

DESCRIPTION OF PROPOSED CHANGE NPF-15-2 AND SAFETY ANALYSIS
AMENDMENT APPLICATION NO. 1, OPERATING LICENSE NPF-15

This is a request to revise Technical Specification 3.9.8.2.

Existing Specification

See Attachment A

Proposed Specification

Add a footnote to Technical Specification 3.9.8.2 to read as follows:

#Both shutdown cooling trains may be removed from operation for up to 1 hour per 8 hour period during the performance of CORE ALTERATIONS in the vicinity of the reactor pressure vessel hot legs during initial core loading. All operations involving a reduction in boron concentration of the Reactor Coolant System are suspended during any period that both trains are removed from operation.

Reason for Proposed Change

Fuel movements and core alterations near the vicinity of the reactor pressure vessel hot legs are difficult due to turbulence in the water. This turbulence is caused by the operation of the shutdown cooling trains. The proposed change facilitates core alterations in this area and minimizes the possibility of damage to components inside the reactor pressure vessel.

Safety Analysis

The proposed change allows both shutdown cooling trains to be removed from operation for up to one hour per eight hour period. Operation of the shutdown cooling trains for decay heat removal is not necessary for initial core loading of unirradiated fuel. Operations involving a change in the RCS boron concentration are not allowed under the footnote. To avoid the occurrence of a boron dilution event, a maximum time of one hour per eight hour period is allowed which is consistent with FSAR Section 15.4.1.4.3c and responses to NRC questions 212.124 and 212.152.

Accordingly, it is concluded that: (1) Proposed Change NPF-15-2 does not present significant hazard considerations not described or implicit in the Final Safety Analysis; (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.

NPF-15-2

Attachment A

REFUELING OPERATIONS

LOW WATER LEVEL

LIMITING CONDITION FOR OPERATION

3.9.8.2 Two independent shutdown cooling trains shall be OPERABLE and at least one shutdown cooling train shall be in operation.

APPLICABILITY: MODE 6 when the water level above the top of the reactor pressure vessel flange is less than 23 feet.

ACTION:

- a. With less than the required shutdown cooling trains OPERABLE, immediately initiate corrective action to return the required shutdown cooling trains to OPERABLE status, or to establish greater than or equal to 23 feet of water above the reactor pressure vessel flange as soon as possible.
- b. With no shutdown cooling train in operation, suspend all operations involving a reduction in boron concentration of the Reactor Coolant System and immediately initiate corrective action to return the required shutdown cooling train to operation. Close all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere within 4 hours.

SURVEILLANCE REQUIREMENTS

4.9.8.2 At least one shutdown cooling train shall be verified to be in operation and circulating reactor coolant at a flow rate of greater than or equal to 4000 gpm at least once per 12 hours.

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