room Floor Cooling Return Air Duct to facilitate cleaning of the flow elements.

SUMMARY:

- I. No. FSAR Chapter 1.2, "General Plant Description", Chapter 6.5, "Fission Product Removal and Control System", Chapter 7.3, "Engineered Safety Feature Systems", Chapter 9.2, "Water Systems", and Chapter 9.4, "Air Conditioning, Heating, Ventilation and Cooling Systems", and FSAR Chapter 15, "Accident Analysis", were reviewed. There are no safety features or accident scenarios that would be affected by the addition of access hatches in the Control Room Floor Cooling return air ducts. Temporary opening of the duct to install the hatch does not constitute breach of the ventilation boundary and will only result in redistribution of air within the ventilation boundary, and precautions will be taken to prevent introduction of adverse fumes into the Control Room environment. Based on the above, this modification will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the FSAR.
- II. No. The proposed modification to construct access hatches in the Control Room Floor Cooling return air ducts does not create a possibility for an accident or malfunction of a different type than previously evaluated in the SAR because the proposed equipment maintains the system safety functions. Temporary opening of the duct to install the hatch does not constitute breach of the ventilation boundary and will only result in redistribution of air within the ventilation boundary, and precautions will be taken to prevent introduction of adverse fumes into the Control Room environment. This modification will not create the possibility of an accident or malfunction of a different type than any evaluated previously in the FSAR.
- III. No. This modification does not degrade the function of any plant system governed by Technical Specifications, Tech Spec Basis, or the technical Requirements manual. Dose rates in the Control Room during a Design Basis Accident will not be increased as a result of this modification. Technical Specification 3.7.3 and 3.7.4 were reviewed. Therefore, the actions taken by this modification will not reduce any margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-290

CROSS REFERENCE: NL-00-032, Unit 1 and Unit 2

DESCRIPTION OF CHANGE:

This change adds the grass-to-meat-to man airborne pathway, included specifics on Insignificant Effluent Pathways and deleted the requirement for a 1:15 multiplier of calculated doses in Step 2.4.2 of ODCM-QA-004, "Airborne Effluent Dose Calculations as unnecessarily conservative.

SUMMARY:

- I. No. No accidents as described in the FSAR could be caused, in whole or part, or could be exacerbated by these changes; therefore, there is no increase in the probability of occurrence, or the consequences of an accident or malfunction of equipment important to safety.
- II. No. No accidents of any type could be caused, in whole or part, or could be exacerbated by these changes; therefore, there is not a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.
- III. No. The changes to ODCM-QA-004 do not affect physical parameters, instruments, response times, redundancy and/or independence of components. Therefore, no margin of safety in the basis for any Technical Specification is reduced.

SER NO: 01-291

CROSS REFERENCE: DCPs 237874 and 237880, Unit 1 and Unit 2

DESCRIPTION OF CHANGE:

This modification removes bonnet vent piping from the reactor recirculation pump suction and discharge valves 2F023A and 2F031A, eliminates stem leakoff piping for the reactor recirculation bypass valves 2F032A and 2F032B, eliminates drain piping from recirc suction elbows, and adds a new pipe support on the "B" recirculation pump seal water drain and sample line to reduce the potential for pipe cracks due to high vibration.

SUMMARY:

- I. No. Based upon a review of the SAR (including FSAR Sections 3.9, 12.2, 15 & ODCM), the initiating event which includes the components affected by this modification is the recirculation pump shaft break and a small break LOCA. The probability of these events occurring is not increased because these modifications do not change the interface between the recirculation motor and the shaft and also eliminates piping that could cause a LOCA. The failure probability of the affected piping is decreased because the support added reduces the probability of pipe cracking due to vibration, while not increasing the probability of pipe cracking due to other failure mechanisms. The affected components Interface with the drywell and the recirculation pumps, which perform safety-related functions. The probability of a malfunction of this equipment is not increased because their interface is not affected and there is no change in the fluid properties within the piping which would result in an increase in the rate of drywell leakage. There are no new radiological pathways created and no radiological increase from existing pathways caused by this modification, as a result of an accident or a malfunction of equipment.
- II. No. The possible failure modes of the modified piping were evaluated for new impacts upon plant equipment and previously evaluated initiating events (evaluated in the SAR). No new impacts were identified. The modified system configuration conforms to the applicable construction Codes and Standards. The interfaces with equipment important to safety are unaffected by this modification since no new impacts were identified. Therefore, this modification will not result in an accident or malfunction of a different type being created for equipment important to safety.
- III. No. Based upon a review of the design parameters involved with this modification, none which serve as the basis for a margin of safety, as presented in the SSES Technical Specifications, are adversely affected by the modifications. Therefore, this modification does not reduce any margin of safety which serves as the basis for any Technical Specification or Technical Requirement.

SER NO: 01-292

CROSS REFERENCE: DCPs 253910 and TP-099-016, Unit 1 and Unit 2

DESCRIPTION OF CHANGE:

This change provides wireless telephone service to selected electronic telephone network (ETN) extensions in the Main Control Room, Shift Supervisor's Office, STA Office, Simulated Control Room and the Simulator Instructor room.

SUMMARY:

- I. No. Installation of the Control Room wireless telephone system will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR. The system will not affect the proper functioning of either safety or non-safety systems, or adversely affect either Security Plan or Emergency Plan communications equipment.
- II. No. Installation and use of the Control Room wireless telephone system will not create a new initiator or failure not considered in the FSAR. Testing will demonstrate that the system has no effect on any electronic controllers, indicators or recorders in safety and non-safety systems in the Main Control Room.
- III. No. Installation and use of the Control Room wireless telephone system does not reduce the margin of safety as defined in the basis for any Technical Specification. Use of the telephone system is not contained in any Technical Specification Basis or Technical Specification. The proposed system meets or exceeds all acceptability criteria of NUREG-0800 section 9.5.2 on Communications Systems.

SER NO: 01-293

CROSS REFERENCE: NL-00-033, Unit 1 and Unit 2

DESCRIPTION OF CHANGE: The purpose of this change is to add two additional potential Secondary Containment Bypass Leakage (SCBL) pathways in FSAR Table 6.2-15.

This change also deletes the word "potential" from the description of the SCBL pathways in Technical Specification Bases Section B3.6.1.3, SR 3.6.1.3.11. This is an editorial correction to the Technical Specification Bases section in order to eliminate any possible confusion with the use of the term in the FSAR.

SUMMARY:

- I. No. The proposed change involves adding the H₂O₂ Analyzer and Standby Liquid Control (SLC) penetrations to FSAR Table 6.2-15 as potential, but not valid SCBL pathways. These penetrations clearly do not represent valid SCBL pathways based upon the design of these systems as currently described in the FSAR (Section 18.1.21.3.2.4.3 for the H₂O₂ Analyzers & 9.3.5.2 for SLC). This change is being done, since these penetrations were omitted from the table previously, and should be listed for completeness. Consequently, the change is associated with adding descriptive information only, and does not involve a change to the design, operation, maintenance, or testing of equipment important to safety as described previously in the FSAR. This change is also an editorial change to Technical Specification Base Section B3.6.1.3, SR 3.6.1.3.11 to eliminate the use of the term "potential" when describing those SCBL pathways that have been determined to be valid and required to be tested. Consequently, this change is a clarification to the Technical Specification Bases to make them consistent with the description of SCBL pathways contained in the FSAR. Thus, the proposed actions do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.
- II. No. As noted above, these changes do not involve a change to the manner in which equipment important to safety is currently designed, operated, tested, and maintained, as described in the FSAR. Consequently, the proposed actions do not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.
- III. No. Technical Specification SR 3.6.3.11 requires that the combined leakage rate for all SCBL paths be verified to be ≤ 9 scfh when pressurized to \geq Pa, at a frequency in accordance with the Primary Containment Leakage Rate Testing Program. The bases for this Technical Specification surveillance requirement further notes that those potential SCBL pathways requiring testing are identified in the Primary Containment Leakage Rate Testing Program. The changes proposed identify that the new "potential" SCBL pathways are not valid SCBL pathways, thus the margin of safety for this surveillance is unaffected. The change to Technical Specification Bases B3.6.1.3, SR 3.6.1.3.11 to delete the word potential with regard to SCBL pathways, is editorial in nature and does not affect the margin of safety for this Technical Specification.

SER NO: 01-294

CROSS REFERENCE: DCP 231465, Unit 2

DESCRIPTION OF CHANGE: The proposed action is to replace the 10-amp control power fuses in 2C617 with 5-amp fuses for: 1) High Pressure Coolant Injection (HPCI) Division I Auto Isolation Relay Logic, 2) HPCI Condensate Pump Discharge and HPCI Steam Line Drain Isolation Valves, 3) Residual Heat Removal (RHR) Division I Relay Logic and 4) RHR Heat Exchangers 'A' Vent and Outlet Valves. All logic circuits have a common power service and route through the Control Room.

SUMMARY:

- I. No. The proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR. There are not impacts on equipment important to safety. The change has no adverse impact on the safety function of the RHR, HPCI, or 125 VDC systems. The control logic supplied from the fuses and the source of control power to the fuses do not change. The operability of the HPCI 54" high water level trip for a fire in the Control Room has been ensured by controlling the effects of multiple high impedance faults on 125 VDC Distribution Panel 2D614 Breaker 07. Chapter 6 and 15 of the FSAR, the FPRR, the Design Assessment Report, and the current Core Operating Limits Report were reviewed.
- II. No. Replacing the control power fuses in 2C617 for a select group of four control logics which have circuits routed through the Control Room, does not create a new initiating event because the main power source remains the same, and there is no change to the RHR or HPCI System control logic.

The consequences of a random single failure of the RHR, HPCI, or 125 VDC Systems are the same as the existing consequences. The new fuse size is acceptable for the existing load. The replacement fuses added by the proposed action are tested for continuity. No new components other than the fuses are being added by the proposed action. There are no control logic changes. Therefore, the proposed action does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.

- III. No. The proposed action does not make any changes to the RHR or HPCI setpoints, or control logic functions, which could impact the margin for safe operation of RHR or HPCI Systems. The operation and margin of safety for 2D614 is not changed by the proposed action. No new operator actions are added as a result of this proposed action. Technical Specification Sections 3.3.5.1, 3.4.8, 3.4.9, 3.5.1, 3.5.2, 3.6.2.3, 3.6.2.4, 3.9.7, and 3.9.8 were reviewed. Therefore, the possibility for a malfunction of a different type than any evaluated previously in the FSAR is not created.

SER NO: 01-295

CROSS REFERENCE: NL-00-038, Unit 2

DESCRIPTION OF CHANGE:

The purpose of this change is to provide instructions to perform a chemical decontamination of the Unit 2 Reactor Recirculation System to reduce the general radiation fields within the drywell.

SUMMARY

- I. No. The chemical decontamination of the Unit 2 Reactor Recirculation System piping will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR. The evaluation considered potential effects to the reactor coolant inventory (FSAR 15.6), the impact on the Reactor pressure boundary (FSAR 5.2), potential radioactive release from subsystem and components (FSAR 15.7) and physical impacts to the building and structure. The worst possible event causing loss of reactor coolant would be ejection or seal failure of a plug. This would result in an insignificant loss of reactor coolant from the cavity and have no impact on the ability to maintain adequate core cooling. Since the plugs are not seismically qualified, they could become dislodged during a seismic event. Under these conditions, the reactor pressure boundary would be maintained by closing the Reactor Recirculation System suction and discharge valves. The discharge bypass valve in the "A" recirculation loop is closed and de-energized and would remain closed during chemical decontamination. After the chemical decontamination project is complete, radioactive resins and filters will be transported to the Radwaste Facility for final processing. Those previously analyzed in FSAR 15.7.3 bound any potential accidents that could occur during this process.
- II. No. The chemical decontamination of the Unit 2 Reactor Recirculation System piping does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR. The evaluation considered the chemical degradation and effects on the reactor pressure vessel N1 nozzles and N2 nozzle thermal sleeves, the jet pump riser piping, and on all components in the reactor recirculation system. The evaluation considered potential chemical reactions, spills, the impact on the plant electrical distribution system and the impact of a seismic event.

Chemical reaction studies were performed to ensure that no toxic or hazardous byproducts would be formed from a chemical reaction between any of the decontamination chemicals with other materials that may be found in the drywell. Plant floor drains in the area and the drywell sump will be isolated to prevent spreading of the chemicals into the plant Radwaste System. Spills will be contained and cleaned by the site's Spill Response Team.

- III. No. The chemical decontamination of the Unit 2 Reactor Recirculation System piping does not reduce the margin of safety as defined in the basis for any Technical Specification. Technical Specifications were reviewed to determine potential impacts. No additional impacts were found, other than those previously evaluated as a result of the plug installation and removal process.

