UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. for a Class 103 License to Acquire, Possess, and Use a Utilization Facility as Part of Unit No. 2 of the San Onofre Nuclear Generating Station	)	Docket No. 50-361 Amendment Application No. 134

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 134.

This amendment application consists of Proposed Change Number (PCN)-431 to Facility Operating License No. NPF-10. PCN-431 will revise Unit 2 Technical Specification (TS) Table 2.2-1 "Reactor Protective Instrumentation Trip Setpoint Limits," Table 3.3-1, "Reactor Protective Instrumentation," Table 3.3-3, "Engineered Safety Feature Actuation System Instrumentation," and Table 3.3-4, "Engineered Safety Feature Actuation System Instrumentation Trip Values," TSs 3/4.5.2, "ECCS Subsystems - Tavg Greater Than 350°F," and 3/4.5.3, "ECCS Subsystems - Tavg Less Than 350°F," and the associated Bases for the above TSs. The proposed revision to the tables changes the pressure at which the Low Pressurizer Pressure (LPP) trip may be manually bypassed to less than 472 psia and the pressure the bypass shall be automatically removed to greater than or equal to 472 psia. This new pressure is an allowable value which includes total loop uncertainties for the instruments used in the LPP trip circuit. The proposed revision to TSs 3/4.5.2 and 3/4.5.3 changes the pressurizer pressure limit from 400 psia to 472 psia for the operability in Mode 3 of the ECCS Subsystems in both TSs.

Subscribed on this 15th day of SEPTEMBER, 1993.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Richard M. Rosenblum
Richard M. Rosenblum
Vice President

State of California
County of Orange
On 9/15/93 before me, BARBARA A. McCARTHY/NOTARY PUBLIC, personally appeared RICHARD M. ROSENBLUM, personally known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

Signature Barbara A. McCarthy

OFFICIAL SEAL
BARBARA A. MC CARTHY
Notary Public-California
ORANGE COUNTY
My Commission Expires
March 31, 1995

Tanya E. Oubre
Attorney for Southern
California Edison Company

By: Tanya Oubre/ear
Tanya E. Oubre

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. for a Class 103 License to Acquire, Possess, and Use a Utilization Facility as Part of Unit No. 3 of the San Onofre Nuclear Generating Station	)	Docket No. 50-362 Amendment Application No. 118

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 118.

This amendment application consists of Proposed Change Number (PCN)-431 to Facility Operating License No. NPF-15. PCN-431 will revise Unit 3 Technical Specification (TS) Table 2.2-1 "Reactor Protective Instrumentation Trip Setpoint Limits," Table 3.3-1, "Reactor Protective Instrumentation," Table 3.3-3, "Engineered Safety Feature Actuation System Instrumentation," and Table 3.3-4, "Engineered Safety Feature Actuation System Instrumentation Trip Values," TSs 3/4.5.2, "ECCS Subsystems - Tavg Greater Than 350°F," and 3/4.5.3, "ECCS Subsystems - Tavg Less Than 350°F," and their associated Bases. The proposed revision to the tables changes the pressure at which the Low Pressurizer Pressure (LPP) trip may be manually bypassed to less than 472 psia and the pressure the bypass shall be automatically removed to greater than or equal to 472 psia. This new pressure is an allowable value which includes total loop uncertainties of the instruments used in the LPP trip circuit. The proposed revision to TSs 3/4.5.2 and 3/4.5.3 changes the pressurizer pressure limit from 400 psia to 472 psia for the operability in Mode 3 of the ECCS Subsystems in both TSs.

