

Enclosure 2 to Document Control Desk Letter
TSP 890005
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PROPOSED TECHNICAL SPECIFICATION CHANGE - TSP 890005
VIRGIL C. SUMMER NUCLEAR STATION

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INSTRUMENTATION

ACCIDENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.6 The accident monitoring instrumentation channels shown in Table 3.3-10 shall be OPERABLE.

APPLICABILITY: ~~MODES 1, 2 and 3.~~ *As shown in Table 3.3-10.*

ACTION: *As shown in Table 3.3-10.*

- a. *^* With the number of OPERABLE accident monitoring channels less than the Required Number of Channels shown in Table 3.3-10, restore the inoperable channel(s) to OPERABLE status within 7 days, or be in at least HOT SHUTDOWN within the next 12 hours.
- b. With the number of OPERABLE accident monitoring channels less than the Minimum Channels OPERABLE requirements of Table 3.3-10; either restore the inoperable channels to OPERABLE status within 48 hours or be in at least HOT SHUTDOWN within the next 12 hours.

b ~~x~~ The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.6 Each accident monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3-7. *

* Surveillance Requirements for the Hydrogen Monitoring Instrumentation are governed by TS 4.6.5.1.

For the Reactor Building Radiation Level Instrumentation, a CHANNEL CALIBRATION may consist of an electronic calibration of the channel, not including the detector, for the range decades above 10 R/hr and a single point calibration of the detector below

10 R/hr with an installed or portable gamma source.

TABLE 3.3-10

ACCIDENT MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>REQUIRED NO. OF CHANNELS</u>	<u>MINIMUM CHANNELS OPERABLE</u>
1. Reactor Building Wide Range Pressure	2	1
2. Reactor Coolant Outlet Temperature - T_{HOT} (Wide Range)	2	1
3. Reactor Coolant Inlet Temperature - T_{COLD} (Wide Range)	2	1
4. Reactor Coolant Pressure - Wide Range	2	1
5. Pressurizer Water Level	2	1
6. Steam Line Pressure	2/stm. gen.	1/steam generator
7. Steam Generator Water Level - Wide Range	1/stm. gen.	1/steam generator
8. Emergency Feedwater Flow	1/stm. gen.	1/steam generator
9. Refueling Water Storage Tank Water Level	2	1
10. Boric Acid Tank Water Level	2/tank	1/tank
11. Reactor Building Spray Pump Discharge Flow	2	1
12. Reactor Building Temperature	2	1

REPLACE WITH NEW TABLE 3.3-10

TABLE 3.3-10 (Continued)
ACCIDENT MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>TOTAL OF CHANNELS</u>	<u>MINIMUM CHANNELS OPERABLE</u>
13. Reactor Building/RHR Sump Level	2	1
14. DELETED.		
15. Condensate Storage Tank Level	2	1
16. Reactor Building Cooling Unit Service Water Flow	2	1
17. Service Water Temperature-Reactor Building Cooling Unit (Inlet and Discharge)	2 pairs	1 pair
18. NaOH Storage Tank Level	2	1
19. Reactor Coolant System Subcooling Margin Monitor	2	1
20. Pressurizer PORV Position Indicator	2/valve*	1/valve*
21. Pressurizer PORV Block Valve Position Indicator	1/valve	1/valve
22. Pressurizer Safety Valve Position Indicator	2/valve	1/valve
23. In-Core Thermocouples	4/core quadrant	2/core quadrant
24. Reactor Vessel Level	2	1

* Not required when the associated block valve is closed per Specification 3.4.4.

TABLE 4.3-7

ACCIDENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INSTRUMENT	CHANNEL CHECK	CHANNEL CALIBRATION
2 X. Reactor Building Wide Range Pressure	M S	R
6 X. Reactor Coolant Outlet Temperature - T_{HOT} (Wide Range)	M S	R
7 X. Reactor Coolant Inlet Temperature - T_{COLD} (Wide Range)	M S	R
8 X. Reactor Coolant Pressure - Wide Range	M S	R
9 X. Pressurizer Water Level	M S	R
14 X. Steam Line Pressure	M S	R
15 X. Steam Generator Water Level - Wide Range	M S	R
17 X. Emergency Feedwater Flow	M S	R
19 X. RWST Water Level	M S	R
10. Boric Acid Tank Solution Level	M -	R
11. Reactor Building Spray Pump Discharge Flow	M -	R
1. Reactor Building Pressure - Narrow Range	M S	R
3. Reactor Building Radiation Level - High Range	M S	R
4. Reactor Building Hydrogen Concentration	*	*
13. Neutron Flux	S	R