SER NO: 01-296

CROSS REFERENCE: NL-09-049, Rev. 1, Unit 1 and Unit 2

DESCRIPTION OF CHANGE: This change supports performance of local critical testing for the SSES units. Revisions were made to procedure RE-OTO-120 to better align the procedure with the GO steps regarding reactor period and coolant temperatures.

SUMMARY:

- I. No. Performance of the local criticality tests requires that the test rods be bypassed from the RSCS rod pattern logic and the Rod Worth Minimizer is programmed or bypassed to permit control rod withdrawals outside the guidelines of the Banked Position Withdrawal Sequence (BPWS). The test configurations are therefore evaluated with respect to potential control rod worths to assure that in the event of a postulated Control Rod Drop Accident (CRDA), the consequences would be no worse than those previously analyzed in the reload safety analysis.

Due to procedural controls, which include control rod coupling checks, control rod withdrawal verification by a second licensed operator, the verification of rod worth for the largest potential rod drop during the test, and the observance of in-core instrumentation response, the likelihood that a CRDA would occur as a result of this test is not increased.

Reactor Protection System operability, including APRM and IRM trips, will be required for this test, thus providing any required automatic shutdown in the event of a rapid and/or large positive reactivity insertion.

Therefore, the proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.

- II. No. FSAR Section 15.4.9 and reload safety analysis input parameters and initial conditions remain unaffected by the proposed local criticality tests; the proposed test does not adversely impact primary containment, secondary containment, control room habitability, Emergency Core Cooling Systems, the pipe break analysis, the overpressurization analysis, instrument response time, or class 1E distribution. Therefore, the proposed action does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. The applicable safety analyses and the Susquehanna Technical Specifications have been reviewed and no adverse impacts were identified as a result of performing the proposed local criticality tests. All actions are performed within the constraints of the existing Technical Specifications. Technical Specification 3.10.7 permits bypassing the requirements of the BPWS for a special test provided a second licensed operator verifies conformance with Technical Specifications and the test procedure. Procedural controls will also limit the potential for reactor periods < 30 seconds. Therefore, this change does not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-297

CROSS REFERENCE: NL-00-042, Unit 1 and Unit 2

DESCRIPTION OF CHANGE:

This change justifies leaving the internal surface of the Clarified Water Storage Tank (CWST), OT523, uncoated after maintenance. It also assesses changes to Clarified Water quality statements made in the FSAR

SUMMARY:

- I. No. The systems and components associated with the Clarified Water Storage Tank, OT523, have no safety function, are not important to safety, and are not 80-10 systems. Therefore, this change to OT523 cannot increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR. Water quality changes should be insignificant. Equipment operation will not be affected. Structural integrity will be assured through monitoring. Therefore, there will be no impact to systems supplied by the CWST. Reference FSAR Table 3.2-1 and Section 9.2.8.
- II. No. The systems and components associated with the Clarified Water Storage Tank, OT523, have no safety function, are not important to safety, and are not 80-10 systems. Therefore, this LDCN for the design change to OT523 cannot create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.
- III. No. The margin of safety as defined in the basis for any technical specification is not reduced. The Clarified Water system and any of the components supplied are not in the Tech Spec.

SER NO: 01-298

CROSS REFERENCE: DCPs 97-9114, 97-9115, Unit 1 and Unit 2

DESCRIPTION OF CHANGE:

This change replaces the Neutron Flux Monitoring System Average Power Range Monitor (APRM), Intermediate Range Monitor (IRM), Source Range Monitor (SRM) and Rod Block Monitor (RBM) recorders and selector switches.

SUMMARY:

- I. No. The proposed action does not affect any of the postulated initiating events for which transients or anticipated operational occurrences and accident conditions (FSAR Sections 7.1.2a.1.4, 7.2.1.1.4.2 a), 7.2.2.1.2.3.1.2, 7.2.2.1.2.3.1.7, 7.6.1a.5, 7.6.1a.5.6.1.1(4), Tables 3.2.1 & 7.1-1, and Chapter 15) were analyzed. It does not create a condition that could cause accident propagation. This change has no effect on any accident scenarios or malfunction of equipment important to safety, and has no effect on radiological consequences.

The proposed action does not degrade the post-accident neutron flux monitoring function required by Reg. Guide 1.97. The existing Neutron Monitoring System (NMS) meets the alternate criteria established in GE NEDO-31558. The proposed change will allow operators to monitor and record all of the APRM/IRM/SRM/RBM input channel signals (power level) directly on the replacement recorder(s) without using the selector switches. The proposed change will enhance overall NMS performance and reliability.

This change does not adversely affect any safety-related plant systems or components. These modifications will not increase challenges to safety systems assumed to function for any accident analysis.

Also, all NMS replacement recorders will be powered from the same 120VAC uninterruptible power supply as the existing Bailey recorders. Therefore, the proposed change does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the SAR.

- II. No. The subject NMS recorders have no safety-related function; they provide neutron flux information to the operators for normal operation and for post-accident monitoring (PAM). The replacement recorder software configuration is vendor tested for Verification and Validation (V&V) in accordance with IEEE 7-4.3.2-1993. On a loss of power, the replacement recorder will automatically return to recording mode (power up) upon power restoration with no operator action.

The proposed action provides electrical isolation between the APRM/IRM/RBM system Class 1 E analog interface signal circuits and non-Class 1 E replacement recorders by utilizing the existing Class 1E qualified analog isolators per separation requirements. Therefore, a recorder failure will not degrade safety-related APRM and IRM protective trip unit outputs.

No new failure modes result from these modifications. The proposed modifications to the panels do not adversely impact the dynamic qualifications of the existing panels. The proposed change does not therefore, create the possibility of an accident or malfunction of a different type than any evaluated previously in the SAR.

- III. No. Tech Spec 3.3.3.1, "Post Accident Monitoring (PAM) Instrumentation", specifies the operability and surveillance requirements (channel check and channel calibration) for neutron flux monitoring system channels. The PAM function for neutron flux is satisfied by any one channel A-F of APRMs in each division. However, Tech Spec Bases 3.3.3.1 will be revised to reinstate previously identified criteria of GE NEDO-31558A which provides alternate criteria for the NMS to meet the PAM guidance of Reg. Guide 1.97. Tech Spec Section 3.3.1.2, "Source Range Monitor". specifies minimum number of SRM channels for operability. The proposed action maintains the design basis function of the post-accident neutron flux monitoring function required by Reg. Guide 1.97, via APRM channels A-F. The overall performance of the NMS, including neutron-flux monitoring (PAM) instrumentation, remains same as original design. Therefore, the proposed action does not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-299

CROSS REFERENCE: NL-00-041, Units 1 and 2

DESCRIPTION OF CHANGE:

The proposed action is to correct/update U1C12 and U2C10 Pump Seizure Analysis results based on Siemens Power Corp (SPC) reanalyses.

SUMMARY:

- I. No. The pump seizure event is the only accident affected by the proposed action. Correction of the error and implementation of revised Minimum Critical Power Ratio (MCPR) operating limits does not increase the probability of occurrence of an accident or malfunction of equipment important to safety. In addition, implementation of appropriate MCPR operating limits will assure that the radiological dose consequences of the pump seizure accident remain well within the criteria established by the NRC (i.e., less than 10% of 10CFR100 limits). Therefore, the proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.
- II. No. Correction of the SPC pump seizure error and implementation of revised MCPR operating limits do not: 1) create any new or different initiating events, failures, or failure modes, which have not been previously considered or evaluated, 2) create the possibility of a previously unevaluated operator error or a new single failure, or 3) make any accidents or malfunctions previously considered incredible anymore credible.

The proposed action does not directly or indirectly affect any plant system, equipment, or component (other than the expected response of the reactor core to a pump seizure accident). Implementation of revised single loop MCPR operating limits for each unit will assure that the applicable acceptance criteria are met for U1C12 and U2C10.

Therefore, these changes do not create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.

- III. No. Applicable sections of the Technical Specifications are 3.4.1 and 5.6.5. Section 3.4.1 contains LCOs applicable to single loop operation and section 5.6.5 contains references which directly support generation of core operating limits.

The required margin of safety is to assure that appropriate operating limits are set such that a pump seizure event will result in radiological dose to the public equivalent to less than 10% of 10CFR100 limits. Correction of the SPC pump seizure error and implementation of revised MCPR operating limits will provide this required margin of safety. In fact, the predicted radiological release to the public is well within the required dose limits (approximately 50% margin exists to the NRC criteria).

Therefore, this proposed change does not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-300

CROSS REFERENCE: DCP 288543, Unit 2

DESCRIPTION OF CHANGE:

This modification removes piping components (e.g., flanges, fittings, etc.) from small pipe (e.g., 1" piping) associated with the 2A reactor recirculation pump to reduce the potential for pipe cracks due to high vibration.

SUMMARY:

- I. No. Based upon a review of the SAR (including FSAR Sections 3.9, 12.2, 15 & ODCM), the initiating event which includes the components affected by this modification is the recirculation pump shaft break and a small break LOCA. The probability of these events occurring is not increased because these modifications do not change the interface between the recirculation motor and the shaft and also the failure probability of the affected piping is decreased because the supports added and welds eliminated reduce the probability of pipe cracking due to vibration, while not increasing the probability of pipe cracking due to other failure mechanisms. The affected components interface with the drywell and the recirculation pumps, which perform safety-related functions. The probability of a malfunction of this equipment is not increased because their interface is not affected and there is no change in the fluid properties within the piping which would result in an increase in the rate of drywell leakage. There are no new radiological pathways created and no radiological increase from existing pathways caused by this modification as a result of a accident or a malfunction of equipment.
- II. No. The possible failure modes of the modified piping were evaluated for new impacts upon plant equipment and previously evaluated initiating events (evaluated in the SAR). No new impacts were identified. The modified system configuration conforms to the applicable construction Codes and Standards. The interfaces with equipment important to safety are unaffected by this modification since no new impacts were identified. Therefore, this modification will not result in an accident or malfunction of a different type being created for equipment important to safety.
- III. No. Based upon a review of the design parameters involved with this modification, none which serve as the basis for a margin of safety, as presented in the SSES Technical Specifications, are adversely affected by the modifications. Therefore, this modification does not reduce any margin of safety which serves as the basis for any Technical Specification or Technical Requirement.

SER NO: 01-301

CROSS REFERENCE: NL-00-040, Unit 1 and Unit 2

DESCRIPTION OF CHANGE:

This evaluation addresses increasing the Siemens Power Corp, (SPC) 9X9-2 maximum assembly exposure from 45,000 megawatt days/metric ton uranium (MWD/MTU) to 46,000 MWD/MTU for both Units 1 and 2.

SUMMARY:

- I. No. A review of the mechanical design criteria show that all criteria are met for increasing the SPC 9X9-2 exposure to 46,000 MWD/MTU.

The Minimum Critical Power Ratio (MCPR) Operating Limit will not be affected by increasing the fuel assembly exposure because the core average exposure is assumed to remain the same and the high exposed assemblies are not the MCPR limiting assemblies due to their lower power. Increasing the fuel assembly exposure will not affect the MCPR Safety Limit because the highly exposed SPC 9x9-2 fuel assemblies do not contribute to the number of fuel pins in boiling transition, due to their lower power. Thus, the MCPR Safety Limit will not be violated. In addition, the transient Linear Heat Generation Rate (LHGR) limit will not be violated. Therefore, there is no increase in either the probability or consequences of exceeding the MCPR Safety Limit or transient LHGR limit as a result of increasing the SPC 9x9-2 maximum fuel assembly exposure.

The results of all the evaluations demonstrate that all applicable criteria are still met for increasing the maximum assembly exposure from 45,000 MWD/MTU to 46,000 MWD/MTU. The increase in the exposure will not affect the failure mode of any system or component, nor will it affect the probability of occurrence of any transient or accident-initiating event. Therefore, the proposed action does not result in an increase in the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.

- II. No. Increasing the SPC 9X9-2 maximum fuel assembly exposure from 45,000 MWD/MTU to 46,000 MWD/MTU does not: 1) create any new or different initiating events, failures, or failure modes, which have not been previously considered or evaluated, 2) create the possibility of a previously unevaluated operator error or a new single failure, or 3) make any accidents or malfunctions previously considered incredible any more credible.

Increasing the SPC 9X9-2 maximum fuel assembly exposure does not directly or indirectly affect any plant system, equipment, or component (other than the core itself, and therefore does not affect the failure modes of any of these.

Therefore, these changes do not create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.

- III. No. The result of increasing the maximum assembly exposure does not change or modify the operating limits or degrade the function or operation of any plant system or component governed by Technical Specifications. The current COLR operating limits for the SPC 9x9-2 assemblies will remain valid.

All transients, accidents, and reactivity related assessments have been evaluated for increasing the SPC 9X9-2 maximum fuel assembly exposure from 45,000 MWD/MTU to 46,000 MWD/MTU to assure that applicable acceptance criteria are met.