Subscribed on this 15th day of SEPTEMBER, 1993.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: _____
Richard M. Rosenblum
Vice President

State of California
County of Orange
On 9/15/93 before me, BARBARA A. McCARTHY/NOTARY PUBLIC, personally appeared RICHARD M. ROSENBLUM, personally known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

Signature Barbara A. McCarthy

OFFICIAL SEAL
BARBARA A. MC CARTHY
Notary Public-California
ORANGE COUNTY
My Commission Expires
March 31, 1995

Tanya E. Oubre
Attorney for Southern
California Edison Company

By: Tanya Oubre/BAM
Tanya E. Oubre

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-10/15-431

This is a request to revise Technical Specification (TS) Table 2.2-1, "Reactor Protective Instrumentation Trip Setpoint Limits," Table 3.3.1, "Reactor Protective Instrumentation," Table 3.3-3, "Engineered Safety Feature Actuation System Instrumentation," and Table 3.3-4, "Engineered Safety Feature Actuation System Instrumentation Trip Values," TSs 3/4.5.2, "ECCS Subsystems - Tavg Greater Than 350°F," and 3/4.5.3, "ECCS Subsystems - Tavg Less Than 350°F," and their associated Bases for San Onofre Nuclear Generating Station Units 2 and 3.

Existing Specifications

Attachment A - Existing Specifications, Unit 2
Attachment B - Existing Specifications, Unit 3

Proposed Specifications

Attachment C - Proposed Specifications, Unit 2
Attachment D - Proposed Specifications, Unit 3

DESCRIPTION

The following changes are proposed for Table 2.2-1, "Reactor Protective Instrumentation Trip Setpoint Limits;" the Bases for TS 2.2.1; Tables 3.3-1, "Reactor Protective Instrumentation," 3.3-3, "Engineered Safety Feature Actuation System Instrumentation," and 3.3-4, "Engineered Safety Feature Actuation System Instrumentation Trip Values;" the Bases for TSs 3/4.3.1 and 3/4.3.2; and, TSs 3/4.5.1 and 3/4.5.2 and their associated Bases:

1. Change "400 psia" to "472 psia" in the third sentence of Note (2), Table 2.2-1. Change "500 psia" to "472 psia" in the last sentence of the same table. These changes account for instrument total loop uncertainties and ensure the analytical limit of 500 psia will not be exceeded.

2. Add to the Bases for TS 2.2.1: "The low pressurizer pressure trip may be manually bypassed below 472 psia; bypass shall be automatically removed whenever pressurizer pressure is greater than or equal to 472 psia. The 472 psia value is an allowable value which includes instrument total loop uncertainties and ensures the 500 psia analytical limit will not be exceeded." These provisions are also identified in Specification 3/4.3.1, 3/4.3.2, 3/4.5.2, and 3/4.5.3." This change will ensure any changes affecting any one of the identified TSs and associated Bases will be consistently applied to any or all of these TSs, as appropriate. This change also provides the basis for the new 472 psia value.

3. Change "400 psia" to "472 psia" in the first and second sentences of Note (b), Table 3.3-1. This change in pressure is consistent with and made for the same reason as the change made in Table 2.2-1 above.

4. Change "400 psia" to "472 psia" in the first and second sentences of Note (a), Table 3.3-3. This change is consistent with and made for the same reason as the changes made in Tables 2.2-1 and 3.3-1 above.

5. Change "400 psia" to "472 psia" in the third and last sentence of Note (1), Table 3.3-4. This change is consistent with and made for the same reason as the changes made in Tables 2.2-1, 3.3-1 and 3.3-3 above.

6. Add to the Bases for TSs 3/4.3.1 and 3/4.3.2: "The low pressurizer pressure trip may be manually bypassed below 472 psia; bypass shall be automatically removed whenever pressurizer pressure is greater than or equal to 472 psia. The 472 psia value is an allowable value which includes instrument total loop uncertainties and ensures the 500 psia analytical limit will not be exceeded. These provisions are also identified in Specification 2.2.1, 3/4.5.2, and 3/4.5.3." This change will ensure any changes affecting any one of the identified TSs will be consistently applied to any or all of these TSs, as appropriate. This change also provides the basis for the new 472 psia value.

7. Change footnote "* With pressurizer pressure greater than or equal to 400 psia" in TS 3/4.5.2 to "* With pressurizer pressure greater than or equal to 472 psia." This change is consistent with the proposed change in Tables 2.2-1, 3.3-1, 3.3-3, 3.3-4, and TS 3/4.5.3.

