

REACTIVITY CONTROL SYSTEMS

BORATION SYSTEMS

BORATED WATER SOURCES - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.1.2.5 As a minimum, one of the following borated water sources shall be OPERABLE:

- a. A Boric Acid Storage System with:
 - 1) A minimum contained borated water volume of 6,500 gallons,
 - 2) A minimum boron concentration of 7000 ppm, and
 - 3) A minimum solution temperature of 65°F.
- b. The refueling water storage tank (RWST) with:
 - 1) A minimum contained borated water volume of 24,500 gallons,
 - 2) A minimum boron concentration of ~~2000~~ ²⁷⁰⁰ ppm, and
 - 3) A minimum solution temperature of 50°F.

APPLICABILITY: MODES 5 and 6.

ACTION:

With no borated water source OPERABLE, suspend all operations involving CORE ALTERATIONS or positive reactivity changes.

SURVEILLANCE REQUIREMENTS

4.1.2.5 The above required borated water source shall be demonstrated OPERABLE:

- a. At least once per 7 days by:
 - 1) Verifying the boron concentration of the water,
 - 2) Verifying the contained borated water volume, and
 - 3) Verifying the boric acid storage tank solution temperature when it is the source of borated water.
- b. At least once per 24 hours by verifying the RWST temperature.

REACTIVITY CONTROL SYSTEMS

BORATION SYSTEMS

BORATED WATER SOURCES - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.6 As a minimum, the following borated water sources shall be OPERABLE as required by Specification 3.1.2.2:

- a. A Boric Acid Storage System with:
 - 1) A minimum contained borated water volume of 22,000 gallons,
 - 2) A minimum boron concentration of 7000 ppm, and
 - 3) A minimum solution temperature of 65°F.
- b. The refueling water storage tank (RWST) with:
 - 1) A minimum contained borated water volume of 477,000 gallons,
 - 2) A ~~minimum~~ boron concentration between 2700 and 2900 ppm,
 - 3) A minimum solution temperature of 50°F, and
 - 4) A maximum solution temperature of 98°F.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With the Boric Acid Storage System inoperable and being used as one of the above required borated water sources, restore the system to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and borated to a SHUTDOWN MARGIN equivalent to at least the limit specified in the CORE OPERATING LIMITS REPORTS (COLR) for the above MODES at 200°F; restore the Boric Acid Storage System to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.
- b. With the RWST inoperable, restore the tank to OPERABLE status within 1 hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

3/4.5 EMERGENCY CORE COOLING SYSTEMS

3/4.5.1 ACCUMULATORS

HOT STANDBY, STARTUP, AND POWER OPERATION

LIMITING CONDITION FOR OPERATION

3.5.1.1 Each Reactor Coolant System (RCS) accumulator shall be OPERABLE with:

- a. The isolation valve open and power removed,
- b. A contained borated water volume of between 6121 and 6596 gallons,
- c. A boron concentration of between ~~4900~~ ²⁶⁰⁰ and ~~2100~~ ²⁹⁰⁰ ppm, and
- d. A nitrogen cover-pressure of between 585 and 664 psig.

APPLICABILITY: MODES 1, 2, and 3*.

ACTION:

- a. With one accumulator inoperable, except as a result of a closed isolation valve, restore the inoperable accumulator to OPERABLE status within 8 hours or be in at least HOT STANDBY within the next 6 hours and reduce pressurizer pressure to less than 1000 psig within the following 6 hours.
- b. With one accumulator inoperable due to the isolation valve being closed, either immediately open the isolation valve or be in at least HOT STANDBY within 6 hours and reduce pressurizer pressure to less than 1000 psig within the following 6 hours.
- c. With one pressure or water level channel inoperable per accumulator, return the inoperable channel to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- d. With two pressure channels or two water level channels inoperable per accumulator, immediately declare the affected accumulator(s) inoperable.

SURVEILLANCE REQUIREMENTS

4.5.1.1 Each accumulator shall be demonstrated OPERABLE:

- a. At least once per 24 hours by:
 - 1) Verifying the contained borated water volume and nitrogen cover-pressure in the tanks, and

*Pressurizer pressure above 1000 psig.

