

Docket Number 50-346  
License Number NPF-3  
Serial Number 2081  
Enclosure  
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APPLICATION FOR AMENDMENT

TO

FACILITY OPERATING LICENSE NUMBER NPF-3

DAVIS-BESSE NUCLEAR POWER STATION

UNIT NUMBER 1

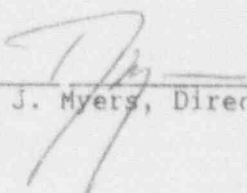
Attached are requested changes to the Davis-Besse Nuclear Power Station, Unit Number 1 Facility Operating License Number NPF-3 Appendix A, Technical Specifications. Also included is the Safety Assessment and Significant Hazards Consideration.

The proposed changes (submitted under cover letter Serial Number 2081) concern:

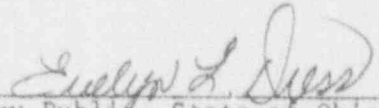
Technical Specification 3/4.3.1, Reactor Protection System Instrumentation.

Technical Specification 3/4.3.2.3, Anticipatory Reactor Trip System Instrumentation.

For: D. C. Shelton, Vice President - Nuclear

By:   
T. J. Myers, Director - Technical Services

Sworn and subscribed before me this 13th day of November, 1992

  
Notary Public, State of Ohio  
EVELYN L. DRESS  
NOTARY PUBLIC, STATE OF OHIO  
My Commission Expires July 28, 1994

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The following information is provided to support issuance of the requested changes to the Davis-Besse Nuclear Power Station, Unit Number 1 Operating License Number NPF-3, Appendix A, Technical Specifications, Technical Specifications 3/4.3.1 and 3/4.3.2.3.

- A. Time required to implement: These changes are to be implemented within 90 days after issuance of the License Amendment by the NRC.
- B. Reason for change (License Amendment Request Number 90-0002):  
These changes are required to implement increased RPS and ARTS channel functional test surveillance test intervals and RPS allowed-out-of-service times as permitted by the NRC-approved Babcock and Wilcox (B&W) Topical Report, BAW-10167, "Justification for Increasing the Reactor Trip System On-Line Test Intervals," and supplements. These changes will result in better utilization of technician resources and reduce the potential for spurious reactor trips during testing and when one instrument channel is inoperable. The other proposed changes are required to prescribe appropriate actions to be taken if two RPS channels become inoperable; make surveillance requirements for the source and intermediate range instrumentation commensurate with the functions performed; and, correct a typographical error.
- C. Safety Assessment and Significant Hazards Consideration: See Attachment.

SAFETY ASSESSMENT AND SIGNIFICANT HAZARDS CONSIDERATION  
FOR LICENSE AMENDMENT REQUEST NUMBER 90-0002

TITLE

Increase of Reactor Protection System (RPS) and Anticipatory Reactor Trip System (ARTS) Instrumentation Channel Functional Test Surveillance Interval and Allow Plant Operation to Continue Indefinitely with One Inoperable RPS Instrument Channel in Bypass.

DESCRIPTION

The main purpose of the proposed changes is to implement the NRC approved Babcock and Wilcox (B&W) Topical Report, BAW-10167, "Justification for Increasing the Reactor Trip System On-Line Test Intervals," and its supplements for the Davis-Besse Nuclear Power Station (DBNPS) Unit Number 1. The proposed changes revise the DBNPS Operating License, NPF-3, Appendix A, Technical Specifications (TS), 3/4.3.1, "Reactor Protection System Instrumentation," and 3/4.3.2.3, "Anticipatory Reactor Trip System Instrumentation," to:

1. Increase the channel functional test surveillance test interval for most RPS and ARTS instrument channels from monthly to semi-annually, on a staggered test basis.
2. Allow plant operation to continue indefinitely with one RPS instrument channel placed in bypass.
3. Add an action statement to permit continued operation for 48 hours with two of four RPS channels inoperable, one in trip and the other in bypass.
4. Eliminate channel functional test surveillance requirements for source and intermediate range neutron flux instrumentation.
5. Decrease the channel calibration surveillance test interval for the High Flux/Number of Reactor Coolant Pumps On trip from once every eighteen months to quarterly, to be consistent with the quarterly channel calibration surveillance interval for the High Flux and Flux -  $\Delta$ Flux - Flow Instrumentation.
6. Correct a typographical error in the numbering of page 3/4 3-30c.

