

REVISED DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGES  
NPF-10-36 AND NPF-15-36

Description

The proposed change is required to clarify Engineered Safety Features Actuation System (ESFAS) response time requirements to be consistent with the FSAR Chapter 15 accident analyses and provide the maximum flexibility which can be supported by the analyses.

The following changes are made to Table 3.3-5:

1. Table 3.3-5, Item 2.a(1), Safety Injection, is revised to include a response time of 31.2 seconds for the Charging Pumps. Charging flow is required on pressurizer pressure-low (only) to augment HPSI flow for the small break LOCA. This necessitates that the charging pump response time be the same as for high pressure safety injection.
2. Table 3.3-5, item 3.b, CIAS is revised to include response time requirements for the main feedwater backup isolation valves (HV 1105, HV 1106, HV 4047, HV 4051). The main feedwater backup isolation valves are required to isolate main feedwater in the event of a main steam or feedline break inside containment concurrent with a single failure of an MFWIV. The response time requirement for the back up isolation valves is the same as that for the MFWIV's.
3. Table 3.3-5, Item 5, MSIS, is revised to clarify response time requirements which apply to individual classes of valves actuated by an MSIS. The response times listed correspond to those assumed by the accident analyses.
4. The response times for Emergency Feedwater Actuation Signal (EFAS), Tables 3.3-5 Items 8 and 9, are increased to the analyzed limits for auxiliary feedwater delivery. The analyzed response time for non-LOCA events, bounded by the loss of normal feedwater event, is 42.7 seconds. The response time for events which require AFW with SIAS are bounded by the coincident loss of normal AC power event at 53 seconds; a response time of 52.7 seconds is requested.
5. An additional surveillance requirement is added to Specification 4.7.1.2.1.a which requires verification that the AFW piping is full. This change is required to support the EFAS response time relaxation described in 4, above. The AFW lines are long enough that system transport time could result in unacceptable delivery time, if less than completely filled, even though the pumps and valves meet the revised response time requirements.

### Safety Analysis

The proposed change discussed above shall be deemed to constitute a significant hazards consideration if there is a positive finding in any of the following areas:

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change revises ESF response times, clarifies response time requirements, and institutes response time requirements for equipment credited in the accident analyses but not currently covered by the technical specifications. The revisions to the response times are within the bounds of the existing accident analyses. The additional surveillance requirement on AFW piping ensures that AFW delivery will occur within the bounds of the existing accident analyses with the revised response times. Because the proposed change is within the bounds of the existing accident analyses, there is no effect on the probability or consequences of any previously evaluated accident.

2. Will operation of the facility in accordance with this proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change revises ESF response times within the bounds of the existing accident analyses. It does not alter the configuration or operation of the plant. Therefore, the possibility of a new or different kind of accident from any previously evaluated is not created by the proposed change.

3. Will operation of the facility in accordance with this proposed amendment involve a significant reduction in a margin of safety?

Response: No

The proposed revisions of ESF response times are within the bounds of existing analysis. The analyzed consequences of design bases accidents remain unchanged. Therefore, no margins of safety are reduced by the proposed change.

The proposed clarifications and revisions to ESF response times are essentially editorial in nature. Therefore, the proposed change is similar to example (i) of amendments not likely to involve a significant hazards consideration published in 48 FR 14864 dated April 6, 1983.

Safety and Significant Hazards Determination

Based on the above Safety Analysis, it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10 CFR 50.92; and (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 Environmental Statement.

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