BORON INJECTION SYSTEM

3/4.5.4 REFUELING WATER STORAGE TANK

LIMITING CONDITION FOR OPERATION

3.5.4 The refueling water storage tank (RWST) shall be OPERABLE with:

- a. A minimum contained borated water volume of 477,000 gallons,
- b. A minimum boron concentration between 2700 and 2900 ~~of 2000~~ ppm of boron,
- c. A minimum solution temperature of 50°F, and
- d. A maximum solution temperature of 98°F.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With the RWST inoperable, restore the tank to OPERABLE status within 1 hour or be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.5.4 The RWST shall be demonstrated OPERABLE:

- a. At least once per 7 days by:
 - 1) Verifying the contained borated water volume in the tank, and
 - 2) Verifying the boron concentration of the water.
- b. At least once per 24 hours by verifying the RWST temperature.

REACTIVITY CONTROL SYSTEMS

BASES

BORATION CONTROL

3/4.1.1.3 MODERATOR TEMPERATURE COEFFICIENT (Continued)

The surveillance requirements for measurement of the MTC at the beginning and near the end of the fuel cycle are adequate to confirm that the MTC remains within its limits since this coefficient changes slowly due principally to the reduction in RCS boron concentration associated with fuel burnup.

Prior to initial operation above 5% RATED THERMAL POWER after each fuel loading, the MTC is measured as required by Surveillance Requirement 4.1.1.3.a. A measurement bias is derived from the difference between test measurement and test prediction. All predicted values of MTC for the cycle are conservatively corrected based on measurement bias. The corrected predictions are then compared to the maximum upper limit of Technical Specification 3.1.1.3. Control rod withdrawal limits are established, if required, to assure all corrected values of predicted MTC will be less positive than the maximum upper limit required by Technical Specification 3.1.1.3.

3/4.1.1.4 MINIMUM TEMPERATURE FOR CRITICALITY

This specification ensures that the reactor will not be made critical with the Reactor Coolant System average temperature less than 551° F. This limitation is required to ensure: (1) the moderator temperature coefficient is within its analyzed temperature range, (2) the trip instrumentation is within its normal operating range, (3) the pressurizer is capable of being in an OPERABLE status with a steam bubble, and (4) the reactor vessel is above its minimum RT_{MDT} temperature.

3/4.1.2 BORATION SYSTEMS

The Boron Injection System ensures that negative reactivity control is available during each mode of facility operation. The components required to perform this function include: (1) borated water sources, (2) charging pumps, (3) separate flow paths, (4) boric acid transfer pumps, and (5) an emergency power supply from OPERABLE diesel generators.

With the RCS in MODES 1, 2, or 3, a minimum of two boron injection flow paths are required to ensure single functional capability in the event an assumed failure renders one of the flow paths inoperable. The boration capability of either flow path is sufficient to provide a SHUTDOWN MARGIN as specified in the CORE OPERATING LIMITS REPORT from expected operating conditions after xenon decay and cooldown to 200° F. The maximum expected boron capability requirement occurs at EOL from full power equilibrium xenon conditions and requires 22,000 gallons of 7000 ppm borated water from the boric acid storage tanks or a minimum contained volume of 477,000 gallons of 2000 ppm borated water from the refueling water storage tank (RWST).

The limitation for a maximum of one centrifugal charging pump to be OPERABLE and the Surveillance Requirement to verify all charging pumps except the required OPERABLE pump to be inoperable in MODES 4, 5, and 6 provides assurance that a mass addition pressure transient can be relieved by operation of a single PORV or an RHR suction relief valve.

As a result of this, only one boron injection system is available. This is acceptable on the basis of the stable reactivity condition of the reactor, the emergency power supply requirement for the OPERABLE charging pump and the additional restrictions prohibiting CORE ALTERATIONS and positive reactivity changes in the event the single injection system becomes inoperable.