8. Change the footnote "* With pressurizer pressure less than 400 psia" in TS 3/4.5.3 to "* With pressurizer pressure less than 472 psia." This change is consistent with the proposed change in Tables 2.2-1, 3.3-1, 3.3-3, 3.3-4, and TS 3/4.5.2.

9. Add to the Bases for TSs 3/4.5.2 and 3/4.5.3: "The low pressurizer pressure trip may be manually bypassed below 472 psia; bypass shall be automatically removed whenever pressurizer pressure is greater than or equal to 472 psia. The 472 psia value is an allowable value which includes instrument total loop uncertainties and ensures the 500 psia analytical limit will not be exceeded. These provisions are also identified in Specification 2.2.1, 3/4.3.1, and 3/4.3.2." This change will ensure any changes affecting any one of the identified TSs will be consistently applied to any or all of these TSs, as appropriate. This change also provides the basis for the new 472 psia value.

DISCUSSION

The existing Note (2) of Table 2.2-1, in part, states that the Low Pressurizer Pressure (LPP) trip may be manually bypassed below 400 psia and that the bypass shall be automatically removed whenever pressurizer pressure is greater than or equal to 500 psia. Note (b) of Table 3.3-1, Note (a) of Table 3.3-3, and Note (1) of Table 3.3-4, in part, state that the LPP trip maybe manually bypassed below 400 psia and that the bypass shall be automatically removed whenever pressurizer pressure is greater than or equal to 400 psia. As noted, there is an inconsistency in the existing tables associated with the pressure at which the automatic removal of the LPP trip becomes effective.

The proposed change revises the existing notes in the above tables by changing the pressure at which the LPP trip may be manually bypassed to below 472 psia and the pressure at which automatic removal of the LPP trip bypass becomes effective to greater than or equal to 472 psia. The proposed change also revises 1) the existing footnotes in TSs 3/4.5.2 and 3/4.5.3, which provide a 400 psia pressurizer pressure limit for the Mode 3 applicability of the Emergency Core Cooling System (ECCS)in these TSs, to 472 psia to be consistent with the change in the TS tables and 2) the Bases for the above TSs. The new value of 472 psia is an allowable value which includes total loop uncertainties for the instruments used in the LPP trip circuit and ensures the analytical limit of 500 psia will not be exceeded. The actual setpoints for the automatic removal of the LPP trip bypass and the bypass enable are as specified in SCE Calculation J-SBA-033, "Pressurizer Low Pressure Trip Bypass." The nominal setpoint is 450 psia for the automatic removal of the trip bypass and due to a fixed hysteresis of approximately 75 psi on the instruments used in the LPP trip circuit the bypass enable setpoint is approximately 375 psia.

One of the functions of the Reactor Protection System (RPS) is to initiate a reactor trip whenever the pressurizer pressure falls below the trip setpoint. The Engineered Safety Feature Actuation System (ESFAS) instrumentation initiates safety injection whenever the pressurizer pressure falls below the safety injection setpoint. The reactor trip and the safety injection actuation functions are provided to mitigate the consequences of an accident such as a Steam Line Break (SLB) or a Loss of Coolant Accident (LOCA). The LPP trip setpoint may be decreased in a manner prescribed by the TSs. Bypass of the LPP trip and actuation of safety injection, namely RPS/ESFAS bypass, is provided to allow for systems testing at low pressure and to allow heatup and cooldown without generating an undesired safeguard action. This bypass may be manually initiated when pressurizer pressure drops below the bypass permissive setpoint and is automatically removed when pressurizer pressure rises above the bypass permissive setpoint.