Change 1) noted above consists of changes to TS Table 4.3-1, Reactor Protection System Instrumentation Surveillance Requirements, and TS Table 4.3-17, Anticipatory Reactor Trip System Instrumentation Surveillance Requirements. Specifically, in Table 4.3-1, the channel functional test surveillance test interval for functional units 3, 5, 6, 7, 9, and 14 is changed from "M" (monthly) to "SA(9)" (semi-annually with Note 9 applying). Note 9 is added to Table 4.3-1 to indicate the semi-annual channel functional tests are to be performed on a staggered test basis, consistent with the assumptions of BAW-10167. For

functional units 2 and 4, the channel functional test interval is changed from "M" to "N.A." (not applicable). The channel functional test is indicated as no longer applicable since these functional units are calibrated quarterly. The channel calibration includes the channel functional test by TS definition 1.9. Note 9 is also added to the quarterly calibration requirements of functional units 2 and 4 and to the monthly functional testing requirements of functional units 12 and 13 to ensure that these functional units are tested on a staggered test basis as assumed in BAW-10167. In Table 4.3-17, the channel functional test interval for functional units 1 and 2 is revised from "M" to "SA(c)" (semi-annually with Note (c) applying). Note (c) is added to Table 4.3-17 to indicate the semi-annual channel functional tests are to be performed on a staggered test basis, consistent with the assumptions of BAW-10167.

Change 2) above consists of changes to Table 3.3-1, Reactor Protection System Instrumentation, Actions 2 and 3. Action 2a is revised to require an inoperable channel be placed in either the bypassed or tripped condition within one hour. Action 2b is deleted. It is no longer necessary since Action 2a now permits an inoperable channel to be bypassed indefinitely and surveillance tests can be performed without resulting in a reactor trip while in this condition. Action 2c is unchanged but editorially becomes Action 2b. Similarly, Action 3 is revised to require an inoperable channel be placed in either the bypassed or tripped condition within one hour. Action 3b is deleted. It is no longer necessary since Action 3 now permits an inoperable channel to be bypassed indefinitely and surveillance tests can be performed without resulting in a reactor trip while in this condition.

Change 3) above consists of the addition of a new Action 10 to Table 3.3-1 which is applicable to functional units 2 through 9. Action 10 permits continued operation for 48 hours with two of four channels inoperable, one in trip and the other in bypass. Currently, the TS are unduly restrictive for the condition where two channels are inoperable. If this situation were to occur, TS 3.0.3 would immediately be invoked. The proposed Action 10 is adopted from the Restructured Standard Technical Specifications (RSTS) for B&W Plants (NUREG-1430, Section 3.3.1).

Change 4) above consists of changes to Table 4.3-1. Specifically the channel functional test interval for functional unit 10, intermediate range neutron flux and rate instrumentation, is revised from "S/U(5)(1)" (prior to reactor startup with Notes (1) and (5) applying) to "N.A.", and the channel functional test interval for functional unit 11, source range neutron flux and rate instrumentation, is revised from "M and S/U(1)(5)" (monthly while in Modes 2 through 5 and prior to reactor startup with Notes (1) and (5) applying) to "N.A.". Although these surveillance requirements technically are required only prior to startup and monthly for the source range instruments while the plant is shutdown, the channel functional test is performed monthly while the plant is operating in Mode 1 to assure that the surveillance requirements are always current in the event the plant experiences a reactor trip or unplanned shutdown (Reference DBNPS Licensee Event

Report (LER) 91-002). Toledo Edison considered increasing the monthly surveillance interval for the source range instrumentation to semi-annually under the umbrella of BAW-10167 to alleviate this burden. However, it was noted that the B&W RSTS eliminate the channel functional tests for source and intermediate range instrumentation on the basis that they perform only a monitoring function except for control rod withdrawal inhibit, which is only required during low power physics testing. For instrumentation that performs a monitoring function, the RSTS consider 18 month interval channel calibrations and channel checks each shift to be the appropriate surveillance requirements. As in the RSTS, the control rod withdrawal inhibit function is verified under the existing DBNPS Special Test Exception 3.10.2, Physics Tests, by surveillance requirement 4.10.2.2.