REACTIVITY CONTROL SYSTEMS

BASES

3/4.1.2 BORATION SYSTEMS (Continued)

The boron capability required below 200°F is sufficient to provide a SHUTDOWN MARGIN as specified in the CORE OPERATING LIMITS REPORT after xenon decay and cooldown from 200° F to 140° F. This condition requires a minimum contained volume of 6500 gallons of 7000 ppm borated water from the boric acid storage tanks or a minimum contained volume of 24,500 gallons of ~~2000~~ ppm borated water from the RWST.

→ 2700

The contained water volume limits include allowance for water not available because of discharge line location and other physical characteristics.

The limits on contained water volume and boron concentration of the RWST also ensure a pH value of between 8.5 and 11.0 for the solution recirculated within containment after a LOCA. This pH band minimizes the evolution of iodine and minimizes the effect of chloride and caustic stress corrosion on mechanical systems and components.

The OPERABILITY of one Boron Injection System during REFUELING ensures that this system is available for reactivity control while in MODE 6.

The limitations on OPERABILITY of isolation provisions for the Boron Thermal Regeneration System and the Reactor Water Makeup System in Modes 3, 4, 5, and 6 ensure that the boron dilution flow rates cannot exceed the value assumed in the transient analysis.

3/4.1.3 MOVABLE CONTROL ASSEMBLIES

The specifications of this section ensure that: (1) acceptable power distribution limits are maintained, (2) the minimum SHUTDOWN MARGIN is maintained, and (3) the potential effects of rod misalignment on associated accident analyses are limited. OPERABILITY of the control rod position indicators is required to determine control rod positions and thereby ensure compliance with the control rod alignment and insertion limits. Verification that the Digital Rod Position Indicator agrees with the demanded position within ± 12 steps at 24, 48, 120, and 228 steps withdrawn for the Control Banks and 18, 210, and 228 steps withdrawn for the Shutdown Banks provides assurances that the Digital Rod Position Indicator is operating correctly over the full range of indication. Since the Digital Rod Position Indication System does not indicate the actual shutdown rod position between 18 steps and 210 steps, only points in the indicated ranges are picked for verification of agreement with demanded position.

The ACTION statements which permit limited variations from the basic requirements are accompanied by additional restrictions which ensure that the original design criteria are met. Misalignment of a rod requires measurement of peaking factors and a restriction in THERMAL POWER. These restrictions provide assurance of fuel rod integrity during continued operation. In addition, those safety analyses affected by a misaligned rod are reevaluated to confirm that the results remain valid during future operation.

III. Retype of Proposed Changes

See attached retype of proposed changes to Technical Specifications. The attached retype reflects the currently issued version of Technical Specifications. Pending Technical Specification changes or Technical Specification changes issued subsequent to this submittal are not reflected in the enclosed retype. The enclosed retype should be checked for continuity with Technical Specifications prior to issuance.

REACTIVITY CONTROL SYSTEMS

BORATION SYSTEMS

BORATED WATER SOURCES - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.1.2.5 As a minimum, one of the following borated water sources shall be OPERABLE:

- a. A Boric Acid Storage System with:
 - 1) A minimum contained borated water volume of 6,500 gallons,
 - 2) A minimum boron concentration of 7000 ppm, and
 - 3) A minimum solution temperature of 65°F.
- b. The refueling water storage tank (RWST) with:
 - 1) A minimum contained borated water volume of 24,500 gallons,
 - 2) A minimum boron concentration of 2700 ppm, and
 - 3) A minimum solution temperature of 50°F.

APPLICABILITY: MODES 5 and 6.

ACTION:

With no borated water source OPERABLE, suspend all operations involving CORE ALTERATIONS or positive reactivity changes.

SURVEILLANCE REQUIREMENTS

4.1.2.5 The above required borated water source shall be demonstrated OPERABLE:

- a. At least once per 7 days by:
 - 1) Verifying the boron concentration of the water,
 - 2) Verifying the contained borated water volume, and
 - 3) Verifying the boric acid storage tank solution temperature when it is the source of borated water.
- b. At least once per 24 hours by verifying the RWST temperature.