The RPS instrumentation and the ESFAS instrumentation are required to satisfy paragraph 50.55a(h) of 10 CFR 50, Criteria for Protection Systems for Nuclear Power Generating Stations (IEEE Standard 279), and General Design Criteria (GDC) 20, "Protection system functions," of Appendix A to 10 CFR 50. GDC 20 states that the protection system shall be designed to 1) initiate automatically the operation of appropriate systems including reactivity control systems, to assure that specified fuel design limits are not exceeded as a result of operational occurrences, and 2) sense accident conditions and to initiate the operation of systems and components important to safety. Section 4.1, "General Function Requirements," of IEEE Standard 279 in part requires that the protection system shall, with precision and reliability, automatically initiate action for the range of conditions and performance enumerated in Section 3 of the standard. It also states that automatic initiation is a requirement.

The main function of the ECCS is to provide core cooling and negative reactivity to ensure that the reactor core is protected during postulated accidents such as a LOCA or Main Steam Line Break (MSLB). In Modes 1, 2, and 3 with Tavg greater than 350°F, TS 3/4.5.2 requires two separate and independent ECCS subsystems to be operable to ensure 100% of the core cooling

requirements can be provided in the event of a single active failure. The applicability in Mode 3 for TS 3/4.5.2 with Tavg greater than 350°F is currently limited to pressurizer pressure greater than or equal to 400 psia. This limit is changed to greater than or equal to 472 psia to be consistent with the proposed change to the above tables. In Modes 3 and 4 with Tavg less than 350°F, TS 3/4.5.3 requires one ECCS subsystem to be operable without single failure consideration on the basis of the stable reactivity condition of the reactor and the limited core cooling requirements. The applicability in Mode 3 for TS 3/4.5.3 with Tavg less than 350°F is currently limited to a pressurizer pressure less than 400 psia. This limit is changed to less than 472 psia to be consistent with the proposed change to the above tables.

Due to the proposed TS changes, the appropriate sections of the Updated Final Safety Analysis Report (UFSAR) will be revised to incorporate the changes. These sections include Sections 7.2.1.1.1.6, "Low Pressurizer Pressure," 7.2.1.1.5, "Bypasses," Table 7.2-2, "Reactor Protective System Bypasses," Table 7.2-7, "Plant Protection System Failure Mode and Effects Analysis," 7.3.1.1.1, "Safety Injection System," and Table 7.3-4, "ESFAS Bypasses."

Basis for and Acceptability of the Request

This proposed change is necessary to 1) avoid an impact on the Unit 3 Cycle 7 refueling outage schedule due to a delay in depressurization of the Reactor Coolant System (RCS) afforded by the existing TSs, 2) incorporate the new values for the automatic removal of the LPP trip bypass and the trip bypass enable based upon the revised LPP setpoint calculations, and 3) eliminate the inconsistencies in the existing TSs which are associated with the pressure at which automatic removal of the LPP trip bypass becomes effective.

During plant cooldowns (beginning at approximately 2000 psia) the LPP trip setpoint is manually decreased to maintain a 400 psi margin below the existing pressurizer pressure, to a minimum value of 300 psia. This maintains the capability to automatically actuate the Safety Injection Actuation Signal (SIAS) if required during plant cooldowns. To allow continued plant depressurization during cooldown without undesired actuation of the SIAS, a manual bypass of SIAS on LPP is provided. The current TS permits SIAS to be manually bypassed below 400 psia. However, due to an approximate 75 psi hysteresis on the instruments used in the LPP enable circuit, the operator will be unable to manually bypass the SIAS until the pressurizer pressure is about 325 psia. Allowing the pressure to go this low before bypassing SIAS would risk an inadvertent SIAS actuation because only a 25 psia margin exists between the floor LPP trip setpoint (300 psia) and the SIAS manual bypass on LPP (325 psia).

With the current SIAS bypass enable setpoint of 325 psia, SCE will be taking procedural actions to preclude an inadvertent SIAS during shutdowns in either Unit 2 or 3. These procedural actions will involve increasing the margin between the SIAS bypass enable and the floor LPP trip by resetting the SIAS bypass enable to a higher setpoint once the unit has been cooled down to Mode 4 (temperature below 350°F) but before pressure is reduced below about 500 psia. The reset of the SIAS bypass to a higher setpoint is acceptable because the LPP trip is not required to be operable in Mode 4. This reset requires

Instrument & Control technicians to bypass each Plant Protection System (PPS) channel, one at a time, and adjust the appropriate bistable to a higher value. This evolution adds time and results in a delay in depressurizing the Reactor Coolant System (RCS) and going on shutdown cooling operations.

