

TABLE 4.1-2A

## MINIMUM FREQUENCY FOR EQUIPMENT TESTS

| <u>DESCRIPTION</u>                          | <u>TEST</u>  | <u>FREQUENCY</u>   | <u>FSAR SECTION<br/>REFERENCE</u> |
|---|--|--|-----------------------------------|
| 1. Control Rod Assemblies                   | Rod drop times of all full length rods at hot conditions | Each refueling shutdown or after disassembly or maintenance requiring the breach of the Reactor Coolant System integrity | 7                                 |
| 2. Control Room Assemblies                  | Partial movement of all rods                             | Every 2 weeks  | 7                                 |
| 3. Refueling Water Chemical Addition Tank   | Functional   | Each refueling shutdown  | 6                                 |
| 4. Pressurizer Safety Valves                | Setpoint   | Each refueling shutdown  | 4                                 |
| 5. Main Steam Safety Valves                 | Setpoint   | Each refueling shutdown  | 10                                |
| 6. Containment Isolation Trip               | *Functional  | Each refueling shutdown  | 5                                 |
| 7. Refueling System Interlocks              | *Functional  | Prior to refueling   | 9.12                              |
| 8. Service Water System                     | *Functional  | Each refueling shutdown  | 9.9                               |
| 9. Fire Protection Pump and Power Supply    | Functional   | Monthly  | 9.10                              |
| 10. Primary System Leakage                  | *Evaluate  | Daily  | 4                                 |
| 11. Diesel Fuel Supply                      | *Fuel Inventory  | 5 days/week  | 8.5                               |
| 12. Boric Acid Piping Heat Tracing Circuits | *Operational   | Monthly  | 9.1                               |
| 13. Main Steam Line Trip                    | Functional<br>(1) Full closure<br>(2) Partial closure    | (1) Each cold shutdown<br>(2) Before each startup  | 10                                |

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ATTACHMENT 2

## SAFETY EVALUATION

The current requirement for verifying the rod drop time to be no more than 1.8 seconds to dashpot entry for cold conditions, after a refueling shutdown or after maintenance requiring the breach of the Reactor Coolant System integrity (Technical Specifications Table 4.1-2A), is not necessary. The assumption of a specific rod drop time at cold conditions is not incorporated into any safety analysis.

A comprehensive review of the UFSAR Chapter 14 accident analyses indicates that no transients are assumed to be mitigated by negative reactivity insertion, using control rods, unless the reactor core is at the hot, critical condition. To ensure the availability of the negative reactivity, control rod drop time verification is necessary only before the core attains criticality following reactor heatup. This requirement will be fulfilled by maintaining the Technical Specifications provision for control rod timing tests at hot shutdown. Therefore, the cold rod drop timing tests will be eliminated without compromising plant safety or any safety analysis.

This change does not adversely affect the safe operation of the plant. This change does not:

- a. Increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety, previously evaluated in the safety analysis report. The assumption of a specific rod drop time at cold conditions is not incorporated into any safety evaluation.

- b. Create a possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report. The verification of conservative rod drop times at hot conditions prior to criticality following a refueling shutdown or after maintenance requiring the breach of the Reactor Coolant System integrity shall continue to be required by the Technical Specifications.
- c. Reduce the margin to safety as defined in the basis for any Technical Specification. The assumption of a specific rod drop time at cold conditions is not incorporated into any basis for a Technical Specification.

Therefore, we conclude that this proposed change does not involve a significant hazards consideration or an unreviewed safety question.