TABLE 4.3-7 (continued)

ACCIDENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INSTRUMENT	CHANNEL CHECK	CHANNEL CALIBRATION
12. Reactor Building Temperature	M	R
5 13. Reactor Building/RHR Sump Level	M S	R
14. DELETED		
15. Condensate Storage Tank Level	M	R
16. Reactor Building Cooling Unit Service Water Flow <i>Steam Generator Water Level - Narrow Range</i>	M S	R
17. Service Water Temperature Reactor Building Cooling Unit (Inlet and Discharge)	M	R
18. Emergency Feedwater Flow - Narrow Range <i>NaOH Storage Tank Level</i>	M S	R
10 18. Reactor Coolant System Subcooling Margin Monitor	M S	R
20. Pressurizer PORV Position Indicator	M *	R *
21. Pressurizer PORV Block Valve Position Indicator	M	R
22. Pressurizer Safety Valve Position Indicator	M	R
12 25. Core Thermocouples <i>Exit Temperature</i>	M S	R
11 24. Reactor Vessel Level	M S	R

* Not required when the associated block valve is closed per Specification 3.4.4.

* Surveillance Requirements per TS 4.6.5.1

INSTRUMENTATION

ACCIDENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.6 The accident monitoring instrumentation channels shown in Table 3.3-10 shall be OPERABLE.

APPLICABILITY As shown in Table 3.3-10.

ACTION:

- a. As shown in Table 3.3-10.
- b. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.6 Each accident monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3.7.*

* Surveillance Requirements for the Hydrogen Monitoring Instrumentation are governed by TS 4.6.5.1.

For the Reactor Building Radiation Level Instrumentation, a CHANNEL CALIBRATION may consist of an electronic calibration of the channel, not including the detector, for the range decades above 10R/hr and a single point calibration of the detector below 10R/hr with an installed or portable gamma source.

TABLE 3.3-10

ACCIDENT MONITORING INSTRUMENTATION

INSTRUMENT	REQUIRED NO. OF CHANNELS	MINIMUM CHANNELS OPERABLE	ACTION	APPLICABLE MODES
1. Reactor Building Pressure - Narrow Range Instrument Loop/Indicator: Channel D IPT-951/IPI-951 Channel B IPT-952/IPI-952	2	1	1	1, 2, 3
2. Reactor Building Pressure - Wide Range Instrument Loop/Indicator: Channel D IPT-954A/IPI-954A Channel E IPT-954B/IPI-954B	2	1	1	1, 2, 3
3. Reactor Building Radiation Level - High Range - Instrument Loop/Indicator: Channel A RMG-18 Channel B RMG-7	2	1	2	1, 2, 3, 4
4. Reactor Building Hydrogen Concentration Instrument Loop/Indicator: Channel A IAE-8263A/ICI-8257 Channel B IAE-8263B/ICI-8258	2	1	3	1, 2
5. Reactor Building/RHR Sump Level Instrument Loop/Indicator: Channel A ILT-1969/ILI-1969 Channel B ILT-1970/ILI-1970	2	1	1	1, 2, 3
6. Reactor Coolant Outlet Temperature - T _{Hot} - Wide Range - Instrument Loop/Indicator: Channel A ITE-413/ITI-413 Channel A ITE-423/ITI-423 Channel E ITE-433/ITR-413	2	1	1	1, 2, 3

TABLE 3.3-10 (continued)

ACCIDENT MONITORING INSTRUMENTATION

INSTRUMENT	REQUIRED NO. OF CHANNELS	MINIMUM CHANNELS OPERABLE	ACTION	APPLICABLE MODES
7. Reactor Coolant Inlet Temperature - TCold - Wide Range - Instrument/Loop Indicator: Channel E ITE-410/ITI-410 Channel E ITE-420/ITI-420 Channel E ITE-430/ITR-410	2	1	1	1, 2, 3
8. Reactor Coolant Pressure - Wide Range Instrument Loop/Indicator: Channel E IPT-402/IPI-402 Channel A IPT-403/IPI-403	2	1	1	1, 2, 3
9. Pressurizer Water Level Instrument Loop/Indicator: Channel A ILT-459/ILI-459 Channel D ILT-460/ILI-460 Channel B ILT-461/ILI-461	2	1	1	1, 2, 3
10. Reactor Coolant System Subcooling Margin Instrument Loop/Indicator: Channel A ITM-499A Channel B ITM-499B	2	1	1	1, 2, 3
11. Reactor Vessel Level Instrument Loop/Indicator: Channel A ILT-1311/ILI-1311, ILT-1312/ILI-1312 Channel B ILT-1321/ILI-1321, ILT-1322/ILI-1322	2	1	1	1, 2, 3

TABLE 3.3-10 (continued)

ACCIDENT MONITORING INSTRUMENTATION

INSTRUMENT	REQUIRED NO. OF CHANNELS	MINIMUM CHANNELS OPERABLE	ACTION	APPLICABLE MODES
12. Core Exit Temperature Instrument Loop/Indicator: Channel A Channel B ITEs 4,12,27,32, ITEs 1,5,10,30, 2,29,31,35,13,22 34,43,44,49,50,3, 47,9,15,25,45,21, 11,36,40,6,7,17,18, 28,33,39,41,19,24, 8,14,38,48,16,20, 26,42,46,23 37,51 (Primary display is the plant computer) (Backup displays are ITM 499 A&B)	4/core quadrant/ channel	2/core quadrant/ channel	1	1, 2, 3
13. Neutron Flux Instrument Loop/Indicator: Channel A INM-35 Channel B INM-36	2	1	1	1, 2, 3
14. Steam Line Pressure Instrument Loop/Indicator: SG A IPTs-474, 475, 476/IPIs-474, 475, 476 SG B IPTs-484, 485, 486/IPIs-484, 485, 486 SG C IPTs-494, 495, 496/IPIs-494, 495, 496	2/stm. gen.	1/stm. gen.	1	1, 2, 3
15. Steam Generator Water Level - Wide Range Instrument Loop/Indicator SG A ILT-477/ILI-477 SG B ILT-487/ILI-487 SG C ILT-497/ILI-497	1/stm. gen.	1/stm. gen.	1	1, 2, 3
16. Steam Generator Water Level - Narrow Range Instrument Loop/Indicator: SG A ILTs 474, 475, 476/ILIs 474, 475, 476 SG B ILTs 484, 485, 486/ILIs 484, 485, 486 SG C ILTs 494, 495, 496/ILIs 494, 495, 496	2/stm. gen.	1/stm. gen.	1	1, 2, 3

TABLE 3.3-10 (continued)

ACCIDENT MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>REQUIRED NO. OF CHANNELS</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>ACTION</u>	<u>APPLICABLE MODES</u>
17. Emergency Feedwater Flow - Wide Range Instrument Loop/Indicator: SG A IFT-3561/IFI-3561 SG B IFT-3571/IFI-3571 SG C IFT-3581/IFI-3581	1/stm. gen.	1/stm. gen.	1	1, 2, 3
18. Emergency Feedwater Flow - Narrow Range Instrument Loop/Indicator: SG A IFT-3561A/IFI-3561A SG B IFT-3571A/IFI-3571A SG C IFT-3581A/IFI-3581A	1/stm. gen.	1/stm. gen.	1	1, 2, 3
19. Refueling Water Storage Tank Level Instrument Loop/Indicator: Channel A ILT-990/ILI-990 Channel B ILT-992/ILI-992	2	1	1	1, 2, 3

Table 3.3.10 (Continued)

ACTION STATEMENTS

- ACTION 1. a. With the number of OPERABLE accident monitoring channels less than the Required Number of Channels shown on Table 3.3-10, restore the inoperable channel(s) to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the next 6 hours.
- b. With the number of OPERABLE accident monitoring channels less than the Minimum Channels Operable requirement of Table 3.3-10, either restore the inoperable channels to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the next 6 hours.
- ACTION 2. a. With the number of OPERABLE channels less than the required by the Minimum Channels Operable requirement, either restore the inoperable channel(s) to OPERABLE status within 72 hours, or:
- 1) Initiate the preplanned alternate method of monitoring the appropriate parameter(s), and
- 2) Prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 14 days following the event outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status.
- ACTION 3. a. With one hydrogen monitor inoperable, restore the inoperable monitor to the OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours.
- b. With both hydrogen monitors inoperable, restore at least one monitor to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours.

TABLE 4.3-7

ACCIDENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INSTRUMENT	CHANNEL CHECK	CHANNEL CALIBRATION
1. Reactor Building Pressure - Narrow Range	S	R
2. Reactor Building Pressure - Wide Range	S	R
3. Reactor Building Radiation Level - High Range	S	R
4. Reactor Building Hydrogen Concentration	*	*
5. Reactor Building/RHR Sump Level	S	R
6. Reactor Coolant Outlet Temperature - T_{Hot} (Wide Range)	S	R
7. Reactor Coolant Inlet Temperature - T_{Cold} (Wide Range)	S	R
8. Reactor Coolant Pressure - Wide Range	S	R
9. Pressurizer Water Level	S	R
10. Reactor Coolant System Subcooling Margin	S	R
11. Reactor Vessel Level	S	R
12. Core Exit Temperature	S	R
13. Neutron Flux	S	R

TABLE 4.3-7 (continued)

ACCIDENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>INSTRUMENT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>
14. Steam Line Pressure	S	R
15. Steam Generator Water Level - Wide Range	S	R
16. Steam Generator Water Level - Narrow Range	S	R
17. Emergency Feedwater Flow - Wide Range	S	R
18. Emergency Feedwater Flow - Narrow Range	S	R
19. Refueling Water Storage Tank Level	S	R
* Surveillance Requirement per TS 4.6.5.1		

PROPOSED TECHNICAL SPECIFICATION CHANGE - TSP 890005
VIRGIL C. SUMMER NUCLEAR STATION

DESCRIPTION AND SAFETY EVALUATION

DESCRIPTION OF AMENDMENT REQUEST

SCE&G proposes to modify the VCSNS TS to revise TS 3/4.3.3.6, Tables 3.3-10 and 4.3-7, "Accident Monitoring Instrumentation," and "Accident Monitoring Instrumentation Surveillance Requirements," respectively. This change will reflect the plant variables (key variables) that provide primary information required to permit control room operators to take specified manually controlled actions, for which no automatic control is provided, after initial stages of an accident and that are required for safety systems to accomplish their safety function for design basis accident events.

The instrumentation, to be included in Tables 3.3-10 and 4.3-7, is designated type A category 1, except for the Subcooling Margin Monitor which is category 2 but meets the intent of category 1, and non-type A category 1. This designation is in accordance with the guidance given in Regulatory Guide (RG) 1.97, revision 3, as reported to the NRC and found acceptable in their Safety Evaluation Reports dated November 13, 1987, and July 27, 1988. The following instrumentation shall be included in Tables 3.3-10 and 4.3-7:

1. Reactor Building Pressure - Narrow Range
2. Reactor Building Pressure - Wide Range
3. Reactor Building Radiation Level - High Range
4. Reactor Building H₂ Concentration
5. Reactor Building/RHR Sump Level
6. Reactor Coolant Outlet Temperature - T_{Hot} - Wide Range
7. Reactor Coolant Inlet Temperature - T_{Cold} - Wide Range
8. Reactor Coolant Pressure - Wide Range
9. Pressurizer Water Level
10. Reactor Coolant System Subcooling Margin
11. Reactor Vessel Water Level
12. Core Exit Temperature
13. Neutron Flux
14. Steam Line Pressure
15. Steam Generator Water Level - Wide Range
16. Steam Generator Water Level - Narrow Range
17. Emergency Feedwater Flow - Wide Range
18. Emergency Feedwater Flow - Narrow Range
19. Refueling Water Storage Tank Level

The following non-Category 1 instrumentation shall be deleted from Tables 3.3-10 and 4.3-7:

1. Boric Acid Tank Water Level
2. Reactor Building Spray Pump Discharge Flow
3. Reactor Building Temperature
4. Condensate Storage Tank Level
5. Reactor Building Cooling Unit Service Water Flow
6. Service Water Temperature-Reactor Building Cooling Unit (Inlet and Discharge)
7. Pressurizer PORV Position Indicator
8. Pressurizer PORV Block Valve Position Indicator
9. Pressurizer Safety Valve Position Indicator
10. Sodium Hydroxide Storage Tank Level

The action statements for the Reactor Building Radiation Level and the Reactor Building Hydrogen Concentration have been changed to be consistent with existing technical specifications. The allowable outage time for the rest of the instruments has been changed from 7 to 30 days (for conditions in which the number of OPERABLE accident monitoring channels is less than the Required Number of Channels) and from 48 hours to 7 days (for conditions in which the number of OPERABLE accident monitoring channels is less than the Minimum Channels Operable) both requiring a reduction to mode 3 (HOT STANDBY) within 6 hours, and then to mode 4 (HOT SHUTDOWN) within the next 6 hours.

Administrative changes were made to TS 3/4.3.3.6, Tables 3.3-10 and 4.3-7.

SAFETY EVALUATION

The proposed TS change incorporates the type A category 1 and non-type A category 1 variables into VCSNS's "Accident Monitoring Instrumentation, Table 3.3-10," and "Accident Monitoring Instrumentation Surveillance Requirements, Table 4.3-7." VCSNS's selection of category 1 key variables is documented in its Summary Report on Regulatory Guide 1.97, originally submitted to the NRC on April 15, 1985, amended by various letters referenced in this amendment request (Enclosure 1), and evaluated and accepted by the NRC in their letters of November 13, 1987, and July 27, 1988, and their enclosed Safety Evaluations.

The action statements for the Reactor Building Radiation Level indication and the Reactor Building Hydrogen Concentration have been changed to be consistent with TS 3/4.3.3 and 3/4.6.5, respectively.

The increase of the allowable outage time from 7 to 30 days in action statement 1, applicable to the condition in which the number of OPERABLE

accident monitoring channels is less than the Required Number of Channels, is based on: VCSNS's low failure rates for these types of components, the availability of a remaining operable channel, the passive nature of the channel, and the low probability of an event requiring accident monitoring instrumentation during this interval.

The increase of the allowable outage time from 48 hours to 7 days in action statement 1, applicable to the condition in which the number of OPERABLE accident monitoring channels is less than the Minimum Channels Operable, is based on the relatively low probability of an event requiring accident monitoring instrument operation, and the availability of alternate means to obtain the required information. Continuous operation with two required channels inoperable in a function is not acceptable because the alternate indications may not fully meet the requirements applied to the accident monitoring instrumentation. Therefore, requiring restoration of one inoperable channel of the function limits the risk that the accident monitoring function will be degraded should an accident occur.

The change of action statement 1 requiring the plant to go to HOT STANDBY and then to HOT SHUTDOWN has no impact on the safety of the plant since it merely identifies the proper stages of plant shutdown which assumes that the plant is at 0% power.

PROPOSED TECHNICAL SPECIFICATION CHANGE - TSP890005
VIRGIL C. SUMMER NUCLEAR STATION

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

DESCRIPTION OF AMENDMENT REQUEST

SCE&G proposes to modify the VCSNS TS to revise TS 3/4.3.3.6, Tables 3.3-10 and 4.3-7, "Accident Monitoring Instrumentation," and "Accident Monitoring Instrumentation Surveillance Requirements," respectively. This change will reflect the plant variables (key variables) that provide primary information required to permit control room operators to take specified manually controlled actions, for which no automatic control is provided, after initial stages of an accident and that are required for safety systems to accomplish their safety function for design basis accident events.

The instrumentation, to be included in Tables 3.3-10 and 4.3-7, is designated type A category 1, except for the Subcooling Margin Monitor which is category 2 but meets the intent of category 1, and non-type A category 1. This designation is in accordance with the guidance given in Regulatory Guide (RG) 1.97, revision 3, as reported to the NRC and found acceptable in their Safety Evaluation Reports dated November 13, 1987, and July 27, 1988. The following instrumentation shall be included Tables 3.3-10 and 4.3-7:

1. Reactor Building Pressure - Narrow Range
2. Reactor Building Pressure - Wide Range
3. Reactor Building Radiation Level - High Range
4. Reactor Building H₂ Concentration
5. Reactor Building/RHR Sump Level
6. Reactor Coolant Outlet Temperature - T_{Hot} - Wide Range
7. Reactor Coolant Inlet Temperature - T_{Cold} - Wide Range
8. Reactor Coolant Pressure - Wide Range
9. Pressurizer Water Level
10. Reactor Coolant System Subcooling Margin
11. Reactor Vessel Water Level
12. Core Exit Temperature
13. Neutron Flux
14. Steam Line Pressure
15. Steam Generator Water Level - Wide Range
16. Steam Generator Water Level - Narrow Range
17. Emergency Feedwater Flow - Wide Range
18. Emergency Feedwater Flow - Narrow Range
19. Refueling Water Storage Tank Level

The following instrumentation shall be deleted from Tables 3.3-10 and 4.3-7:

1. Boric Acid Tank Water Level
2. Reactor Building Spray Pump Discharge Flow
3. Reactor Building Temperature
4. Condensate Storage Tank Level
5. Reactor Building Cooling Unit Service Water Flow
6. Service Water Temperature-Reactor Building Cooling Unit (Inlet and Discharge)
7. Pressurizer PORV Position Indicator
8. Pressurizer PORV Block Valve Position Indicator
9. Pressurizer Safety Valve Position Indicator
10. Sodium Hydroxide Storage Tank Level

The action statements for the Reactor Building Radiation Level and the Reactor Building Hydrogen Concentration have been changed to be consistent with existing technical specifications. The allowable outage time for the rest of the instruments has been changed from 7 to 30 days (for conditions in which the number of OPERABLE accident monitoring channels is less than the Required Number of Channels) and from 48 hours to 7 days (for conditions in which the number of OPERABLE accident monitoring channels is less than the Minimum Channels Operable) both requiring a reduction to mode 3 (HOT STANDBY) within 6 hours, and then to mode 4 (HOT SHUTDOWN) within the next 6 hours.

Administrative changes were made to TS 3/4.3.3.6, Tables 3.3-10 and 4.3-7.

BASIS FOR DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

SCE&G has evaluated the proposed TS change and has determined that it does not represent a significant hazards consideration, based on the criteria established in 10 CFR 50.92(c). Operation of VCSNS in accordance with the proposed action will not:

- (1) Involve a significant increase in the probability or the consequences of an accident previously evaluated.

Regulatory Guide 1.97 furnishes standards acceptable to the NRC for providing instrumentation to monitor plant variables and systems during and following an accident. The purpose of the accident monitoring instrumentation is to display plant variables that provide information required by the control room operators for manual actions and long term recovery. Determination of variable types and category designations for VCSNS was accomplished from a review of the Emergency Response Guidelines (ERGs), the Final Safety Analysis Report, and the Westinghouse Owners Group (WOG) ERGs. The WOG ERGs were used at VCSNS as a basis for the Emergency Response Procedures. Operability of the instruments used for accident monitoring ensures there is sufficient

information available on selected plant parameters to monitor plant status during and following an accident. The changes proposed do not affect components that can cause an accident. The increase in allowable outage times from 7 to 30 days or from 48 hours to 7 days does not significantly affect the consequences of an event previously evaluated. The channel redundancy and the relatively short outage times, coupled with the low probability of an event requiring accident monitoring instrumentation during this interval, ensure that sufficient information is available for operator manual actions. The condition of the plant in either HOT STANDBY or HOT SHUTDOWN, the first stage of the plant shutdown process, has no impact on the assumptions made in the accident analysis. Therefore, the proposed change does not increase the probability or consequences of any accident previously evaluated.

- (2) Create the possibility of a new or different kind of accident from any previously analyzed.

The proposed change is consistent with the requirements of RG 1.97. The accident monitoring instrumentation will make available reliable information to plant control room operators to mitigate the consequences of a design basis accident. The first stage of plant shutdown, HOT STANDBY and HOT SHUTDOWN, are plant modes for which VCSNS has been analyzed. Therefore, the changes proposed do not create the possibility of a new or different kind of accident from any previously analyzed.

- (3) Involve a significant reduction in a margin of safety.

The inclusion of category 1, type A or B, instrumentation in the TS provides assurance that adequate information is available to the operators to maintain VCSNS in a safe condition during and following a design basis accident. Accomplishment of specific manual action by the control room operators is enhanced due to the availability and reliability of the indications. The proposed changes do not affect the design or operation of safety related components relied upon to automatically mitigate the consequences of a design basis event. The proposed change from HOT SHUTDOWN to HOT STANDBY as the first stage of plant shutdown will not affect the design or operation of any safety related system or component. Therefore, the changes proposed would not involve a reduction in any margin of safety.