

ATTACHMENT A

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REACTOR COOLANT SYSTEM

ACTION (Continued)

- b) Place the following reactor trip system channels, associated with the loop not in operation, in their tripped conditions: #
 - 1. Overpower ΔT channel
 - 2. Overtemperature ΔT channel
 - c) Change the P-8 interlock setpoint from the value specified in Table 3.3-1 to:
 - $\leq 71\%$ of RATED THERMAL POWER when the reactor coolant stop valves in the nonoperating loop are closed.
 - d) Periodic surveillance testing of the instrumentation on the isolated loop is not required while the loop remains isolated.
2. THERMAL POWER is restricted to:
- $\leq 66\%$ of RATED THERMAL POWER when the reactor coolant stop valves in the nonoperating loop are closed.
- b. With one reactor coolant loop and associated pump not in operation, subsequent STARTUP and POWER OPERATION at or below 31% of RATED THERMAL POWER may proceed provided the following reactor trip system channels, associated with the loop not in operation, have been placed in their tripped conditions with the reactor subcritical: #
- 1. Overpower ΔT channel
 - 2. Overtemperature ΔT channel

These channels may be placed in the bypass condition for up to 8 hours during surveillance testing of the overpower and overtemperature ΔT channels of the active loops.

ATTACHMENT B

Safety Evaluation

Proposed Change Request No. 35 Revision 1 amends our previous submittal dated October 27, 1978 concerning N-1 loop Technical Specifications.

Description and Purpose of Change

During a technical specification review, it was determined that specification 3.4.1.1 does not address operation between the P-7 and P-8 power levels for N-1 loop operation. Overpower delta T and over-temperature delta T protection must be provided at all times for power levels above P-7. An overpower or over-temperature delta T signal in two out of three loops, during N-loop operation, will cause a reactor trip, thus, if detection fails in one loop, the other two loops will provide 2/3 logic protection. However, in N-1 loop conditions, the isolated loop will not generate a signal and if detection in one of the active loops fails, the 2/3 logic would be defeated since only 1/3 signals would be available. Therefore, to provide the protection necessary during N-1 loop operation, the isolated loop overpower and over-temperature delta T channels must be tripped when operating between the P-7 and P-8 power levels.

In response to the concerns addressed above, Action statement a.2.b has been incorporated into specification 3.4.1.1 to provide the necessary reactor protection system requirements for N-1 loop operation.

Basis

1. Is the probability of an occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the UFSAR increased? No

Reason:

The proposed change reflects the UFSAR requirements for N-1 loop operation. The Technical Specifications will require the operator to place the isolated loop reactor trip bistables in the tripped condition. The change provides for N-1 loop operation reactor trip protection and is consistent with UFSAR Section 7.2, Reactor Trip System and Figure 7.2-1, Sheet 5 Logic Diagram.

2. Is the probability for an accident or malfunction of a different type than previously evaluated in the UFSAR created? No

Reason:

The UFSAR Section 14 does not address N-1 loop operation for all probable accidents, our previous submittals included the additional accident analysis applicable to N-1 loop operation. The accident

analysis required to complete the Section 14 analysis for N-1 loop operation will be incorporated into the UFSAR following approval of the N-1 technical specification change. The N-1 loop accident analyses conclude that in the event of an accident, the plant limiting parameters are maintained within acceptable limits. This proposed technical specification change reflects the assumption used in the accident analyses, that the isolated loop reactor trip system bistables are tripped prior to plant operation in an N-1 loop configuration.

3. Is the margin of safety as defined in the basis for any Technical Specification reduced? No.

Reason:

The technical specification bases adequately address N-1 loop operation. Since this proposed change is being made to reflect assumptions used in the N-1 analyses, the margin of safety as defined in the Technical Specification bases will not be reduced.

4. Based on the above, is an unreviewed safety question involved? No.

Conclusion

The proposed change reflects the assumptions used in the UFSAR system description and accident analysis for N-1 loop operation. This change does not involve physical change to plant safety related systems, components or structures, will not increase the consequences of an accident previously analyzed nor create the possibility of a malfunction different than previously evaluated in the UFSAR. Therefore, it is concluded that, since the change does not involve an unreviewed safety question in accordance with 10CFR50.59, the proposed change does not constitute a significant hazards consideration.

Based on the consideration above, the proposed change has been determined to be safe and does not involve an unreviewed safety question.