REACTIVITY CONTROL SYSTEMS

BORATION SYSTEMS

BORATED WATER SOURCES - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.6 As a minimum, the following borated water sources shall be OPERABLE as required by Specification 3.1.2.2:

- a. A Boric Acid Storage System with:
 - 1) A minimum contained borated water volume of 22,000 gallons.
 - 2) A minimum boron concentration of 7000 ppm, and
 - 3) A minimum solution temperature of 65°F.
- b. The refueling water storage tank (RWST) with:
 - 1) A minimum contained borated water volume of 477,000 gallons.
 - 2) A boron concentration between 2700 and 2900 ppm,
 - 3) A minimum solution temperature of 50°F, and
 - 4) A maximum solution temperature of 98°F.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

- a. With the Boric Acid Storage System inoperable and being used as one of the above required borated water sources, restore the system to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and borated to a SHUTDOWN MARGIN equivalent to at least the limit specified in the CORE OPERATING LIMITS REPORT (COLR) for the above MODES at 200°F; restore the Boric Acid Storage System to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.
- b. With the RWST inoperable, restore the tank to OPERABLE status within 1 hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

3/4.5 EMERGENCY CORE COOLING SYSTEMS

3/4.5.1 ACCUMULATORS

HOT STANDBY, STARTUP, AND POWER OPERATION

LIMITING CONDITION FOR OPERATION

3.5.1.1 Each Reactor Coolant System (RCS) accumulator shall be OPERABLE with:

- a. The isolation valve open and power removed.
- b. A contained borated water volume of between 6121 and 6596 gallons.
- c. A boron concentration of between 2600 and 2900 ppm, and
- d. A nitrogen cover-pressure of between 585 and 664 psig.

APPLICABILITY: MODES 1, 2, and 3*.

ACTION:

- a. With one accumulator inoperable, except as a result of a closed isolation valve, restore the inoperable accumulator to OPERABLE status within 8 hours or be in at least HOT STANDBY within the next 6 hours and reduce pressurizer pressure to less than 1000 psig within the following 6 hours.
- b. With one accumulator inoperable due to the isolation valve being closed, either immediately open the isolation valve or be in at least HOT STANDBY within 6 hours and reduce pressurizer pressure to less than 1000 psig within the following 6 hours.
- c. With one pressure or water level channel inoperable per accumulator, return the inoperable channel to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- d. With two pressure channels or two water level channels inoperable per accumulator, immediately declare the affected accumulator(s) inoperable.

SURVEILLANCE REQUIREMENTS

4.5.1.1 Each accumulator shall be demonstrated OPERABLE:

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 - 1) Verifying the contained borated water volume and nitrogen cover-pressure in the tanks, and

*Pressurizer pressure above 1000 psig.

BORON INJECTION SYSTEM

3/4.5.4 REFUELING WATER STORAGE TANK

LIMITING CONDITION FOR OPERATION

3.5.4 The refueling water storage tank (RWST) shall be OPERABLE with:

- a. A minimum contained borated water volume of 477,000 gallons.
- b. A boron concentration between 2700 and 2900 ppm of boron.
- c. A minimum solution temperature of 50°F, and
- d. A maximum solution temperature of 98°F.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With the RWST inoperable, restore the tank to OPERABLE status within 1 hour or be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.5.4 The RWST shall be demonstrated OPERABLE:

- a. At least once per 7 days by:
 - 1) Verifying the contained borated water volume in the tank, and
 - 2) Verifying the boron concentration of the water.
- b. At least once per 24 hours by verifying the RWST temperature.

REACTIVITY CONTROL SYSTEMS

BASES

BORATION CONTROL

3/4.1.1.3 MODERATOR TEMPERATURE COEFFICIENT (Continued)

The surveillance requirements for measurement of the MTC at the beginning and near the end of the fuel cycle are adequate to confirm that the MTC remains within its limits since this coefficient changes slowly due principally to the reduction in RCS boron concentration associated with fuel burnup.