Change 5) above consists of a change to Table 4.3-1 for functional unit 8, High Flux/Number of Reactor Coolant Pumps On. Specifically, the channel calibration interval is decreased from "R" (18 months) to "Q(6,9)" (quarterly with Notes 6 and 9 applying). Note 6 exempts the neutron detectors from the channel calibration. Note 9 requires testing to be carried out on a staggered test basis consistent with the assumptions of BAW-10167. The High Flux/Number of Reactor Coolant Pumps On trip uses input from functional units 2 and 4, High Flux and Flux -  $\Delta$ Flux - Flow, respectively, which are calibrated quarterly. Since functional units 2 and 4 are required to be calibrated more frequently than functional unit 8, the potential exists for adjustments made during the calibration of functional units 2 and 4 to adversely affect the calibration of functional unit 8. DBNPS LER 92-006 documents such occurrences. It is therefore appropriate for functional units 2, 4, and 8 to be calibrated at the same frequency to reduce the future potential for such occurrences. The functional unit 8 channel functional test interval is also revised from "M" to "N.A.". As part of Change 1) above, the channel functional test interval for functional unit 8 would have been revised to SA(9) as justified by BAW-10167. However, because the proposed quarterly channel calibration includes the channel functional test, a semi-annual channel functional test is not applicable.

Change 6) above requests that the page number "3/4 30c" be changed to "3/4 3-30c" as an editorial correction.

#### SYSTEMS, COMPONENTS AND ACTIVITIES AFFECTED

The proposed changes affect surveillance test intervals and allowed out of service times for RPS and ARTS instrument channels. There are no hardware modifications involved.



#### SAFETY FUNCTION OF THE AFFECTED SYSTEMS, COMPONENTS AND ACTIVITIES

As described in the DENPS Updated Safety Analysis Report (USAR), Section 7.2, the RPS monitors various plant parameters (reactor coolant system pressure, temperature, flow, neutron flux, number of reactor coolant pumps on, and containment pressure) to detect undesired conditions and trip the reactor to protect the integrity of the fuel cladding and prevent reactor coolant system overpressure. The ARTS, described in USAR Section 7.4.1.4, monitors plant conditions (turbine trip, trip of both main feed pumps, steam and feedwater rupture control system) which are indicative of reduced secondary heat removal capability and initiates a reactor trip in advance of the RPS. Although the RPS reactor coolant system high pressure trip would ultimately trip the reactor during loss of secondary heat removal events, the ARTS initiates a reactor trip in advance of the RPS when conditions indicate reduced secondary heat removal capability. This action results in a lower peak RCS pressure during such events and reduces the potential for challenges to the pilot operated relief valve (PORV).

An RPS instrument channel can be taken out of service during plant operation and placed in either bypass or trip. RPS instrument channels are equipped with channel bypasses. The channel bypasses permit one channel of a functional unit to be bypassed to allow testing and maintenance of the instrument strings without increasing susceptibility to spurious trips. Susceptibility to spurious trips increases when a channel is placed in trip because RPS then operates as a one-out-of-three system, requiring only one of the remaining channels to trip to result in a reactor trip. With one channel bypassed, RPS operates as a two-out-of-three system, requiring the trip of a minimum of two of the remaining three channels to result in a reactor trip. The channel bypasses are key operated. The keys are under the administrative control of the shift supervisor. Hard-wired interlocks prevent more than one RPS channel from being bypassed at a time.

#### EFFECTS ON SAFETY

Changes 1) and 2)

The proposed increases in the channel functional test surveillance interval from one to six months for RPS and ARTS instrument channels, and the proposed change to allow plant operation to continue indefinitely with an RPS instrument channel in bypass have been shown to be acceptable by the NRC-approved Babcock and Wilcox (B&W) Topical Report BAW-10167, "Justification for Increasing the Reactor Trip System On-Line Test Intervals" and supplements. BAW-10167 was submitted to the NRC in June, 1986. BAW-10167 justifies increases to the RPS and ARTS channel functional test intervals from monthly to semi-annually on a staggered test basis and justifies plant operation for an indefinite period with a single inoperable channel placed in bypass. On March 14, 1988 Supplement 1 to BAW-10167 was submitted in response to NRC questions. The NRC Safety Evaluation Report (SER) related to BAW-10167 and Supplement 1 was issued on December 5, 1988.

The SER concluded that the proposed semi-annual channel functional test intervals for RPS instrument channels were acceptable provided that licensees confirm that the drift occurring over the proposed surveillance test interval would not cause the setpoint values to exceed those assumed in the safety analysis and specified in the TS. However, the original SER did not accept continued operation for an indefinite period with one channel in bypass and proposed to limit the allowable out of service time (AOT) to 48 hours. In November, 1989, the B&W Owners Group submitted BAW-10167, Supplement 2 which provided additional justification for an indefinite AOT. On July 8, 1992, the NRC Staff issued a supplemental SER to BAW-10167 which approved an indefinite AOT for one inoperable channel in bypass.