Analyses and evaluations addressed the impact of the increased maximum assembly exposure on decay heat, the radioactive source terms, Heavy Loads (movement of heavy loads over irradiated fuel), Post-LOCA hydrogen generation (hydrogen recombiners), Equipment Qualification (In-Containment Emergency Equipment), LOCA electrical time lines (electrical supply), Suppression Pool Heat Load, Spray Pond Analysis, Spent Fuel Pool Boiloff Analysis, Public and Occupational Dose, ATWS, Recirculation Pump Performance, LOCA offsite dose, the Emergency Plan, and the EOPs. The results of these evaluations demonstrated that the applicable acceptance criteria for these evaluations are met for increasing the maximum assembly exposure from 45,000 MWD/MTU to 46,000 MWD/MTU.

Therefore, this change does not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-302

CROSS REFERENCE: DCPs 277621, 277623, 277671, 277673, 277675 and 277676, Unit 1 and Unit 2

DESCRIPTION OF CHANGE:

This change revises the Residual Heat Removal Service Water (RHRSW) System Radiation Monitors to:

1. provide an automatic start of a radiation monitor pump and increase the trip time delay to assure continuous monitoring whenever the corresponding RHRSW Loop is operating,
2. remove unnecessary tube/pipe fittings to reduce restrictions in the sample lines to the 'B' Loop Radiation Monitors and thus improve flow when the pumps are running, and
3. install sampling provisions at the Spray Pond valve vault to permit sampling of the common RHRSW and Emergency Service Water (ESW) return line before it is discharged into the spray pond, in the event that a radiation monitor is not available and local (at the radiation monitor) sampling is not possible.

SUMMARY:

- I. No. The RHRSW Radiation Monitors are used to detect intersystem leakage between the RHR System (primary coolant) and the RHRSW System. Leakage monitoring is required in order to identify and monitor leak paths. The monitors are not relied upon to maintain releases less than 10CFR100 limits (this is the function of the RHR Heat Exchangers) or to mitigate such releases.

These modifications automate the operation of the radiation monitors and provide an alternate location for sampling, when a radiation monitor is not available. Therefore, these modifications do not increase the probability of occurrence or the consequences of an accident previously evaluated.

- II. No. The RHRSW System does not operate during normal power generation, except as required for suppression pool and spray pond cooling. It is used to provide cooling for normal shutdown and emergencies. The RHR Heat Exchangers are included in the heat exchanger inspection program and internal corrosion is monitored through non-destructive examinations to detect potential failures.

These modifications do not create any new release paths or change the operation of the RHRSW System. The modifications reduce the need for manual operator action and provide alternate locations for sampling if the Reactor Building is inaccessible. Therefore, the possibility of an accident or malfunction of a different type is not created.

- III. No. The RHRSW Radiation Monitors are radioactive process monitors that are required to be operable to satisfy TRO 3.11.1.5. From the TRM basis (TRM 3.11.1.5), the RHRSW Radiation Monitor is required to monitor and control, as applicable, the releases of radioactive effluents during actual or potential releases of liquid effluents. Grab samples are required when the radiation monitor is unavailable since the RHRSW has the potential to become radioactive.

These TRM requirements are not changed by this modification; rather, an alternate method of obtaining this sample is being provided. Therefore, there is no reduction in the margin of safety defined in Technical Requirements Manual.

SER NO: 01-303

CROSS REFERENCE: DCP 220416, Units 1 and 2

DESCRIPTION OF CHANGE:

The proposed action is to replace the failed McGraw-Edison Unit Auxiliary Transformer (1 or 2XI05) with a spare Pauwels transformer.

SUMMARY:

- I. No. The proposed actions do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR since the new transformer is functionally equivalent to the one replaced, and no system interfaces are adversely affected. Chapters 6 and 15 of the FSAR, the Design Assessment Report, the Current Reload Analysis, NUREG-0776 and the FPRR were reviewed.
- II. No. No system interfaces are adversely affected nor new ones created. The replacement transformer is functionally equivalent to the one being replaced. The design is performed in accordance with applicable codes and standards. Thus, there were no new scenarios that could be postulated that would create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR. Chapter 6 and 15 of the FSAR, the Design Assessment Report, the Current Reload Analysis, NUREG-0776 and the FPRR were reviewed.
- III. No. The proposed action does not affect the operability requirements of any safety related system component as governed by Technical Specification or Technical Requirements Manual. The Auxiliary Transformers and their fire protection are not governed by Technical Specifications and are not directly interlocked with any other Technical Specification related system or component to initiate an action. The margin of safety as defined in the basis of the Technical Specification or Technical Requirements Manual is not reduced by the proposed action.

SER NO: 01-304

CROSS REFERENCE: DCPs 285502, 285506, 285508, 285509, 285510 and 285511, Unit 1 and Unit 2

DESCRIPTION OF CHANGE:

These changes will replace existing temperature, pressure, flow, voltage and frequency control room recorders with Yokogawa digital programmable type recorders. The recorders being replaced are XR10172, PR10101C, PR10756, TR10187, TRI1931, FR11503, TR11501 and TR11918 located in 1C668; and the corresponding Unit 2 recorders located in 2C668.

SUMMARY:

- I. No. The proposed modifications do not affect any of the postulated initiating events for which transients or anticipated operational occurrences and accident conditions were analyzed (Ref. FSAR Chapter 6, and Chapter 15, FPRR, Design Assessment Report, Current Reload Analysis (DBD046) and NUREG-0776). It does not create a condition that could propagate an accident. The proposed change does not involve a precursor of, or contribute to, any evaluated accidents involving offsite dose. These changes do not adversely affect any safety-related plant systems or components. These changes have no adverse effect on accident scenarios and do not increase the potential of a malfunction of equipment important to safety. These modifications will not increase challenges to safety systems assumed to function for any accident analysis. Therefore, these changes have no effect on any accident scenario or malfunction of equipment important to safety, and have no effect on radiological consequences.

The proposed change will allow operators to continue to monitor and record all of the existing variables directly on the replacement recorders. In addition, the replacement recorders will continue to be powered from the same 120 VAC Instrument Distribution Panels that serve as the power source for the existing recorders. Therefore, the proposed modifications do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR.

- II. No. This modification involves replacing old and obsolete temperature, pressure, flow, voltage and frequency recorders with new and more reliable recorders. This does not introduce the possibility of new failure initiators. The existing AC Instrument Power Distribution Panels will be used. The functionality of data display will not change. Therefore, the review concluded that the modification would not create the possibility for an accident of a different type.

The proposed modifications do not adversely impact the dynamic qualification of Panels 1C668 and 2C668 and do not adversely affect the power sources. A failure of the new recorders produces the same results as failure of the existing recorders. Therefore, the proposed change does not create the possibility of an accident or malfunction of a different type than any evaluated previously.

- III. No. Technical Specification sections 3.7 (Plant Systems) and 3.8 (Electrical Power System) and their bases and Technical Requirements Manual were reviewed. The measured parameters involve the Main Steam system, main turbine generator, Circulating Water system and Reactor Feed Pump Turbine which are not addressed by the Technical Specifications. The data provided by Cooling Tower Blowdown Flow Recorders FR-11503 and FR-21503 are included as Liquid Radwaste Effluent Monitoring Instrumentation in support of Technical Requirement 3.11.1.4 for monitoring liquid radwaste release. The proposed recorder replacement modifications have no impact on the Technical Specifications, since no circuit or equipment modifications degrade the respective instrumentation channels. Therefore, the proposed changes do not affect the margin of safety as delineated in the Technical Specifications or Technical Requirements.

SER NO: 01-305

CROSS REFERENCE: DCP 99-012, Unit 2

DESCRIPTION OF CHANGE:

This modification adds a new pipe support on the 'A' reactor recirculation pump seal water pipe (SPDCB211-1) run to reduce the potential for pipe cracks due to high vibration and replaces 1" manual valve 243FO14A with one better suited for maintenance.

SUMMARY:

- I. No. Based upon a review of the SAR (including FSAR Section 3.9, 12.2, 15 & ODCM), the initiating event which includes the components affected by this modification is the recirculation pump shaft break and the probability of this event occurring is not increased because this modification does not change the interface between the recirculation motor stand and the shaft. The failure probability of the affected piping is decreased because the support added reduces the probability of pipe cracking due to vibration, while not increasing the probability of pipe cracking due to other failure mechanisms. The support capability of the motor stand to which the new pipe support is mounted is not degraded as a result of this modification based upon location of the bolts and evaluation by the vendor. The affected components interface with the drywell and the recirculation pumps, which perform safety-related functions. The probability of a malfunction of this equipment is not increased because their interface is not affected and there is no change in the fluid properties within the piping which would result in an increase in the rate of drywell leakage. There are no new radiological pathways created and no radiological increase from existing pathways caused by this modification, as a result of an accident or a malfunction of equipment.
- II. No. The possible failure modes of the modified piping and motor stand were evaluated for new impacts upon plant equipment and previously evaluated initiating events (evaluated in the SAR). No new impacts were identified. The modified system configuration conforms to the original construction codes and standards. The interfaces with equipment important to safety are unaffected by this modification since no new impacts were identified. Therefore, this modification will not result in an accident or malfunction of a different type being created for equipment important to safety.
- III. No. Based upon a review of the design parameters involved with this modification, none which serve as the basis for a margin of safety as presented in the SSES Technical Specifications, are adversely affected by the modifications. Therefore, this modification does not reduce any margin of safety which serves as the basis for any Technical Specification.

SER NO: 01-306

CROSS REFERENCE: NL-01-002, Unit 2

DESCRIPTION OF CHANGE:

The proposed action is to accept (i.e., use as-is) the fuel assemblies fabricated by SPC for Unit 2 Cycle 11 (U2C11).

This evaluation is being written to address an inconsistency between the Sandvik Special Metals (SSM) and Siemens Power Corporation (SPC) Ultrasonic Test (UT) inspection results for the U2C11 fuel rod tubing (cladding) supply. The inconsistency between SSM and SPC UT results is that the SPC UT overcheck process identified an atypical number of reject tubes, i.e., tubes that had flaw indications that exceed the UT signal response threshold.

SUMMARY:

- I. No. The potential for the existence of minuscule defects in the fuel rod cladding causing a fuel rod to leak fission products is recognized in FSAR Section 11.1.1. Although some of the fuel rods contained in the Unit 2 Cycle 11 fuel supply may contain cladding flaws up to 6 mils in depth, analyses have shown that fuel rod failures are not expected to occur as a result of these flaws either during normal operations, transient, or accident conditions, i.e., the fuel still meets all the applicable design criteria. In the unlikely event that a fuel rod has a flaw with a depth greater than 6 mils, there would be an increased chance of fuel failure; however, such a failure would result in coolant activity levels well within Technical Specifications, and would remain bounded by the radiological consequences as evaluated in the FSAR.

In addition, the existence of the fuel cladding flaws does not change or add any new transient or accident initiators, and does not affect any other plant component. Therefore, the presence of the subject cladding flaws will not increase the probability or consequences of an accident or malfunction of equipment as previously analyzed in the FSAR. FSAR Chapters 1, 4, 5, 6, 7, 11, and 15 were reviewed as part of this evaluation.

- II. No. The presence of fuel rod cladding flaws does not directly or indirectly affect any plant system, equipment, or component (other than the fuel rod), and therefore, does not affect the failure modes of any of these. The change does not affect initiators for anticipated operational occurrences or postulated accidents or create a new initiator. Therefore, the existence of a cladding flaw will not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR. FSAR Chapters 1,4,5,6,7,11 and 15 were reviewed to reach this conclusion.
- III. No. TS Sections 2.1, 3.2, 3.4. 1, and 5.6.5 pertain to fuel safety limits and/or associated core operating limits. The associated core operating limits include the Minimum Critical Power Ratio (MCPR), Average Planar Linear Heat Generation Rate (APLHGR), and Linear Heat Generation Rate (LHGR) parameters. The presence of fuel rod cladding flaws does not affect these core operating limits as these fuel rods still meet all mechanical design criteria, and therefore the margin of safety as defined in the Technical Specifications Bases is not reduced.

SER NO: 01-307

CROSS REFERENCE: DCP 97-9121, Rev. 1, Unit 2

DESCRIPTION OF CHANGE:

This modification will abandon the regulator boards and perform internal wiring changes for the Vital Uninterruptible Power Source (UPS) panel 2D666.