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3/4.1.1.4 MINIMUM TEMPERATURE FOR CRITICALITY

This specification ensures that the reactor will not be made critical with the Reactor Coolant System average temperature less than 551° F. This limitation is required to ensure: (1) the moderator temperature coefficient is within its analyzed temperature range, (2) the trip instrumentation is within its normal operating range, (3) the pressurizer is capable of being in an OPERABLE status with a steam bubble, and (4) the reactor vessel is above its minimum RT_{NDT} temperature.

3/4.1.2 BORATION SYSTEMS

The Boron Injection System ensures that negative reactivity control is available during each mode of facility operation. The components required to perform this function include: (1) borated water sources, (2) charging pumps, (3) separate flow paths, (4) boric acid transfer pumps, and (5) an emergency power supply from OPERABLE diesel generators.

With the RCS in MODES 1, 2, or 3, a minimum of two boron injection flow paths are required to ensure single functional capability in the event an assumed failure renders one of the flow paths inoperable. The boration capability of either flow path is sufficient to provide a SHUTDOWN MARGIN as specified in the CORE OPERATING LIMITS REPORT from expected operating conditions after xenon decay and cooldown to 200°F. The maximum expected boron capability requirement occurs at EOL from full power equilibrium xenon conditions and requires 22,000 gallons of 7000 ppm borated water from the boric acid storage tanks or a minimum contained volume of 477,000 gallons of 2700-2900 ppm borated water from the refueling water storage tank (RWST).

The limitation for a maximum of one centrifugal charging pump to be OPERABLE and the Surveillance Requirement to verify all charging pumps except the required OPERABLE pump to be inoperable in MODES 4, 5, and 6 provides assurance that a mass addition pressure transient can be relieved by operation of a single PORV or an RHR suction relief valve.

As a result of this, only one boron injection system is available. This is acceptable on the basis of the stable reactivity condition of the reactor, the emergency power supply requirement for the OPERABLE charging pump and the additional restrictions prohibiting CORE ALTERATIONS and positive reactivity changes in the event the single injection system becomes inoperable.

REACTIVITY CONTROL SYSTEMS

BASES

3/4.1.2 BORATION SYSTEMS (Continued)

The boron capability required below 200°F is sufficient to provide a SHUTDOWN MARGIN as specified in the CORE OPERATING LIMITS REPORT after xenon decay and cooldown from 200° F to 140° F. This condition requires a minimum contained volume of 6500 gallons of 7000 ppm borated water from the boric acid storage tanks or a minimum contained volume of 24,500 gallons of 2700 ppm borated water from the RWST.

The contained water volume limits include allowance for water not available because of discharge line location and other physical characteristics.

The limits on contained water volume and boron concentration of the RWST also ensure a pH value of between 8.5 and 11.0 for the solution recirculated within containment after a LOCA. This pH band minimizes the evolution of iodine and minimizes the effect of chloride and caustic stress corrosion on mechanical systems and components.

The OPERABILITY of one Boron Injection System during REFUELING ensures that this system is available for reactivity control while in MODE 6.

The limitations on OPERABILITY of isolation provisions for the Boron Thermal Regeneration System and the Reactor Water Makeup System in Modes 4, 5, and 6 ensure that the boron dilution flow rates cannot exceed the value assumed in the transient analysis.

3/4.1.3 MOVABLE CONTROL ASSEMBLIES

The specifications of this section ensure that: (1) acceptable power distribution limits are maintained, (2) the minimum SHUTDOWN MARGIN is maintained, and (3) the potential effects of rod misalignment on associated accident analyses are limited. OPERABILITY of the control rod position indicators is required to determine control rod positions and thereby ensure compliance with the control rod alignment and insertion limits. Verification that the Digital Rod Position Indicator agrees with the demanded position within ± 12 steps at 24, 48, 120, and 228 steps withdrawn for the Control Banks and 18, 210, and 228 steps withdrawn for the Shutdown Banks provides assurances that the Digital Rod Position Indicator is operating correctly over the full range of indication. Since the Digital Rod Position Indication System does not indicate the actual shutdown rod position between 18 steps and 210 steps, only points in the indicated ranges are picked for verification of agreement with demanded position.

