

ATTACHMENT 1

Proposed Zion Appendix A  
Technical Specification Changes To  
To Section 3.1  
Reactor Protection System Instrumentation and Logic

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<u>Reactor Trip Channel Description</u>	<u>Channel Check</u>	<u>Channel Calibration</u>	<u>Channel Functional Test</u>	<u>Remarks</u>
17. Low Steam Generator Level in Coincidence with Feed Flow Steam Flow Mismatch	S	R	Q	
18. Low-Low Steam Generator Level	S	R	Q	
19. Safety Injection	NA	NA	Q*	* Manual SI function check at R only
20. Turbine Trip	NA	NA	Q	
21. Automatic Reactor Trip Logic	NA	NA	M*	* Including testing of the reactor trip breaker shunt and undervoltage trip mechanisms.
<u>PERMISSIVES</u>				
22. P-6	NA	NA	S/U <sup>10</sup>	<sup>10</sup> Not required if performed within the previous seven days
23. P-7	NA	NA	M	
24. P-8	NA	NA	M	
25. P-10	NA	NA	M	

Table Notation:

S - Once Per Shift

D - Once Per Day

M - Once Per Month

R - Once Per Refueling Shutdown

EFPM - Once Per Effective Full Power Month

Q - Once Per Quarter

S/U - Prior to Startup

- calibration of these instruments may be done as much as six months prior to the start of refueling outage and still satisfy this requirement. The time between surveillances shall not exceed 20 months.

NA - Not Applicable

Reactor Protection System Testing and Calibration Requirements

TABLE 4.1-1 (Sheet 2 of 2)

#### Bases:

4.1 The bases for Tables 3.1-1 and 4.1-1 is an analysis of the reactor protection and control instrumentation systems. Conservative failure rates for the individual channels were employed based on published data typical for individual components in the channels. The test and calibration frequencies are therefore quite conservative.

Considerable added conservatism is inherent in the analysis since no credit was established for the fact that there exists a wide margin of diversity in trip signal origin. (1) Should a situation develop which would require a trip,

such signals would generally be originated by more than one functional unit. Therefore, from the standpoint of accomplishing the required trip or actuation, far greater redundancy exists than is credited in establishing the specification tables.

The Power Range Neutron Flux (Low Setpoint) channel function test is not performed continually above 25% power levels due to the possibility of inducing inadvertent reactor trips. This trip is a redundant trip at low power and the test is to be performed at startup and as soon as is practical on controlled shutdown if the power is to remain at low levels (below 10%) for any extended periods of time.

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(1) FSAR Section 7.2

## ATTACHMENT 2

### Evaluation of Significant Hazards Consideration

#### Description of Amendment Request

An amendment to the Technical Specification is requested adding clarification to the automatic reactor trip logic testing requirements in accordance with Generic Letter 83-28. The proposed amendment applies to a plant modification scheduled to be installed during the 1985 refueling outages started January 30, 1985 for Unit 1 and scheduled to start September 5, 1985 for Unit 2.

#### Basis for Proposed No Significant Hazards Consideration Determination

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870). The examples of actions involving no significant hazards consideration include: "(ii) A change that constitutes an additional limitation restriction, or control not presently included in the technical specifications; for example, a more stringent surveillance requirement." The change proposed in the application for amendment is encompassed by this example in that it would clarify an existing surveillance requirement to indicate testing of the reactor trip breaker shunt and undervoltage trip mechanisms is to be performed.

Therefore, since the application for amendment involves a proposed change that is similar to an example for which no significant hazards consideration exists, Commonwealth Edison has made a proposed determination that the application involves no significant hazards consideration.