The delay in RCS depressurization and cooldown creates an impact on the Unit 3 Cycle 7 refueling outage schedule. In addition, this delay complicates the response to any emergency shutdown. Revising the TSs to increase the LPP trip bypass enable from less than 400 to less than 472 psia and the automatic removal of the bypass from greater than or equal to 400 psia to greater than or equal to 472 psia will avoid this delay.

The proposed change is based on the results of 1) a Combustion Engineering (CE) evaluation of the potentially affected accidents (steam line break and LOCA) occurring in Mode 3 at a pressure of 500 psia and 2) the revised LPP setpoint calculations. The total positive reactivity that would be added as a result of a steam line break at 500 psia is 4.3% $\Delta\rho$ when compared to 3.9% $\Delta\rho$ that would be added if a steam line break were to occur at 400 psia. Since the Technical Specification requirement for Mode 3 shutdown margin is 5.15% $\Delta\rho$, a sufficient margin exists to preclude a return to criticality due to a steam line break occurring at 500 psia. The new allowable value of 472 psia, which includes instrument uncertainties based on the revised LPP setpoint calculations, will continue to ensure the analytical limit of 500 psia is not exceeded.

Also, there is no change to plant hardware and analysis methods, and the RPS/ESFAS systems are still required to satisfy the same acceptance criteria as before.

SAFETY ANALYSIS

The proposed change described above shall be deemed to involve a significant hazards consideration if there is a positive finding in any one 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 accidents that may be affected by the proposed change are the Steam Line Break (SLB) and a Loss of Coolant Accident (LOCA). The Reactor Protection System/Engineered Safety Feature Actuation System (RPS/ESFAS) bypass, if in effect, would not initiate a reactor trip and safety injection actuation on low pressurizer pressure to mitigate the consequences of a SLB or a LOCA occurring at these conditions. The consequences of an unmitigated accident will be the potential for return to criticality and subsequent approach to the specified acceptable fuel design limits and the potential for exceeding Emergency Core Cooling System (ECCS) acceptance criteria. The higher value (472 psia as opposed to 400 psia) at which automatic removal of Low Pressurizer

Pressure (LPP) trip manual bypass becomes effective is justified based on the results of an evaluation of the limiting SLB and LOCA events occurring in Mode 3 at a pressurizer pressure of 500 psia and the revised setpoint calculations.

A main SLB outside containment initiated at 500 psia does not require an automatic Safety Injection Actuation Signal (SIAS) to mitigate the consequences of the event. At a Reactor Coolant System (RCS) pressure of 500 psia, the maximum RCS temperature would be less than 467°F (saturation temperature at 500 psia). In the event of an SLB from this condition, the total positive reactivity that would be added would be approximately 4.3% $\Delta\rho$ as compared to 3.9% $\Delta\rho$ that would be added if an SLB were to occur at 400 psia. This 4.3% $\Delta\rho$ reactivity is the sum of Doppler and moderator reactivity additions and includes uncertainties.

This reactivity addition represents an RCS cooldown from 467°F to 212°F, at which point the cooldown from the SLB has already stopped since the Steam Generator (SG) water temperature is below the boiling point. For this case, the shutdown margin required by the Technical Specification (TS) in Mode 3 is 5.15% $\Delta\rho$. Therefore, the shutdown margin is more than sufficient to offset the reactivity insertion due to an SLB at 500 psia and preclude a return to criticality. The allowable value of 472 psia includes instrument uncertainties and will continue to ensure the analytical limit of 500 psia is not exceeded.

A main SLB inside containment or a LOCA would result in automatic SIAS generated by the ESFAS high containment pressure signal. The high containment pressure actuation of SIAS is maintained during all modes of plant operation. The high containment pressure SIAS setpoint trip is 3.4 psig (3.7 psig allowable value). As indicated above, an SLB initiated at 500 psia does not require automatic SIAS to mitigate the consequences of the event. However, automatic SIAS on high containment pressure would occur for all but the smallest SLB to provide mitigation for the SLB inside containment.

The consequences of a LOCA are not sensitive to the initial RCS pressure assumed (either 400 psia, 472 psia, or 500 psia). At 3.4 psig containment pressure, SIAS would actuate the safety injection (SI) equipment that is required to be operable by the TSs to mitigate the event. Containment pressure following a LOCA, and hence the time the high containment pressure setpoint is reached is not sensitive to the initial pressure. Automatic SIAS on high containment pressure would be expected for all LOCAs except for very small break LOCAs at the small end of the break spectrum. Containment analysis of the smallest break (0.01 ft^2) in the Updated Final Safety Analysis Report (UFSAR) indicates that automatic SIAS actuation on high containment pressure would occur prior to core uncovery. For smaller break sizes, for which a containment high pressure signal may not be generated, the time available would be sufficient to credit manual SIAS initiation to mitigate the event.

The probability of occurrence of a LOCA in Mode 3 or Mode 4 is lower than that in Mode 1. Analysis of Mode 3 or Mode 4 LOCA is not performed as part of the UFSAR and is not required to comply with ECCS performance criteria. However, the TSs require RPS/ESFAS instrumentation and Engineered Safety Feature equipment to be operable in Modes 3 and 4 to mitigate the event should it occur. The requirement for automatic SIAS initiated by two diverse signals (low pressurizer pressure and high containment pressure) over a wide range of plant operating modes ensures the capability to automatically actuate the SIAS if required during plant startup and shutdown. The consequences of a credible size LOCA in Modes 3 or 4, with the safety injection equipment required by the TSs operable and with automatic SIAS on high containment pressure or manual SIAS for very small LOCAs, has been evaluated to be acceptable based on Nuclear Steam Supply System vendor study. Therefore, there is no significant increase in probability or consequences associated with an increase in the LPP trip bypass automatic removal from 400 psia to 472 psia.

The proposed change revises the footnote on mode applicability in TSs 3/4.5.2 and TS 3/4.5.3 to be consistent with the change in pressure for the automatic removal of the LPP trip bypass. Proposed TS 3/4.5.2 specifies the ECCS subsystems required to be operable in Modes 1, 2, and 3 (with pressurizer pressure greater than or equal to 472 psia). Proposed TS 3/4.5.3 specifies the ECCS subsystems required to be operable in Mode 3 (with pressurizer pressure less than 472 psia), and in Mode 4. The ECCS subsystems which are required to be operable when the LPP reactor trip and SIAS are in bypass are those specified in TS 3/4.5.3. The ECCS subsystems required to be operable in Mode 3 up to 400 psia under the existing TS 3/4.5.3 when the bypass is in effect are the same as those required to be operable under the proposed TS 3/4.5.3. Therefore, there is no difference in the SI equipment actuated if the LOCA is initiated at 400 psia or 472 psia.

Therefore, operation of the facility in accordance with this proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No

There is no possibility of a new or different accident occurring as a result of this proposed change because the operator is still required to manually enable and manually remove the LPP bypass in the event the automatic removal function fails. The automatic removal of the LPP trip bypass provides additional safeguard when the pressurizer pressure exceeds 472 psia. Therefore, operation of the facility in accordance with this proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   Response: No

   This proposed change does not significantly change the margin of safety since the same operator action to ensure operability of the LPP trip bypass function is still required. The feature of automatic removal of the LPP trip manual bypass will maintain the existing margin of safety because the evaluation of potentially affected accidents indicates that the acceptance criteria for the events continue to be met at the increased value (472 psia) of the LPP trip bypass automatic removal. The new allowable value, based on the explicit determination of instrument uncertainties in the revised LPP setpoint calculations, will continue to ensure the 500 psia analytical limit for automatic removal of the LPP trip bypass will not be exceeded.

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. Moreover, because this action does not involve a significant hazards consideration, it will also not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.