BAW-10167 used reliability block diagrams (RBD) to model RPS and ARTS. Separate models were constructed for the Oconee and Davis-Besse classes of plants. Separate models were required for the two classes of plants because the reactor trip breakers (RTB) trip only the safety control rod groups in the Oconee class of plants and the electronic trip (silicon controlled rectifier-SCR) is required to trip the regulating control rod groups. In the Davis-Besse class of plants, the RTBs and the electronic trip each trip all regulating and safety control rod groups. Because of this design difference, the Davis-Besse RPS is inherently more reliable and its unavailability (probability of failure on demand) is less sensitive to changes in surveillance intervals.

BAW-10167 used the PACRAT computer code to evaluate the time dependent RPS and ARTS unavailability for one, four, and six month channel functional test intervals using the RPS and ARTS reliability block diagram models. The models included the effects of changes in system configuration during testing and maintenance, and the effects of staggered testing. The effects of human errors and common mode failures associated with testing and maintenance were also assessed. The use of component failure data from operating experience was emphasized. Where directly applicable operating data was not available, standard generic data sources were used in BAW-10167. The RPS unavailability was calculated for one, four, and six month RPS instrument string channel functional test intervals. All cases were run with no restrictions on the allowable outage time (AOT) for one channel in bypass. That is one channel could be bypassed for the entire mean-time-to-repair (MTTR) distributed around a mean of 108 hours. To further justify an indefinite AOT, BAW-10167, Supplement 2 explicitly modeled the RPS as a four channel system with one channel continuously bypassed. Uncertainty analysis was performed to determine upper bound unavailabilities. For the Davis-Besse class of plants, the RPS and ARTS best estimate unavailability ranged from  $1.1 \times 10^{-9}$  for the current one month test interval to  $9.0 \times 10^{-9}$  for the proposed six-month test interval. BAW-10167 also estimated the overall effects of the changes on "risk" in terms of core damage frequency using the Oconee probabilistic risk assessment (PRA). Two competing effects on risk resulting from an increased test interval are a slight increase in risk due to greater RPS unavailability due to failures remaining undiscovered for a longer period and a decrease in risk due to fewer spurious trips during testing. BAW-10167 estimated there would be a net

reduction in core damage frequency with the increased testing interval. This effect is less for the DBNPS due to changes in performance of surveillance tests which reduce the likelihood of spurious trips during testing. However, the overall conclusion that the extension of the channel functional test interval and AOT has minimal adverse impact, if any, on safety remains valid.

As part of the NRC review of BAW-10167 and supplements, the NRC staff contracted the Idaho National Engineering Laboratory (INEL) to independently verify the conclusions of BAW-10167. INEL constructed and quantified a fault tree model of the RPS and ARTS to assess the effects of changes to surveillance intervals and AOTs, and to test the validity of assumptions made in BAW-10167. On the basis of the INEL review of BAW-10167, the NRC concluded that the proposed surveillance test intervals and AOTs do not contribute an unacceptable increase to overall risk.

As required by the NRC SER related to BAW-10167, Toledo Edison has reviewed as-found and as-left (drift) data for the affected instrument strings over the period from January, 1988 through July 31, 1992. (Instrument drift is defined as the portion between the upper leave-alone zone and the allowable value.) As result of this review, field setpoints for three functional units require adjustment, and acceptance criteria tolerances need to be tightened for six other functional units to ensure that RPS and ARTS will operate conservatively relative to TS/Safety Analysis setpoints with the longer channel functional test surveillance interval. Toledo Edison will make these changes prior to utilizing the increased channel functional test surveillance interval.

BAW-10167 assumed monthly functional tests for the reactor trip modules (RTM), reactor trip breakers, and electronic (SCR) trip. In June, 1986 when BAW-10167 was submitted, the SCR trip was not included in the DBNPS TS. The SCR trip was added to the DBNPS TS by Amendment Number 108 dated March 2, 1988. By letter dated March 27, 1987 (Serial Number 1312), Toledo Edison requested Amendment Number 108 in response to NRC Generic Letter 85-10, Technical Specifications for Generic Letter 83-28, Items 4.3 and 4.4, dated May 23, 1985 (Log Number 1756). Generic Letter 85-10 recommended an 18 month interval channel functional tests for the SCR trip for the Davis-Besse class of plants. This surveillance interval was incorporated in the DBNPS TS for the SCR trip. The 18 month interval SCR channel functional test at the DBNPS individually verifies the operation of each SCR.

The monthly testing assumption for the SCR trip in BAW-10167 was based on the fact that the SCR trip is exercised monthly as part of the reactor trip breaker functional test. The SCR trip functions by the opening of relay contacts in the control rod drive system (CRDS) programmer lamp circuits. This removes the gating signals from the SCRs. The relays are the only electromechanical component involved in the SCR trip. The opening of the contacts is verified by the illumination of the control room programmer lamp fault light as part of the monthly RTM channel functional test. However, the control room



programmer lamp fault light will illuminate if any of the contacts for any control rod groups programmer opens. The monthly RTB functional test procedure will be revised to require individual verification of all programmer lamp fault indicators at the CRDS group power supply cabinets prior to utilizing the increased channel functional intervals proposed by this license amendment request. This action will verify the electromechanical portion of the SCR trip on a monthly basis and is consistent with the degree of monthly functional testing of the SCR trip assumed by BAW-10167.

With the changes to the RTB functional test procedure, adjustments to field setpoints and test acceptance criteria noted above, Toledo Edison concludes that the changes proposed by BAW-10167 and approved by the NRC are applicable to the DBNPS and safe to implement.

Change 3)

A new Action 10 is added to Table 3.3-1 which is applicable to functional units 2 through 9. Action 10 permits continued operation for 48 hours with two of four channels inoperable (one in trip and the other in bypass). Currently, the TS are inadequate for the condition where two channels are inoperable. If this situation were to occur, TS 3.0.3 would be invoked. TS 3.0.3 requires that a plant shutdown be initiated within one hour. As noted in NRC SER for BAW-10167, one hour is too short a time interval in which to initiate any reasonable repair action. The proposed Action 10 would permit a reasonable time period to restore one inoperable channel to operable status and avoid an otherwise unwarranted plant shutdown. The need for a reasonable repair time is recognized in the Restructured Technical Specifications for B&W Plants, from which the proposed Action 10 was adopted. In the condition allowed by Action 10, the plant would remain protected for postulated transients and accidents with the RPS operating as a one-out-of-two trip system. It is expected that Action 10 would be used infrequently.

Change 4)

The channel functional test interval for functional unit 10, intermediate range neutron flux and rate instrumentation, is revised from "S/U(5)(1)" (prior to reactor startup with Notes (1) and (5) applying) to "N.A.", and the channel functional test interval for functional unit 11, source range neutron flux and rate instrumentation, is revised from "M and S/U(1)(5)" (monthly while in Modes 2 through 5 and prior to reactor startup with Notes (1) and (5) applying) to "N.A.". Although these surveillance requirements technically are required only prior to startup, and monthly for the source range instruments while the plant is shutdown, the channel functional test is performed monthly even during normal power operation to assure that the surveillance requirements are always current in the event the plant is experiences a reactor trip or unplanned shutdown. Toledo Edison notes that the B&W RSTS eliminate the channel functional tests for source and intermediate range instrumentation on the basis that they perform only a monitoring function except for control rod withdrawal inhibit which

is only required during low power physics testing. For instrumentation that performs a monitoring function, the RSTS consider 18 month interval channel calibrations and channel checks each shift to be the appropriate surveillance requirements. As in the RSTS, the control rod withdrawal inhibit function is verified by surveillance requirement 4.10.2.2 when Special Test Exception 3.10.2, Physics Tests, is invoked. Toledo Edison considers that the proposed surveillance requirements are commensurate with the function performed by the source and intermediate range neutron flux instrumentation. Accordingly, the revised surveillance requirements have no adverse impact on safety.

Change 5)

The channel calibration interval for Table 4.3-1, functional unit 8, High Flux/Number of Reactor Coolant Pumps On, is decreased from "R" (18 months) to "Q(6,9)" (quarterly with Note 6 and 9 applying). Note 6 exempts the neutron detectors from the channel calibration. Note 9 requires the surveillance to be performed on a staggered test basis. The High Flux/Number of Reactor Coolant Pumps On trip uses input from functional unit 2, High Flux, and functional unit 4, Flux -  $\Delta$ Flux - Flow, which are calibrated quarterly. Since functional units 2 and 4 are required to be calibrated more frequently than functional unit 8, the potential exists for adjustments made during the calibration of functional units 2 and 4 to adversely affect the calibration of functional unit 8. Therefore, it is appropriate for functional units 2, 4, and 8 to be calibrated at the same frequency. Since this proposed change reduces the potential for functional unit 8 becoming mis-calibrated, this change will not have an adverse impact on safety.

Change 6)

Corrects a typographical error in the numbering of page 3/4 3-30c and has no impact on safety.

SIGNIFICANT HAZARDS CONSIDERATION

The Nuclear Regulatory Commission has provided standards in 10CFR50.92(c) for determining whether a significant hazard exists due to a proposed amendment to an Operating License for a facility. A proposed amendment involves no significant hazard consideration if operation of the facility in accordance with the proposed changes would: (1) Not involve a significant increase in the probability or consequences of an accident previously evaluated; (2) Not create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) Not involve a significant reduction in a margin of safety. Toledo Edison has reviewed the proposed changes and

determined that a significant hazards consideration does not exist because operation of the Davis-Besse Nuclear Power Station Unit 1 in accordance with these changes would:

- 1a) Not involve a significant increase in the probability of an accident previously evaluated because the proposed changes do not involve design modifications or changes in plant operation which adversely affect the probability of the initiation of previously evaluated accidents. The Reactor Protection System (RPS) and Anticipatory Reactor Trip System (ARTS) primarily function to limit fuel damage thereby mitigating the consequences of accidents and transients. However, spurious trips initiate plant transients. The proposed change to permit plant operation to continue indefinitely with an inoperable RPS instrument channel in bypass instead of tripped, reduces the susceptibility of the RPS to spurious reactor trips, thereby reducing their probability of occurrence. The proposed increase in the RPS and ARTS channel functional test interval reduces the number of opportunities for the occurrence of spurious reactor trips during testing. The risk (probability and consequences) impacts of the proposed changes to the surveillance test intervals and allowable out of service times (AOTs) have previously been evaluated by the NRC-approved Babcock and Wilcox (B&W) Topical Report, BAW-10167, "Justification for Increasing the Reactor Trip System On-Line Test Intervals," and its supplements. The NRC review concluded that the proposed surveillance test intervals and AOTs do not contribute an unacceptable increase to overall risk. The proposed decrease in the channel calibration interval for the RPS High Flux/Number of Reactor Coolant Pumps On trip makes the calibration interval consistent with the RPS High Flux and Flux  $\Delta$ Flux - Flow trips and does not affect the probability of an accident.
- 1b) Not involve a significant increase in the consequences of an accident previously evaluated because the proposed changes in RPS and ARTS channel functional test intervals and AOTs continue to ensure high reliability of the RPS/ARTS in limiting fuel damage and, therefore, the consequences of previously evaluated accidents. The risk (probability and consequences) impacts of the proposed changes to the surveillance test intervals and AOTs have previously been evaluated by the NRC-approved Babcock and Wilcox (B&W) Topical Report, BAW-10167, "Justification for Increasing the Reactor Trip System On-Line Test Intervals," and its supplements. The NRC review concluded that the proposed surveillance test intervals and AOTs do not make an unacceptable contribution to overall risk. The proposed decrease in the channel calibration interval for the RPS High Flux/Number of Reactor Coolant Pumps On trip makes the calibration interval consistent with the RPS High Flux and Flux  $\Delta$ Flux - Flow trips and continues to ensure high reliability of this RPS trip in performing its intended function. Therefore, the consequences of previously evaluated accidents are unaffected by this change.

- 2a) Not create the possibility of a new kind of accident from any accident previously evaluated because there are no design modifications or hardware changes proposed. Furthermore, there are no new equipment failure modes or mechanisms introduced by the proposed changes.
- 2b) Not create the possibility of a different kind of accident from any accident previously evaluated because there are no design modifications or hardware changes proposed. Furthermore, there are no different failure modes or mechanisms introduced by the proposed changes.
- 3) Not involve a significant reduction in a margin of safety since the revised Technical Specifications surveillance intervals and allowed out of service times will continue to ensure high reliability of RPS and ARTS in performing their intended functions.

#### CONCLUSION

On the basis of the above, Toledo Edison has determined that the License Amendment Request does not involve a significant hazards consideration. As this License Amendment Request concerns a proposed change to the Technical Specifications that must be reviewed by the Nuclear Regulatory Commission, this License Amendment Request does not constitute an unreviewed safety question.

#### ATTACHMENT

Attached are the proposed marked-up changes to the Operating License.