SUMMARY:

- I. No. Based upon a review of FSAR Chapters 7.7, 8.3.1.8 & 15, there are no initiating events which include the components affected by this modification. This modification will perform internal wiring changes for the Vital UPS panel 2D666. No adverse system logic changes occur. As a result, the probability of an accident previously analyzed in the FSAR is not increased. This modification does not adversely affect any safety-related system, nor does it change the design basis of any system or structure. All changes performed under this modification are designed and installed in accordance with applicable Codes and Standards to ensure their design and construction integrity. In addition, no system interfaces are adversely affected nor any new ones created. Therefore, this modification will not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR. There are no new radiological pathways created and no radiological increase from existing pathways caused by this modification as a result of an accident or a malfunction of equipment.
- II. No. The possible failure modes of the modified Vital UPS panel 2D666 were evaluated for new impacts upon plant equipment and previously evaluated initiating events (evaluated in the FSAR). No new impacts were identified. The modified system configuration conforms to the applicable construction Codes and Standards. The interfaces with equipment important to safety are unaffected by this modification since no new impacts were identified. Therefore, this modification will not result in an accident or malfunction of a different type being created for equipment important to safety.
- III. No. Based upon a review of the design parameters involved with this modification, none, which serve as the basis for a margin of safety, as presented in the SSES Technical Specifications, are adversely affected by the modifications. Therefore, this modification does not reduce any margin of safety which serves as the basis for any Technical Specification or Technical Requirement.

SER NO: 01-308

CROSS REFERENCE: NL-00-021, Rev 1, Unit 1

DESCRIPTION OF CHANGE:

This evaluation addresses the repair plan for the internals (missing tube supports, unsupported U-bend tubes, dislodged tie rods, eroded U-bend tubes and shell erosion) to assure that there are no adverse impacts on nuclear safety.

SUMMARY:

- I. No. The probability of a decrease in reactor coolant temperature is not increased. The operation with the additional tubes plugged in feedwater heaters 1E103A-C will not significantly change the temperature of the feedwater supplied to the reactor pressure vessel. Therefore, there are no systems or components that are affected by the proposed action. No new failure modes are introduced by the proposed action to operate with the repaired feedwater heaters. Consequences of loss of feedwater heating events are described in FSAR Section 15.1.1 and will not be increased by the proposed action. In addition, the proposed action does not change any system operational or protective logic. The feedwater heaters themselves do not have safety functions. Therefore, the proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.
- II. No. No new failure modes will be introduced by the proposed action to operate with the repaired feedwater heaters. There are no operational parameters that are significantly changed by the proposed action. No physical or structural changes that create the possibility of a new event will be created.

System operational logic will not be changed as a result of the proposed action. In addition, reactor recirculation pump speed limiters that actuate on feedwater heater high-high level signals as described in FSAR Section 7.7.1.3 will not be affected by the proposed action. System logic that protects the main turbine from water induction from the feedwater heaters as described in FSAR Section 7.7.1.3 will not be affected by the proposed action.

Therefore, the proposed action does not create the possibility for an accident or malfunction of a different type than any previously analyzed in the FSAR.

- III. No. Technical Specification 3.3.2.2, "Feedwater-Main Turbine High Water Level Trip Instrumentation" is the only technical specification associated with the feedwater system. This technical specification addresses the functionality required to respond to failures of the feedwater level control system that result in excessive feedwater flow. The proposed action does not reduce the margin of safety for this technical specification nor does it reduce the margin of safety for any other technical specification.

SER NO: 01-309

CROSS REFERENCE: NL-00-038, Unit 2

DESCRIPTION OF CHANGE:

The purpose of this change is to provide instructions to perform a chemical decontamination of the Unit 2 Reactor Recirculation System to reduce the general radiation fields within the drywell.

SUMMARY:

- I. No. FSAR Chapter 15 was reviewed for Accident Analysis and Safety Evaluations that may be impacted by alteration or degradation of the systems and components. The chemical decontamination process requires the plant to be in Mode 5 with the cavity flooded. Based on these prerequisites, it was concluded the chemical decontamination process does not increase the probability or the consequences as previously evaluated.
- II. No. The performance of the chemical decontamination of the Reactor Recirculation piping and components does not create a different type of accident or malfunction than previously evaluated in the FSAR. The proposed decontamination process conditions (solvent concentrations, application temperatures and exposure times) are consistent with qualification testing and industry applications as documented in the above reports. All pressure boundary materials were determined to be compatible based on either published literature, an assessment that the material would behave similarly to a tested material, or an assessment that the potential degradation would not affect component integrity or function. Administrative controls with laboratory confirmations will be implemented to ensure the solvent mixtures are formulated per this specified process. These steps are implemented to avoid any human performance errors. To provide further assurance that the process was maintained within the stated parameters and that previous studies are accurate, a corrosion monitor system will be used during the process. The monitor system consists of coupon holders that will be loaded with representative samples of materials contained in the Reactor Recirculation System and Reactor Vessel. A post process analysis of the coupons will be performed and documented in the vendor's Decontamination Report. No adverse impacts on fuel corrosion are expected from transient exposure to diluted decontamination solvents. To prevent the solvents from entering other systems or components that are not intended to be decontaminated, dual valve isolations will be used where possible. After all the solvent injections are completed, as part of the final flush process, the volume between the valves will be flushed to remove any solvent that may have migrated past the first boundary valve.
- III. No. This chemical decontamination process requires the Reactor Recirculation Outlet and Jet Pump Nozzle Plugs to be installed. The installation has been analyzed which has been verified as applicable to SSES-2. Therefore, Technical Specifications Bases are not affected by the chemical decontamination process.

SER NO: 01-310

CROSS REFERENCE: DCP 288719, Unit 2

DESCRIPTION OF CHANGE:

This change replaces all the cells of battery 2D640 from the present combination of KC-19 and KCR-21 cells to all KCR-21 cells, installs concrete anchors in floor of battery room C-616 in order to use the Battery Lifting Hoist, tool number 2.1.1. and raises light fixtures in room to prevent interference with hoist when lifting battery cells.

SUMMARY:

- I. No. The replacement of 2D640 with new KCR-21 cells does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR. Original design of the 125 VDC Class 1E Battery System consisted of 60 C&D type KC-19 cells per channel (A, B, C & D). The Unit 2 125 VDC batteries were upgraded to type KCR-21 cells, due to the addition of Station Blackout Inverter loads. As a result of failing the 60 month discharge performance test, 2D640 was replaced, using a combination of KC-19 and KCR-21 cells. This change will restore battery 2D640 to the 825 Ampere hour rating, from a low rating of 742 Ampere hours, using KC-19 cells.
- II. No. FSAR Sections 8.3.2 and 9.4.1 were reviewed. There are no new types of accidents which can occur as a result of replacing 60 battery cells with the same type which had been installed since 1989. The battery lifting structure/hoist and rigging are designed to NUREG 0612 critical heavy load lift requirements, even though the type KCR-21 cells are not heavy loads. This design assures that there are no new failure modes. Therefore, the failure mode and effect analysis in FSAR table 8.3-21 bounds the replacement of Battery 2D3640.
- III. No. Electrical Power Systems - Sections 3.8.4, 3.8.5, 3.8.6, 3.8.7 and 3.8.8 of the Unit 2 Technical Specification Bases documents the operational and surveillance requirements for the DC system. Battery 2D640 is being restored to the upgraded capacity of 1989 (825 Amp hours). Therefore the proposed action does not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-311

CROSS REFERENCE: DCPs 237306, 237308, 237309, Unit N/A

DESCRIPTION OF CHANGE:

These changes expand the Independent Spent Fuel Storage Installation (ISFSI) by adding 14 new horizontal storage modules (HSM) and adding expanded lightning protection and temperature monitoring to the newly added HSMs.

SUMMARY:

- I. No. The proposed modifications do not increase the probability of an accident or malfunction of equipment important to safety as previously evaluated In the FSAR. Chapter 9 and 15 of the FSAR have been reviewed against the effects of the proposed change to substantiate this conclusion. The expansion of the ISFSI is independent of all plant safety systems and has been determined to have no adverse effects on the safe operation of the SSES.
- II. No. The expansion of the ISFSI was assessed and It was determined to have no adverse effect on Units 1 and 2. The ISFSI does not Interface with safety related systems. In addition, based on the reviews performed for the effects of the ISFSI on SSES it was concluded that no possibility exists for an accident or malfunction of a different type than any evaluated previously in the FSAR.

Accidents that could occur within the ISFSI itself have been evaluated In the Transnuclear West safety analysis report and were accepted by the NRC in the NRC SER/C of C and are outside the scope of this evaluation.

- III. No. Technical Requirements Section 3.10.3, Independent Spent Fuel Storage Installation (ISFSI), discusses the Actions/Surveillances required for HSMs that are loaded with spent fuel. Technical Specification Section 4.0, Design Features, discusses Spent Fuel Storage Pool capacity limits. These Technical Specifications and Technical Requirements apply to the spent fuel transfer and handling process and do not apply to the expansion of the ISFSI, therefore, the margins of safety defined in their bases are not reduced.

SER NO: 01-312

CROSS REFERENCE: T-Mods 310437, 310440, 310441, 310442 and 310444, Unit 1 and Unit 2

DESCRIPTION OF CHANGE:

This change provides temporary wireless telephone service to Reactor Building elevation 818', E Diesel Generator Building, A through D Diesel Generator Bays, Unit 2 Reactor Building elevations 749' and 719', Unit 2 Drywell, Unit 2 Turbine Building elevation 729', and Unit 2 Control Structure elevations 754' and 699'. This service will be provided by expanding the CoralAIR low power wireless Unlicensed-band Personal Communications Service (U-PCS).

SUMMARY:

- I. No. Expansion of the U-PCS to support the U2-10RIO will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR. The system will not affect the proper functioning of either safety or non-safety systems, or adversely affect either Security Plan or Emergency Plan communications equipment
- II. No. Installation and use of the expanded wireless telephone system will not create a new initiator or failure not considered in the FSAR. Testing will demonstrate that the system has no effect on any electronic controllers, indicators or recorders in safety and non-safety systems in the U-PCS coverage area.
- III. No. Installation and use of the expanded wireless telephone system does not reduce the margin of safety as defined in the basis for any Technical Specification. Use of the telephone system is not contained in any Technical Specification Basis or Technical Specification. The proposed system meets or exceeds all acceptability criteria of NUREG-0800 section 9.5.2 on Communications Systems.

SER NO: 01-313

CROSS REFERENCE: DCP 247307, Units 1 and 2

DESCRIPTION OF CHANGE:

This change replaces the Power Generation Control Complex (PGCC) Floor Panels.

SUMMARY:

- I. No. The proposed actions do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR. There are no impacts on equipment important to safety. The function of the PGCC floor system affected by the proposed action does not change. Appendix R safe shutdown can be achieved and maintained for postulated fires in any plant area. Chapters 6 and 15 of the FSAR, the Design Assessment Report, the current Core Operating Limits Report and the FPRR were reviewed.
- II. No. The proposed action did not identify a postulated initiating event which would create the possibility of an accident of a different type. There were no new scenarios that could be postulated that would create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR. . Chapters 6 and 15 of the FSAR, the Design Assessment Report, the current Core Operating Limits Report and the FPRR were reviewed.
- III. No. The proposed action does not affect the operability requirements of any safety related system component as governed by Technical Specification or Technical Requirements Manual. The margin of safety defined in the basis of the Technical Specification or Technical Requirements Manual is not reduced by the proposed action. TRM Section 3.7.3.3 and 3.7.3.4 were reviewed.

SER NO: 01-314

CROSS REFERENCE: DCP 179069, Unit 2

DESCRIPTION OF CHANGE: This generic modification will install metal oxide varistors (MOV) as EMI (noise) suppression devices across the relay coils for GE type HFA relays in addition to Agastat 7000 relays B21H-K4A, K4B, K4C, & K4D.

In addition, this generic modification will install ferrite beads around suspected EMI coupling points for the Source Range Monitors/Intermediate Range Monitors (SRM/IRM) detector channel(s) on an as-needed basis.

SUMMARY:

- I. No. The installation of the ferrite beads on SRM/IRM detector channel(s), and MOVs in panels 2CB09 and 2C611 will be in accordance with electrical separation criteria and will not create a safety impact item. The ferrite beads are passive devices and will not cause a failure of the SRM or IRM cable it is installed on or cause another channel to become inoperable. The MOVs are designed to be installed at the relay base and do not require additional support. Since the MOVs will be installed in the existing Class IE circuitry, they will have a Class IE classification. The installation of these items maintains the commitments to mitigate accidents while maintaining the health and safety of the public, and does not increase the probability of occurrence of an accident.
- II. No. The installation of ferrite beads on the SRM and IRM cables will be in accordance with approved installation details. The beads are passive and will not interfere with the operation of these systems. System operation will not be affected. There will be no logic changes associated with this generic modification. The addition of the MOVs to the HFA and Agastat E7000 relays in panels 2C609 and 2C611 will not impact the operation of the relays. The voltage transients associated with de-energizing the relays will be removed. The end result of this generic modification is to remove unwanted EMI or noise from the systems containing these components. This action will not create a possibility for an accident or malfunction of a different type than evaluated previously in the FSAR.
- III. No. SRMs are discussed in the Technical Requirements Manual Section 3.1.3 and are contained in the Tech. Spec. Bases Surveillance Requirements SR 3.3.1.1.6 and 3.3.1.1.7. The installation of the ferrite beads will not impact SRM system operation. This installation will only remove unwanted EMI from the signal and not affect the signal. Tech. Spec. Bases were reviewed, and Tech. Spec. Bases B 3.3.1.1 discusses the Reactor Protection System (RPS) and associated trips caused by the HFA and Agastat E7000 relays in panels 2C609 and 2C611. The addition of the MOVs to the HFA and Agastat E7000 relays in panels 2C809 and 2C611 will not impact the operation of the relays. The voltage transients associated with de-energizing the relays will be removed. Since the system operation will not be changed the margin of safety will not be reduced. Tech. Spec. Base B 3.3.1.1.1.a discuss the IRMs and their functions. The installation of the ferrite beads will not impact IRM system operation. Since the RPS and IRMs will be able to perform the Safety functions as assumed in the safety analysis, the margin of safety, as defined in Tech Spec Bases, is not reduced.

SER NO: 01-315

CROSS REFERENCE: DCPs 99-3051, 99-3052, 99-3053, 99-3054, 99-3056 and 99-3057, Rev. 1, Units 1 and 2

DESCRIPTION OF CHANGE:

These changes replace existing control room temperature, flow vibration and eccentricity recorders with Yokogawa digital programmable type recorders. Recorders being replaced are TRE411R605, TRSE111R601, FREI11R608, TR11966, XR12728, TRE412R605, TRSE112R601, FRE112R608, TR21966 and XR22728 located in 1C601, 1C668, 2C601 and 2C668.

SUMMARY:

- I. No. The proposed modifications do not affect any of the postulated initiating events for which transients or anticipated operational occurrences and accident conditions were analyzed (Ref. FSAR Chapter 6, and Chapter 15, FPRR, Design Assessment Report, Current Reload Analysis and NUREG-0776. It does not create a condition that could propagate an accident. The proposed change does not involve a precursor of, or contribute to, any evaluated accidents involving offsite dose. These changes do not adversely affect any safety-related plant systems or components. These changes have no adverse effect on accident scenarios and do not increase the potential of a malfunction of equipment important to safety. These modifications will not increase challenges to safety systems assumed to function for any accident analysis.

The proposed change will allow operators to continue to monitor and record all of the existing variables directly on the replacement recorders. In addition, the replacement recorders will continue to be powered from the existing 120, VAC Instrument Distribution panels. Therefore, the proposed modifications do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR.

- II. No. These modifications involve replacing old and obsolete temperature, flow, vibration and eccentricity recorders with new and more reliable recorders and this does not introduce the possibility of new failure initiators. The existing AC Instrument power supplies will be used. Electrical separation will be in accordance with PP&L specification and FSAR Chapters 8.3.1.11.4. The functionality of data display and alarm circuits will not change. Therefore, the modifications will not create the possibility for an accident of a different type.

The proposed modifications do not adversely impact the dynamic qualification of the existing panels and do not adversely affect their power sources. A failure of the new recorders produces the same results as failure of the existing recorders. Therefore, the proposed change does not create the possibility of an accident or malfunction of a different type than any evaluated previously in the FSAR.

- III. No. Tech Specification sections 3.6 and 3.5 and their bases and Technical Requirements Manual were reviewed to make this determination. The proposed action of replacing Control Room recorders will provide the operator with more reliable temperature and flow information. The proposed modifications have no impact on the Technical Specifications, since no circuit or equipment modifications degrade the associated instrumentation channels. Therefore, the proposed changes do not affect the margin of safety as delineated in the Technical Specifications or Technical Requirements.

SER NO: 01-316

CROSS REFERENCE: NL-00-035, Unit 1 and 2

DESCRIPTION OF CHANGE:

The proposed revision to the TS bases and TRM will change the control structure pressure boundary to the habitability boundary as defined in FSAR Section 6.4. Also, the proposed revision will clarify Control Room Emergency Outside Air System (CREOAS) operability and the necessary equipment for Control Structure and Computer Room HVAC, Control Structure Chilled Water and Battery Room Exhaust system operability. Additionally, the proposed revision will relax the allowed outage time for the Standby Gas Treatment (SGT) Equipment Room ventilation system (cooling) and provide a justification for the outage times presented in TRM Section 3.7.9.

SUMMARY:

- I. No. The proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety. Occupancy of the habitability envelope after an accident is discussed in FSAR Sections 6.4, 6.5 and 15.6. The proposed change assures that the systems necessary to maintain occupancy of the habitability envelope will be available and perform the function as described in the FSAR. The change of the required completion time for the SGT Equipment Room Ventilation System (Cooling) is consistent with the allowed completion times for other safety related cooling systems (Control Room Floor Cooling) and with the FSAR discussions in Section 6.5 and 9.4. Since the systems will be operated in accordance with the FSAR, no increase in the consequences of an accident or malfunction of equipment will occur. Since there is no physical change to the systems and the systems are operated within their design basis as discussed in the FSAR there is no increase in the probability of an accident or malfunction of equipment
- II. No. The proposed action does not create a possibility for an accident of a different type than any evaluated in the FSAR. The proposed change assures that the Control Structure HVAC systems will be operated within the descriptions presented in FSAR Section 9.4. The change of completion time for the SGT Equipment Room Ventilation System (Cooling) is consistent with the allowed completion times for other safety related cooling systems (Control Room Floor Cooling). The habitability envelope will be maintained in accordance with FSAR Sections 6.4, 6.5 and 15.6. Since the systems will be maintained within their design configurations as described in the FSAR, there is no possibility for an accident or malfunction of a different type.
- III. No. The proposed change does not reduce the margin of safety as defined in the basis for any Technical Specification. The proposed change does revise the bases for TS Sections 3.7.3 and 3.7.4 and also Section 3.7.9 of the Technical Requirements Manual (TRM). The proposed change to these sections will provide additional assurance that the systems will be available to perform their design functions as analyzed in the FSAR. Based on the above information, it was determined that the proposed change will not reduce the margin of safety as defined in the basis of any Technical Specification.

SER NO: 01-317

CROSS REFERENCE: NL-00-007, Unit 1 and 2

DESCRIPTION OF CHANGE:

This change revises Section 8.4 of NDAP-QA-0412 'Leakage Rate Test Program' to allow 10CFR50 Appendix J Type C testing of the isolation valves for H₂O₂ panels that connect to primary containment atmosphere. The revised section will allow tested isolation valves to be the containment boundary when the valves are closed. The revised section also allows reverse testing of designated isolation valves to obtain the leak rate for the valve.

SUMMARY:

- I. No. Leak rate testing of the isolation valves is associated with limiting the consequences of an accident previously evaluated in the SAR. Leak rate testing of the isolation valves ensures primary containment integrity following an accident. This leak rate testing does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in FSAR Chapters 6 and 15.

Leak rate testing the isolation valves does not increase the consequences of an accident previously evaluated in Chapter 15 of the FSAR. Specifically, FSAR Section 15.6.5, "Loss-of-Coolant Accidents (Resulting from Spectrum of Postulated Piping Breaks within the Reactor Coolant Pressure Boundary) - inside Containment" includes assumptions for primary containment leakage which bound the limits specified in the Leakage Rate Test Program (NDAP-QA-0412). Since the isolation valves will be tested and maintained as Type C tested components in accordance with the Leakage Rate Test Program, leakage from the containment will be less than the value assumed in FSAR section 15.6.5 and there is no increase in the consequences of an accident previously evaluated in the SAR.

- II. No. Leak rate testing of the isolation valves is associated with the integrity of containment following a Design Basis Accident. As such, it does not introduce the possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.

Leak rate testing the isolation valves is associated with how an accident is mitigated or limiting the consequences of an accident previously evaluated in the SAR. Leak rate testing of the isolation valves ensures primary containment integrity following an accident. This leak rate testing does not increase the possibility for an accident of a different type to occur than previously evaluated in FSAR Chapters 6 or 15. Additionally, the leak rate testing of isolation valves affects leakage from primary containment following a Design Bases LOCA, and therefore, is not associated with any conditions evaluated in FSAR Chapter 11. Thus, the proposed action does not create a possibility for an accident of a different type than any evaluated previously in the SAR.

- III. No. Leak rate testing of the isolation valves does not reduce the margin of safety as defined in the Tech Specs. The proposed change would include any leakage through the isolation valves in the Type B and Type C running totals. This ensures that containment leakage remains below the criteria specified in the Tech Specs for all containment configurations when primary containment integrity is required.

SER NO: 01-318

CROSS REFERENCE: DCPs 240056 and 240057, Unit 1 and Unit 2

DESCRIPTION OF CHANGE:

The proposed action modifies the speed control circuitry of the Reactor Recirculation Pump to eliminate the speed fluctuations of 2 to 20 rpm when operating at steady state conditions due to noisy input from the Reactor Recirculation MG set tach generator into the speed controller.

SUMMARY:

- I. No. The proposed action does not affect the spectrum of postulated events for which transients or anticipated operational occurrences and accident conditions were analyzed. FSAR Section 15.3.1- Recirculation Pump Trip, Section 15.3.2 - Recirculation Flow Control Failure-Decreasing Flow, Section 15.4.3 - Control Rod Maloperation (System Malfunction or Operator Error), and Section 15.4.5 - Recirculation Flow Control Failure with Increasing Flow were reviewed. DCPs 240056/240057 do not change minimum/maximum speed limits or rate of change parameters. The logic change involves removing the tach generator speed feedback signal as an input to the error correction circuitry and in its place provides a closed feedback loop that utilizes the speed demand signal as an input. This change is implemented to eliminate the potential for control system oscillations due to degraded tachometer performance.
- II. No. A random single failure of the modified speed control circuitry is bounded by the accident analysis as delineated in FSAR Section 15.3.2 - Recirculation Flow Control Failure with Decreasing Flow and Section 15.4.5 -Recirculation Flow Control Failure with Increasing Flow. No additional accident scenarios can result.

Chapters 6 and 15 of the FSAR, the Fire Protection Review Report (FPRR), the Technical Requirements Manual (TRM), Core Operating Limits Reports (COLR), and the Design Assessment Reports were reviewed. The review did not identify a postulated initiating event that creates the possibility for an accident of a different type. This change does not add new equipment or circuitry or alter operator response to plant transients or accidents. No new failure mechanisms or unanalyzed accidents are created.

- III. No. Technical Specification sections that pertain to the recirculation system and pump are: 1.) Safety Limits - Reactor Core Safety Limits (Section 2.1.1), 2.) Instrumentation- End of Cycle Recirculation Pump Trip (Section 3.3.4.1), 3.) Instrumentation- Anticipated Transient Without Scram Recirculation Pump Trip (Section 3.3.4.2) and 4.) Reactor Coolant System a) Recirculation Loops Operating (Section 3.4.1), b) Jet Pumps (Section 3.4.2), c) Reactor Coolant System Pressure and Temperature Limits (Section 3.4.10)

Additionally, the following sections of the Technical Requirements Manual have been reviewed for impacts and determined to be not affected.

Section 3.3.10 "Reactor Recirculation Pump MG Set Stops"

Section 3.4.4 "Reactor Recirculation Flow and Rod Line Limit"

The purpose of these modifications is to minimize the potential of exceeding the power thermal limit caused by power oscillations and to enhance speed control system stability. The above listed sections and their Bases were reviewed, and it has been determined that applicable flow characteristics, safety limits, safety analysis and bases are not changed. The ability to control a stable core flow is the same prior to the modification as after the modification. Reactor Recirculation System integrity and system safety trip functions are not affected. Therefore, the changes made by DCPs 240056/240057 do not reduce the margin of safety as defined in the Technical Specifications.

SER NO: 01-319

CROSS REFERENCE: NL-01-006, Unit 1 and Unit 2

DESCRIPTION OF CHANGE:

This evaluation reviews the impact on the licensing basis of propping open Unit 1 door 504 (Unit 2 door 505), connecting the Reactor Building Main Steam Tunnel (RBMST) with the general circulation space on 749' elevation of the Unit 1(2) reactor building.

SUMMARY:

- I. No. Opening of door 504 (505) does not increase the probability of occurrence or the consequences of an accident or the malfunction of equipment important to safety, as previously evaluated in the SAR. The door is not specifically noted as required by any FSAR analysis. FSAR Chapters 3, 6, 9, 12, and 15 and NUREG 0776 were reviewed. Door 505 does form part of an Appendix R credited fire boundary, and entry into TRO 3.7.3.7 is required when the door is propped open. The above FSAR sections were also reviewed to determine if the main steam tunnel room coolers were credited. This review determined that the main steam tunnel coolers are not explicitly mentioned in the FSAR and the Environmental Qualification (EQ) temperature limits can be maintained with one room cooler.
- II. No. The proposed modification does not create an accident or malfunction of a different type than any evaluated previously in the FSAR. Door 504 (505) creates a boundary between the RBMST and the open circulation area on elevation 749' of the Unit 1 (Unit 2) reactor building. The door is assumed closed for design basis calculations of environmental conditions, flooding, missiles, fire, etc. With the door open, the potential exists for different consequences (i.e., slightly higher temperatures) from transients, but the open door will not initiate a new accident or cause a different malfunction. Review of all potential barrier functions shows that the existing SSES design contains sufficient conservatism such that the door may be propped open without impacting the ability to achieve safe shutdown. This is acceptable as long as door 504 (505) is closed when left unattended and if the standby Main Steam Tunnel Cooler is prevented from automatically starting on high temperature. FSAR Sections 3, 6, 9, 12 and 15 were also reviewed to determine if the main steam tunnel room coolers were credited. This review determined that the main steam tunnel coolers are not explicitly mentioned in the FSAR and the EQ temperature limits can be maintained with one room cooler.
- III. No. RBMST door opening affects no Technical Specifications, assuming the compensatory actions are taken, and does not reduce the margin of safety as defined in the bases of any Technical Specification. Door 505 is a fire door and requires entry to TRO 3.7.3.7. The basis for Section 3.6.4.1 "Secondary Containment" was reviewed. The RBMST and the circulation area of 749' of the reactor building are both in ventilation Zone I (II). Opening of the door does not affect the ability to maintain reactor building required vacuum, and does not disable SLD (Section 3.3.6.1, "Primary Containment Isolation Instrumentation"), assuming the main steam tunnel room cooler is prevented from starting on a high temperature signal. Procedures assure compliance with Technical Specification Section 5.7, which requires administrative controls of high

radiation area barriers. Opening of door 504 (505) will not reduce the margin of safety as defined in the bases section of the Technical Specifications.

SER NO: 01-320

CROSS REFERENCE: NL-99-046, Unit 1 and Unit 2

DESCRIPTION OF CHANGE:

This change evaluates Procedure EP-DS-005, 'Loss of All Decay Heat Removal', a new damage support procedure which is used to remove decay heat with Reactor Water Cleanup (RWCU) and to add heat capacity to the Suppression Pool by adding water. Note: The complete loss of all other methods of decay heat removal, in which this procedure would be used, is outside the design basis of the plant, therefore, any reference to FSAR or Technical Specifications does not apply.

SUMMARY:

- I. No. Procedure EP-DS-005 is performed in response to outside design bases events, therefore, the procedure and/or its performance has no effect on events previously evaluated in the SAR.
- II. No. Since procedure EP-DS-005 is not performed in design bases events; the procedure and/or its performance will not increase the probability or consequence of other events previously analyzed in the SAR. RWCU is capable of removing decay heat. PPL calculation determined that the system lineup used to remove decay heat does not violate any RWCU equipment design parameters. RWCU equipment analyzed includes the pumps, regenerative heat exchangers, non-regenerative heat exchangers, and Reactor Building Closed Cooling Water heater exchangers. Therefore, RWCU adequately operates in this mode and does not create the possibility of an accident or malfunction of a different type.
- III. No. Since the procedure becomes active only in outside design bases events, the procedure and/or its performance does not affect, and is not affected by, the Technical Specifications. Therefore, the proposed action does not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-321

CROSS REFERENCE: DCP 314423, Unit 2

DESCRIPTION OF CHANGE:

This change replaces six existing AVCO direct acting solenoid valves with six AVCO pilot operated quick exhaust models and increases the instrument tubing diameter for six Zone 2 Reactor Building Isolation Dampers.

SUMMARY:

- I. No. The proposed action does not affect the spectrum of postulated events for which transients or anticipated operational occurrences and accident conditions were analyzed. The proposed modification maintains operability of the Reactor Building Ventilation System, as referenced in FSAR Section 9.4.2, and the Instrument Air System stated in FSAR Section 9.3.1.1. There are no new safety concerns or conditions affecting safety not evaluated or discussed in Sections 6 and 15 of the FSAR. This modification does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.
- II. No. The proposed changes do not involve a postulated initiating event that would create the possibility of an accident of a different type. The proposed action will not degrade any structure, system, or component in performing its safety function. The safety function of the Zone 2 secondary containment isolation dampers is to isolate on receiving a LOCA or manual isolation signal. The fail safe design feature that closes a damper upon loss of air remains the same. Since this basic function will not change as a result of this modification, this modification does not create a possibility for an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.
- III. No. The proposed action, in part, installs quick exhaust type solenoid valves and larger sized instrument tubing to reduce the damper closure times to meet Technical Specification Table B3.6.4.2-1 stroke times. This maintains the health and safety of the public because damper closure within the specified stroke times has no dose consequences. The proposed modification will not change the function of the safety-related power distribution system as delegated by Technical Specification Bases B3.8.1, B3.8.2, B3.8.4, B3.8.5, B3.8.7, and B3.8.8. No degradation to any safety-related power supply or power distribution circuit occurs. The proposed action does not create any new failure modes and maintains the margin of safety as delineated in the Technical Specifications. Fail-safe operation of the secondary containment isolation dampers is maintained. Therefore, the margin of safety is not reduced.

SER NO: 01-322

CROSS REFERENCE: T-Mods 310437, 310440, 310441, 310442, 310444 and 316669, Unit 1 and Unit 2

DESCRIPTION OF CHANGE:

This change provides temporary wireless telephone service to Reactor Building elevation 818', E Diesel Generator Building, A through D Diesel Generator Bays, Unit 2 Reactor Building elevations 749' and 719, Unit 2 Drywell, Unit 2 Turbine Building elevation 729', and Unit 2 Control Structure elevations 754' and 699'.

SUMMARY:

- I. No. Expansion of the Unlicensed-band Personal Communications Service (U-PCS) to support the U2-10RIO will not increase the probability of occurrence or the consequences on an accident or malfunction of equipment important to safety as previously evaluated in the FSAR. The system will not affect the proper functioning of either safety or non-safety systems, or adversely affect either Security Plan or Emergency Plan communications equipment.
- II. No. Installation and use of the expanded wireless telephone system will not create a new initiator or failure not considered in the FSAR. Testing will demonstrate that the system has no effect on any electronic controllers, indicators or recorders in safety and non-safety systems in the U-PCS coverage area.
- III. No. Installation and use of the expanded wireless telephone system does not reduce the margin of safety as defined in the basis for any Technical Specification. Use of the telephone system is not contained in any Technical Specification Basis or Technical Specification. The proposed system meets or exceeds all acceptability criteria of NUREG-0800 section 9.5.2 on Communications Systems.

SER NO: 01-323

CROSS REFERENCE: NL-01-005, Unit 2

DESCRIPTION OF CHANGE:

The proposed action includes the change to the Unit 2 reactor core loading to support Cycle 11 operation. This action also addresses the Implementation of GE Marathon control blades, previously reviewed and approved by the NRC.

SUMMARY:

- I. No. The applicable sections of the FSAR related to the core loading and the licensing events that have been evaluated for U2C11 including the use of Marathon Control Blades are Chapters 4, 5, 6, 9, and 15.

All fuel in the U2C11 core was determined to meet the required mechanical, thermal-hydraulic, and nuclear design criteria, and therefore the fuel is fully capable of performing its intended design function. Furthermore, the U2C11 core loading does not directly or indirectly affect the functioning, performance, reliability, response time, power supplies, cooling, or lubrication of any plant systems. The GE Marathon control blades were determined to be directly interchangeable with the existing GE Duralife 160C control blades currently in use at SSES (i.e., the form, fit, and function of Marathon control blades are identical to that of the Duralife 160C control blades). Therefore, the Unit 2 Cycle 11 core loading, including the use of GE Marathon control blades, will not increase the Probability of occurrence of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR. The results of the U2C11 analyses were used to determine the Minimum Critical Power Ratio (MCPR) Operating Limits for all power/flow conditions allowed by the Power/ Flow Map. Thus, for all anticipated operational occurrences, neither the MCPR Safety Limit nor the transient Linear Heat Generation Rate (LHGR) limit (to protect against 1% cladding strain and centerline melt) will be violated. Therefore, no fuel failures or dose consequences are expected from these events. The following reactivity related evaluations were also performed: 1) Core Shutdown Margin (SDM) 2) Standby Liquid Control System (SLCS) shutdown capability, and 3) Fuel Storage Criticality. Results of these evaluations demonstrated that U2C11 has adequate shutdown margin, and the SLCS can provide sufficient boron to keep the core subcritical (cold, xenon-free). The new fuel vault and spent fuel pool meet their acceptance criteria and remain subcritical.

Additional analyses and evaluations addressed the impact of ATRIUM™-10 fuel and the 24 month cycle on decay heat, the radioactive source terms, Heavy Loads (movement of heavy loads over irradiated fuel), Post-LOCA hydrogen generation (hydrogen recombiners), Equipment Qualification (In-Containment Emergency Equipment), LOCA electrical time lines (electrical supply), Suppression Pool Heat Load, Spray Pond Analysis, Spent Fuel Pool Boiloff Analysis, Public and Occupational Dose, ATWS, Recirculation Pump Performance, LOCA offsite dose, the Emergency Plan, and the EOPs. The results of these analyses demonstrated that the applicable acceptance criteria for these evaluations are met for U2C11.

Therefore the proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.

- II. No. The Unit 2 Cycle 11 core loading does not directly or indirectly affect any plant system, equipment, or component (other than the core itself, and therefore does not affect the failure modes of any of these. The GE Marathon control blades were determined to be equivalent in form, fit, and function to the current Duralife 160Cs and are directly interchangeable. The U2C11 COLR establishes the correct operating limits for the U2C11 core, thus assuring that applicable acceptance criteria will be met for U2C11. Therefore, these changes do not create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. The U2C11 core loading and associated operating limits do not jeopardize or degrade the function or operation of any plant system or component governed by Technical Specifications. Because the GE Marathon control blades are identical in form, fit and function to the blades they replace, their use does not jeopardize or degrade the function or operation of any plant system or component governed by Technical Specifications. Analyses generated U2C11 operating limits for the SPC ATRIUM™-10 assemblies that will maintain an equivalent margin of safety as currently defined in the basis of the applicable Technical Specification sections.

Additional analyses and evaluations addressed the impact of ATRIUM™-10 fuel and the 24 month cycle on decay heat, the radioactive source terms, Heavy Loads (movement of heavy loads over irradiated fuel), Post-LOCA hydrogen generation (hydrogen recombiners), Equipment Qualification (In-Containment Emergency Equipment), LOCA electrical time lines (electrical supply), Suppression Pool Heat Load, Spray Pond Analysis, Spent Fuel Pool Boiloff Analysis, Public and Occupational Dose, ATWS, Recirculation Pump Performance, LOCA offsite dose, the Emergency Plan, and the EOPs. The results of these analyses demonstrated that the applicable acceptance criteria for these evaluations are met for U2C11. Therefore, this change does not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-324

CROSS REFERENCE: DCP 225634, Unit 1

DESCRIPTION OF CHANGE:

The proposed action replaces the 30 Amp control power fuses C72A-F45B and C72A-F46B in panel 1C611 located in the Lower Relay Room with 5 Amp fuses, thereby providing coordination with the 20 amp feeder breaker 1D624 Breaker 11.

SUMMARY:

- I. No. Replacing the control power fuses for the Reactor Recirc Pump Trip (RPT) Breaker 4A RPT control circuit in 1C611, while not changing the control logic does not introduce a new device or source of power which would compromise the function of the safe shutdown components. The control power fuses coordinate with the 125 VDC Distribution Panel supply circuit breaker 1 D624 Breaker 11 and provide adequate protection for their control circuit cables. As evaluated in calculations, the new 5 amp fuse rating is acceptable for the existing load.

For a Control Room fire, the operator action to manually initiate the RPT function by tripping the 13.8 KV circuit breakers 1A10110 and 1A10210 maintains the ability to safely shutdown the reactor within the criteria specified in Appendix R Section III. G. Therefore, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR is not increased by the proposed action.

- II. No. There are no control logic changes to the RPT Breaker 4A RPT control circuit. The new 5 Amp fuse rating is acceptable for the existing load per calculation. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR is not created.
- III. No. Operability of the RPT Instrumentation is addressed by Technical Specification Section 3.3.4.1, "End of Cycle Recirculation Pump Trip (EOC-RPT) Instrumentation". Replacement of the 30 Amp fuses on the RPT Breaker 4A RPT control circuit with 5 Amp fuses does not affect the margin of safety provided by the EOC-RPT instrumentation, as the RPT control logic and setpoints are not being changed. Replacement of the fuses has no impact to the margin of safety for operation of the Reactor Recirculation System. Therefore, the proposed action does not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-325

CROSS REFERENCE: DCP 318947, Unit N/A

DESCRIPTION OF CHANGE:

This modification will eliminate the potential for an open flowpath between outside air and the Control Structure Pressurization Envelope by removing and blanking off a section of HVAC duct between the Control Structure Elevator Machine Room and Outside Air.

SUMMARY:

- I. No. Based upon a review of the FSAR, none of the affected systems are included as an initiating event for any accident in the FSAR, the required redundancy of safety-related equipment shall be maintained, the 1/8" positive pressure during normal operation (and also under accident conditions) shall be maintained, all systems shall function (in all modes of operation) as described in the FSAR. Air in-leakage shall be limited as defined in the FSAR, and room temperatures shall be within the FSAR prescribed limits. This modification shall assure that control room operators will be adequately protected against the effects of accidental release of toxic and radioactive gases and that the nuclear power plant can be safely operated or shut down under design basis accident conditions (Criterion 19, "Control Room," of Appendix A, "General Design Criteria for Nuclear Power Plants," to 10 CFR Part 50). By eliminating the potential open pathway between the outside air and the Control Structure Pressurization Envelope via this modification, compliance with this licensing commitment is assured. Therefore, the proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the FSAR.
- II. No. The function of safety-related system are not changed, nor is the design basis of any system or structure. All changes performed under this modification are designed and installed in accordance with applicable Codes and Standards to ensure their design and construction integrity. In addition, no system interfaces are adversely affected. The new interface created between Control Structure HVAC and C-706 will not result in adversely effecting any design requirement. Therefore, this modification will not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.
- III. No. This modification does not change the function of any plant system governed by the Technical Specifications, Tech Spec Basis, or the Technical Requirements Manual and none of the parameters that are the basis for the Technical Specifications and no operating or accident parameters will be impacted by this modification. Therefore, the actions taken by this modification will not reduce any margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-326

CROSS REFERENCE: DCP 318280, Unit 1 and Unit 2

DESCRIPTION OF CHANGE:

The modifications replace the Standby Liquid Control System (SLCS) pump discharge pipe pressure relief valve springs and raise their setpoint from 1400 psig to 1500 psig . They also replace the SLCS pump 600 # discharge flanges with 1500 # flanges. The pressure ranges for the SLCS accumulators will be raised, as required.

SUMMARY:

- I. No. The modifications do not increase the probability of occurrence or the consequences of an accident or a malfunction of equipment important to safety, as previously evaluated in the FSAR. The changes to the SLCS pressure relief valves and the pump discharge flanges are needed to raise the Design Pressure of SLCS to 1500 psig. The SLCS is not an initiator of any transient or accident described FSAR. The changes have no effect on the probability of any analyzed accidents.

Replacing the SLCS pump discharge pipe pressure relief valve springs with original equipment manufacturer springs and raising their setpoint from 1400 psig to 1500 psig does not increase the probability of a malfunction of the relief valves. Replacing the SLCS pump 600 # discharge flanges with 1500 # flanges does not increase the probability of a malfunction of the system pipe. All components protected by the pump discharge relief valves have been reviewed to ensure that they can withstand the higher design pressure.

This modification does not change the SLCS function. The purpose of this modification is to increase the reliability of the system to operate at higher pressures during an Anticipated Transient Without Scram (ATWS).

- II. No. The modifications will not create the possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR. The modifications raise the Design Pressure for the SLCS discharge pipe outside the primary containment. The modifications do not change the SLCS function. The only different type of accident, which could occur, would be a failure of some component in this line due to over-pressurization with a resulting failure to inject. All components protected by the pump discharge relief valves have been reviewed to ensure that they can withstand the higher Design Pressure.
- III. No. The modifications do not reduce the margin of safety as defined in the basis for any Technical Specification (Reference Technical Specification Bases B 3.1.7). The 1500 psig Design Pressure is needed to restore compliance for two pump operation of the SLCS during an ATWS. The higher design pressure enhances the ability of the SLCS to inject a neutron absorbing solution under all analyzed ATWS scenarios thus restoring the margin of safety as it applies to 10 CFR50.62. Therefore, the modifications do not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-327

CROSS REFERENCE: NL-01-008, Unit 1 and 2

DESCRIPTION OF CHANGE: This change removes all technical requirements for the Loose Parts Monitoring System (LPMS) from the Unit 1 and Unit 2 Technical Requirements Manual.

SUMMARY:

- I. No. The removal of all Technical Requirements for the Loose Parts Monitoring System from the Unit 1 and Unit 2 Technical Requirement Manual has no effect on any safety function. The Loose Parts Monitoring System is not used in mitigation of any accident described in the FSAR. The failure or malfunction of these components will not initiate any accident or transient evaluated in Chapters 6 or 15 of the FSAR. The failure or malfunction of these components will not affect any system important to safety.

The Loose Parts Monitoring system did not provide the safety benefits initially envisioned in the 1970's. The risk insights from several hundred years of plant experience indicate that there are no differential effects on core damage and/or early release fractions, whether LPM systems are used or not.

Therefore, it can be concluded that the removal of all Technical Requirements for the Loose Part Detection System from the Unit 1 Technical Requirement Manual will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR.

- II. No. This change makes no physical changes to the equipment. The equipment continues to conform to all design requirements and applicable codes and standards of construction.

The removal of all Technical Requirements for the Loose Parts Monitoring System from the Unit 1 and Unit 2 Technical Requirement Manual does not serve as the basis for any initiating event. It is a monitoring system only. Therefore, the removal of all Technical Requirements for the Loose-Parts Monitoring System from the Unit 1 and Unit 2 Technical Requirement Manual does not create a possibility for an accident or malfunction of a different type than any previously evaluated in the FSAR.

- III. No. The Loose Parts Monitoring System does not affect any safety or non-safety system which is an initiator or mitigator to any accident or transient analyzed in the FSAR. In addition, it does not impact any system or component which is controlled by the Unit 1 or Unit 2 Technical Specifications. The operability of the Loose Parts Monitoring System is controlled by the Technical Requirements Manual. Therefore, it can be concluded that the removal of all Technical Requirements for the Loose-Parts Monitoring System from the Unit 1 and Unit 2 Technical Requirement Manual does not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO: 01-328

CROSS REFERENCE: DCPs 237874 and 237880, Unit 1 and Unit 2

DESCRIPTION OF CHANGE:

This modification removes bonnet vent piping from the reactor recirculation pump suction and discharge valves 2F023A and 2F031A, eliminates stem leakoff piping for the reactor recirculation bypass valves 2F032A and 2F032B, eliminates drain piping from Recirc suction elbows, and adds a new pipe support on the "B" recirculation pump seal water drain and sample line to reduce the potential for pipe cracks due to high vibration.

SUMMARY:

- I. No. Based upon a review of the FSAR Sections 3.9, 12.2. 16 & ODCM, the initiating event which includes the components affected by this modification is the recirculation pump shaft break and a small break LOCA. The probability of these events occurring is not increased because these modifications do not change the interface between the recirculation motor and the shaft and also eliminates piping that could cause a LOCA. The failure probability of the affected piping is decreased because the support added reduces the probability of pipe cracking due to vibration, while not increasing the probability of pipe cracking due to other failure mechanisms. The affected components interface with the drywell and the recirculation pumps, which perform safety-related functions. The probability of a malfunction of this equipment is not increased because their interface is not affected and there is no change in the fluid properties within the piping which would result in an increase in the rate of drywell leakage. There are no new radiological pathways created and no radiological increase from existing pathways caused by this modification, as a result of an accident or a malfunction of equipment.
- II. No. The possible failure modes of the modified piping were evaluated for new impacts upon plant equipment and previously evaluated initiating events. No new impacts were identified. The modified system configuration conforms to the applicable construction Codes and Standards. The interfaces with equipment important to safety are unaffected by this modification since no new impacts were identified. Therefore, this modification will not result in an accident or malfunction of a different type being created for equipment important to safety.
- III. No. Based upon a review of the design parameters involved with this modification, none which serve as the basis for a margin of safety, as presented in the SSES Technical Specifications, are adversely affected by the modifications. Therefore, this modification does not reduce any margin of safety which serves as the basis for any Technical Specification or Technical Requirement.

SER NO: 01-329

CROSS REFERENCE: DCP 322168, Unit 1, Unit 2 and Common

DESCRIPTION OF CHANGE:

The purpose of this modification is to defeat the operation the loose parts monitor, and to remove the vibration monitor sensors, where those sensors interfere with vessel nozzle inspections, in SSES Unit 2 for the U210RIO. VE-24177B will not be removed from the field. The remaining Unit 2, and all Unit 1, components will be' abandoned in-place, pending a future modification for complete removal of the system from each Unit.

SUMMARY:

- I. No. Removal of the Loose Parts Monitoring System (LPMS) from Unit 1 and 2 has no effect on any safety function. Prior to its removal from the Technical Requirements Manual, the purpose of the LPMS was to ensure that sufficient capability was available to detect loose metallic parts in the primary system and avoid or mitigate damage to primary system components. Effective with that change, this function is no longer required to be operable. The Loose Parts Monitoring System is not used in mitigation of any accident described in the FSAR.

Partial removal or disabling the LPMS system components, or the failure or malfunction of those components which remain, will not affect any system important to safety. The failure or malfunction of these components will not initiate any accident or transient evaluated in Chapters 6 or 15 of the FSAR.

The approved topical report provides the safety basis for eliminating the LPMS function. The LPMS system did not provide the safety benefits initially envisioned in the 1970's. The risk insights from several hundred reactor-years of plant experience indicate that there are no differential effects on core damage and/or early release fractions, whether LPM systems are used or not.

Removal of the Loose Parts Detection System function from Unit 2, or the abandonment in-place of portions of the system, will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR.

- II. No. Removal of the Loose Parts Monitoring System from Unit 1 and 2 has no effect on any plant function. The lack of a Loose Parts Monitoring System will not create the possibility for any accident or malfunction not described in the FSAR.

Partial removal or disabling the LPMS system components, or the failure or malfunction of those components which remain, will not affect any system important to safety. The failure or malfunction of these components will not initiate any different type of accident or transient than were evaluated in Chapters 6 or 15 of the FSAR.

Removal of the Loose Parts Detection System function from Unit 2 or the abandonment in-place of portions of the system, will not create the possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.

- III. No. Removal of the Loose Parts Monitoring System from Unit 1 and 2 has no effect on any plant function. Prior to its removal from the Technical Requirements Manual, the purpose of the LPMS was to ensure that sufficient capability was available to detect loose metallic parts in the primary system and avoid or mitigate damage to primary system components. Effective with that change, this function is no longer required to be operable. The lack of a Loose Parts Monitoring System will not reduce the margin of safety as defined in the basis for any Technical Specification.

Partial removal or disabling the LPMS system components, or the failure or malfunction of those components which remain, will not reduce the margin of safety as defined in the basis for any Technical Specification. The failure or malfunction of these components will not affect the plant response to any type of accident or transient evaluated in Chapters 6 or 15 of the FSAR.

SER NO.: 01-330

CROSS REFERENCE: NL-00-044, Unit 1 and 2

DESCRIPTION OF CHANGE: This action revises the COMPLETION TIME to TRO 3.2.2 of the Technical Requirements Manual to address required actions to return failed equipment to operable status when a component or subsystem of the Seismic Monitoring System is located in containment and therefore can not be returned to service in 30 days.

SUMMARY:

- I. No. The loss of the Seismic Monitoring Subsystem: Reactor Equipment, Unit I (VT-15702) and associated components inside containment has no effect on any safety function. The recordings from the components (Reactor Equipment, Unit 1 seismic monitoring) are used in a post earthquake evaluation of the plant's condition by engineering and others to determine if it is safe to restart. Thus, the operator's decision making process as to whether or not to shutdown the plant is not affected. The Reactor Equipment Unit 1 (VT-15702) and associated components inside containment are not used in mitigation of any accident described in the FSAR. The failure or malfunction of these components will not initiate any accident or transient evaluated in Chapters 6 or 15 of the FSAR. The failure or malfunction of these components will not affect any system important to safety and it will not change the probability of a seismic event occurring. Therefore, the loss of the Seismic Monitoring Subsystem Reactor Equipment, Unit 1 (VT-15702) and associated components inside containment for greater than 30 days will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR.
- II. No. The Seismic Monitoring Subsystem: VT-15702, Reactor Equipment, Unit I and associated components inside containment, provide information used in a post earthquake evaluation of the plant's condition. The equipment continues to conform to all design requirements and applicable codes and standards of construction. Also, the loss of the Seismic Monitor does not serve as the basis for any initiating event, nor does it interface with any component which does. Therefore, the loss of the Seismic Monitoring Subsystem. VT-15702, Reactor Equipment, Unit I and associated components inside containment for greater than 30 days does not create a possibility for an accident or malfunction of a different type than any previously evaluated in the FSAR.
- III. No. The Seismic Monitoring Subsystem: Reactor Equipment, Unit I (VT-15702) and associated components inside containment do not affect or interface with any safety or non-safety system which is an initiator or mitigator to any accident or transient analyzed in the FSAR. In addition, it does not interface with or impact any system or component which is controlled by the Unit 1 or Unit 2 Technical Specifications. The operability of the Seismic Monitoring Subsystem: Reactor Equipment, Unit I (VT-15702) and associated components inside containment is controlled by the Technical Requirements Manual. Therefore, the loss of this Seismic Monitoring subsystem or any of its components inside containment for greater than 30 days does not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO.: 01-331

CROSS REFERENCE: NL-99-086, Unit 1 and 2

DESCRIPTION OF CHANGE:

Revise RE-0TP-011, RE-1(2)TP-012, and TS BASES 3.3.1.1.8 to allow for Local Power Range Monitor (LPRM) calibration with up to 42% (i.e., 18 out of 43) TIP strings unavailable.

SUMMARY:

- I. No. Reviewed FSAR Sections 4.4.7.6.1a.5.5, 7.7.1.6, 7.7.1.7, and Chapter 15. The proposed action does not perform any tests or modifications to any plant structures, systems, or components. The Traversing in-core Probe (TIP) subsystem will still provide local flux measurements to be used for calibration of the LPRM subsystem. The LPRM subsystem will continue to provide input to the POWERPLEX®-II CMS, reactor manual control system, and APRM subsystem. The ability of the LPRM subsystem to measure changes in neutron flux used by the reactor manual control system and APRM subsystem to determine control rod block and scram signals is not changed. The ability of the POWERPLEX®-II CMS to calculate core thermal links is not changed. The proposed action can increase the LPRM measurement uncertainty. However, the methodology used to develop the power distribution limits described in TS Section 3.2 account for potential increase in the LPRM measurement uncertainty and is already included in FSAR Section 4.4. Also, the SUBTIP option within the POWERPLEX®-II CMS has been tested and verified. Therefore, the proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.
- II. No. Reviewed FSAR Sections 4.4.7.6.1a.5.5, 7.7.1.6, 7.7.1.7, and Chapter 15. The proposed action does not perform any tests or modifications to any plant structures, systems, or components. The ability of the TIP, LPRM and POWERPLEX®-II CMS to perform their functions described in the SAR are not affected by the proposed action. Any increase in LPRM measurement uncertainty is accounted for in the methodology used to determine the power distribution limits. The information provided to the operators from the POWERPLEX®-II CMS and LPRM subsystem does not change. Finally, the TIP, LPRM and POWERPLEX®-II CMS do not initiate or mitigate any accidents described in the SAR. Therefore, the proposed action does not create the possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. Reviewed TS 2.1, 3.2.1, 3.2.2, 3.2.3, 3.2.4 and 3.3.1.1.

The proposed action allows the use of both measured and calculated local flux profiles to calibrate the LPRMs to satisfy the requirements of TS SR 3.3.1.1.8. The use of calculated local flux profiles can increase the LPRM measurement uncertainty. The methodology used to develop the Minimum Critical Power Ratio (MCPR) Safety Limit described in TS BASES 2.1 and the power distribution limits described in the TS BASES 3.2.1 (APLHGR), 3.2.2 (MCPR), 3.2.3 (LHGR), and 3.2.4 (APRM Gain and Setpoints) accounts for the additional LPRM measurement uncertainty. Therefore, the bases for the MCPR Safety Limit and the power distribution limits are not affected by the proposed

action. In addition, the proposed action clarifies BASES for TS SR 3.3.1.1.8 to allow use of both measured and calculated local flux profiles to calibrate the LPRMs. Therefore, the proposed action does not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO.: 01-332

CROSS REFERENCE: NL-00-023, Unit 1 and 2

DESCRIPTION OF CHANGE: This change documents the method used to satisfy the wind speed sensor calibration technical requirement.

SUMMARY:

- I. No. The proposed action is a clarification of the 10-meter and 60-meter wind speed sensor channel calibration methodology. This change does not affect the spectrum of postulated events for which transients or anticipated operational occurrences and accident conditions were analyzed. This modification does not increase the probability of occurrence of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR.
- II. No. The proposed action is a clarification of the 10-meter and 60-meter wind speed sensor channel calibration methodology. The proposed action does not increase the probability of an accident or malfunction of equipment important to safety because:
 - 1) It does not degrade the performance of a safety system assumed to function in the accident analysis;
 - 2) It does not increase the challenges to safety systems assumed to function in the accident analysis;
 - 3) It does not increase the probability of failure of systems designed to reduce the challenges to safety systems assumed to function in the safety analysis;
 - 4) It does not change the performance of systems designed to reduce challenges to safety systems such that the system no longer reduces challenges to the safety system as effectively as it did before.

The proposed action maintains the commitment to provide meaningful protection to ensure safe operation of the unit. There is no increase in the probability of an inadvertent release since the modification involves no changes to equipment or logic in which these types of failures could result. Based on the above, there will be no increase in the probability of occurrence of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR and no different types of scenarios created.

- III. No. The proposed action is to clarify the 10-meter and 60-meter wind speed sensor channel calibration methodology. The proposed action does not affect any physical parameters, instruments, response times, redundancy and/or independence of components. Therefore, no margin of safety is reduced.

SER NO.: 01-333

CROSS REFERENCE: NL-00-018, Unit 1 and 2

DESCRIPTION OF CHANGE:

This change corrects and clarifies the Fire Protection Review Report (FPRR) regarding wet standpipes and hose stations.

SUMMARY:

- I. No. The proposed change documents in the FPRR the fact that some of the existing hose stations may not be sufficient to reach all extents of each area. This change also documents that the Fire Brigade is trained in using fire hose stations including the necessary actions to be taken should additional fire hose be needed. There are no components that are affected and therefore does not increase the probability of occurrence of an accident. The consequences of an accident or malfunction of equipment important to safety is not affected since there are no components affected by this change and the Fire Brigade is trained in actions to be taken when insufficient fire hose is present.
- II. No. The proposed action does not create a possibility for an accident or malfunction of a different type than previously evaluated. The proposed change documents in the FPRR the fact that some of the existing hose stations may not be sufficient to reach all extents of each area. This change also documents that the Fire Brigade is trained in using the fire hose stations including the necessary actions to be taken should additional fire hose be needed.
- III. No. The proposed FPRR change does not reduce the margin of safety. This change documents that the Fire Brigade is trained in using fire hose stations including the necessary actions to be taken should additional fire hose be needed. This is standard fire fighting training, strategy and tactics regarding fire hose use.

SER NO.: 01-334

CROSS REFERENCE: DCP 225635, Unit 2

DESCRIPTION OF CHANGE:

The proposed action separates the six Division 1 Automatic Depressurization System (ADS) Safety Relief Valve (SRV) solenoid valves and related control circuits from the sixteen Division 1 SRV solenoid valves and related control circuits and the ADS and Core Spray automatic control logic.

SUMMARY:

- I. No. Chapter 6 and 15 of the FSAR, the FPRR, the Design Assessment Reports, the current Core Operating Limits Report in the Technical Requirements Manual and the Technical Requirements Manual Section 3.5.1, "ADS Manual Inhibit" were reviewed to determine if the proposed action has an effect on the spectrum of postulated initiating events for which transients or anticipated operational occurrences and accident conditions were analyzed. Powering the Division 1 ADS SRV solenoid valves and related control circuits from the dedicated circuit breaker 2D614 Breaker 18, while not changing the ADS control logic does not introduce a new device or source of power which would compromise the function of the safe shutdown components and system. There are no impacts on equipment important to safety. The proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety.
- II. No. Transfer of the six Division 1 ADS SRV solenoid valves and related control circuits from Division 1, Channel A, 125 VDC Distribution Panel 2D614 Breaker 03 to 2D614 Breaker 18 does not create a new initiating event because the main power source remains the same and there is no change to the ADS automatic or manual control logic. Therefore, the proposed action does not create the possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR.
- III. No. The proposed action does not make any changes to ADS setpoints or control logic functions which would impact the margin for safe operation of ADS. The Technical Specifications and Technical Specification Bases Section 3.5.1 were reviewed in making this determination. Therefore, the proposed action does not reduce the margin of safety as defined in the Bases for any Technical Specifications.

SER NO.: 01-335

CROSS REFERENCE: DCP 239383, Unit N/A

DESCRIPTION OF CHANGE:

This change permanently eliminates the Diesel generator Intercooler Flow Measuring Piping Taps

SUMMARY:

- I. No. Based upon a review of the FSAR (Sections 1.2.2, 7, 8.3.1.4, 8.1.6.5, 9.2.5, 9.5.4 - 9.5.6, 14, 15, Tables 3.2-1, 3.9-16, 3.9-17, Questions 040.1, 10, 11 & 90), the ODCM, the FPRR, the SSES Safety Evaluation Report and its supplements, with respect to this modification, none of the components (or systems) affected by this modification are included, as initiating events. The FSAR does identify events that include the failure of any of the four diesel generators (tied into the plant at the time of the event) and events where one division of Emergency Service Water is unavailable. The components affected by this modification will not adversely impact the probability of either of these two failure types because the final piping configuration reduces the probability of the joint failing because the moment arm is eliminated and the dissimilar metal connection is eliminated. None of the systems impacted by this modification represent barriers to a radiological release. Therefore, the proposed action does not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, as previously evaluated in the SAR.
- II. No. This modification will ensure that all appropriate codes and standards are used (while maintaining some ability to install flow monitoring equipment, if necessary). Also, no new interfaces with components (or systems) have been created nor are existing ones adversely affected and finally, a carbon steel-to-stainless steel interface is being deleted which serves as an "attack area" for galvanic corrosion. Therefore, the proposed action does not create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. Based upon a review of the documents listed above, a review of the Technical Specifications and Bases (Sections 3.7.2, 3.8), and the Technical Requirements Manual (TRM, Sections 3.7, and 3.8.3), no parameters which include a margin of safety are affected by this modification. Therefore, the proposed action does not reduce the margin of safety as defined in the basis for any Technical Specification.

SER NO.: 01-336

CROSS REFERENCE: NL-99-059, Unit N/A

DESCRIPTION OF CHANGE:

This evaluation updates FSAR Figure 9.2-10 and FSAR Section 9.2.11.5 by incorporating previous modifications (including plant expansion) performed on the Sewage Treatment Plant (STP).

SUMMARY:

- I. No. The modifications performed to the STP do not increase the probability of an accident or malfunction of equipment important to safety as previously stated in the FSAR. FSAR Section 9.2-11 describes the STP system as a non-safety related system. Failure of this system will not compromise any safety-related system or component or prevent safe shutdown of the plant.
- II. No. The modifications performed to the STP do not create a possibility for an accident or malfunction of a different type than any evaluated previously in the FSAR. FSAR Sections 2.4.13.3 and 15.7.3 describe the design basis accidents for liquid releases into the groundwater and air. Current operation and design are bounded by these analyses.
- III. No. The modifications performed to the STP do not reduce the margin of safety as defined in the basis for any Technical Specification. The availability or operational characteristics of any system, structure or component that is governed by or required to be operational by Technical Specifications is not affected by these modifications. Section 5.5 of the Technical Specifications discusses radioactive effluent releases. The Offsite Dose Calculation Manual (ODCM) Attach. B lists the STP as an insignificant effluent pathway. Routine sampling, monitoring and reporting of liquid effluent of the STP is implemented consistent with the requirements of the ODCM and Section 3.11 of the Technical Requirements Manual (TRM).

SER NO.: 01-337

CROSS REFERENCE: NL-99-076, Unit 1 and Unit 2

DESCRIPTION OF CHANGE:

The proposed changes include revising the location of testing for dissolved oxygen in the sewage treatment plant from the chlorine contact chamber (effluent) to the treatment beds, the use of an epoxy coating on the condenser waterboxes rather than the potential use of a cathodic protection system and incorporating additional approved paints for the Standby Gas Treatment System (SGTS) and Control Structure Emergency Outside Air Supply System (CREOASS).

SUMMARY:

- I. No. This safety evaluation supports FSAR changes identified as part of the chemistry review required by CR 96-0647. The proposed changes to FSAR Sections 9.2.11.4 and 10.4.1.3.2 and FSAR Tables 6.5-5 and 6.5-6 incorporate the existing operating or design bases which are presently shown incorrectly in the FSAR. These changes do not create or result in any additional physical changes to the plant equipment, procedures or training. No safety related functions are affected by the changes. Therefore, the proposed changes to the FSAR do not increase the probability or consequences of an accident or malfunction of equipment important to safety previously evaluated in the SAR.
- II. No. The proposed changes incorporate the approved existing operating and design bases and have not created a safety-related function nor affect any existing safety-related function. These changes have not increased the probability of any of the accidents described in FSAR Chapter 15. Therefore, the proposed changes do not create a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR.
- III. No. The sewage treatment plant and the circulating water side of the condensers are not addressed in the Technical Specifications. The use of other approved paints on the SGTS or CREOASS will not affect the operability of either system or the integrity of the secondary containment. As a result, the proposed changes do not reduce the margin of safety as defined in the basis for any Technical Specification. Technical Specifications sections 3.3.7.1, 3.6.4.1, 3.6.4.3, 3.7.3, 3.7.5, 3.7.6 and 5.5 were reviewed.