The ACTION statements which permit limited variations from the basic requirements are accompanied by additional restrictions which ensure that the original design criteria are met. Misalignment of a rod requires measurement of peaking factors and a restriction in THERMAL POWER. These restrictions provide assurance of fuel rod integrity during continued operation. In addition, those safety analyses affected by a misaligned rod are reevaluated to confirm that the results remain valid during future operation.

IV. Determination of Significant Hazards for Proposed Changes

1. *The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.*

The proposed changes involve the boron concentrations in borated water sources and the post-LOCA time for switchover to hot leg recirculation for Cycle 5 and future cycles. No changes are made to the design or manner of operation of structures, systems or components.

The boron concentrations in borated water sources affect the Shutdown Margin following most plant transients and affect the consequences of a boron dilution incident. The proposed changes in boron concentrations assure the post event Shutdown Margin required by Technical Specifications will be met and the consequences of a boron dilution event remain as previously evaluated. The proposed upper limit on boron concentration in the RWST and Accumulators also ensures that the boron solubility limit will not be approached in these volumes. The proposed changes in boron concentrations do not affect the probability of previously evaluated accidents.

The proposed changes to the boron concentration limits in accumulators and the RWST continue to assure an acceptable range of pH of between 8.5 and 11.0 for the solution recirculated within containment after a LOCA.

The post-LOCA time for switchover to hot leg recirculation is changed from 18 hours to 9 hours to assure the core region does not approach the boron precipitation limit. The available hot leg recirculation flow is sufficient to remove decay heat at 9 hours. The change in hot leg switchover time does not increase the previously calculated consequences of a LOCA.

Therefore, the proposed changes do not involve an increase in the probability or consequences of an accident previously evaluated.

2. *The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.*

As described above, the changes proposed in this LAR involve changes in the boron concentrations in borated water sources and the post-LOCA time for switchover to hot leg recirculation for Cycle 5 and future cycles. These changes do not cause the associated structures, systems, or components to be operated outside their original design envelope. No changes are made to the design or manner of operation of structures, systems, or components. No new failure mechanisms are introduced. Therefore, the proposed changes do not create the possibility of a new or different accident from any accident previously evaluated.

3. *The proposed changes do not result in a significant reduction in the margin of safety.*

The margin of safety is defined by: 1) the acceptance criteria for the design of associated structures, systems, or components; and 2) the acceptance criteria for previously evaluated accidents.

As previously stated, the proposed changes do not cause the associated structures, systems or components to be operated outside their original design envelope.

Similarly the proposed changes assure that the acceptance criteria for previously evaluated accidents continue to be met for Cycle 5 and future cycles. The proposed changes in boron concentrations assure the post event Shutdown Margin required by Technical Specifications will continue to be met and the consequences of a boron dilution event remain as previously evaluated. The proposed upper limit on boron concentration in the RWST and Accumulators also ensures that the boron solubility limit will not be approached in these volumes.

The proposed changes to the boron concentration limits in Accumulators and the RWST continue to assure an acceptable range of pH of between 8.5 and 11.0 for the solution recirculated within containment after a LOCA. The change in post-LOCA hot leg switchover time from 18 to 9 hours assures the core region does not approach the boron precipitation limit. The available hot leg recirculation flow is sufficient to remove decay heat at nine hours. The core will remain subcritical in the cold condition and amenable to long term cooling following a LOCA.

Therefore, the proposed changes do not result in a reduction in the margin of safety.

IV. Proposed Schedule for License Amendment Issuance and Effectiveness

North Atlantic requests NRC review of License Amendment Request 95-01 and issuance of a license amendment having immediate effectiveness by November 1, 1995.

VI. Environmental Impact Assessment

North Atlantic has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor increase the types and amounts of effluent that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, North Atlantic concludes that the proposed change meets the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement.