

ATTACHMENT A

TECHNICAL SPECIFICATION CHANGE REQUEST

LASALLE COUNTY STATION UNIT 1

SUBJECT: Extension of a Limited Number of 18 Month Interval Surveillance Requirements for First Refuel

The Technical Specifications require many surveillance tests to be performed every 18 months (plus a maximum extension defined by specification 4.0.2). To adequately utilize the core (i.e., attain at least the minimum exposure interval for Cycle 1), to allow completion of parts procurement and design review for license conditions and other plant modifications and to factor in Commonwealth Edison system considerations which may arise, Commonwealth Edison requests approval for a one-time-only waiver of a limited number of 18-month frequency Technical Specifications surveillance requirements for Cycle 1, provided the surveillance is performed during the first refueling outage. The Technical Specification requirements which are requested to be waived are specified on the following pages. All other surveillance schedules for the planned Fall 1985 outage were completed during unscheduled outages during Cycle 1.

The surveillances requested to be waived require a plant shutdown or a plant shutdown results from the surveillance. All daily, monthly and quarterly surveillances have been and will continue to be performed as required.

The 18 month surveillance interval was selected to be consistent with the maximum anticipated interval between refueling outages. Specification 4.0.2 allows an extension to this 18 month frequency to accommodate operations scheduling. However this extension (25%) is limited to a maximum of  $3.25 \times 18$  months for 3 consecutive surveillance intervals. The "due date" indicated includes this allowed extension. The end of the most limiting surveillance interval, including the allowable 25% extension, is September 22, 1985. Refuel 1 is expected to commence on or before October 27, 1985. The period of plant operation during the requested extensions, therefore, is a maximum of 36 days.

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The LaSalle County Station Unit 1 has been through an extended startup program and has been shutdown several times for equipment failure, feedwater check valve problems, environmental qualification upgrade, etc throughout the first cycle (Cycle 1). Even though this unit has shutdown to perform "refueling" surveillances during mid-cycle before (including the surveillances listed on the following pages) these surveillances again come due before the optimum start of the actual refueling outage. We have concluded, based on a review of past surveillance records that these tests were satisfactory during the previous performance and therefore there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner. The systems, valves, or instruments will not degrade unacceptably if these selected surveillance intervals are extended to October 27, 1985.

# 1. Logic/Functional Testing

<u>Specification</u>	<u>Description</u>	<u>Due Date</u>
4.3.1.2	Reactor Protection System (RPS)	9/28/85
Table 4.3.3.1-1 4.3.3.2	Low Pressure Coolant Injection	9/27/85
4.3.4.1.2	ATWS-RPT	9/30/85
4.3.4.2.2	EOC-RPT	9/30/85
Table 4.3.7.11-1	Off-Gas Post Treatment Monitor	10/12/85
4.3.8.2	Feedwater/Main Turbine High Level Trip	10/20/85
4.4.2.2	Low-Low Setpoint	10/08/85
4.6.1.4.c	MSIV Leakage Control	10/06/85
4.8.3.3.1	Thermal Overload Bypass-RHR Valves	10/08/85*

There is no safety significance to delaying these tests for a short period of time. All of the above systems have functional tests and/or calibrations which are within their Tech Spec surveillance frequency. These functional or calibration tests verify operability of the instrumentation and/or components of which this logic system is a part. In many cases these tests cover the majority of the logic system. (For

example all channels of RPS are half scram tested monthly except the mode switch in shutdown position scram). The testing performed to meet the above specification generally entails verification that all portions work together. The result of this testing however requires actuation of systems in a mode which is not possible during normal power operation. Since the parts of the systems which are more likely to fail (valves, instruments, etc) are verified operable by current surveillances during the extension period, no impact on plant safety will occur.

\* - For non-primary containment automatic isolation valves bypassed under accident conditions.

2. Pressure Isolation Valves-Specification 4.4.3.2 (Table 3.4.3.2-1)

<u>VALVE NUMBER</u>	<u>TYPE</u>	<u>DUE</u>	<u>FUNCTION</u>
1E12-F042B	Gate	9/22/85	LPCI B Injection
1E12-F042C	Gate	9/22/85	LPCI C Injection
1E12-F053B	Globe	9/22/85	Shutdown Cooling Return B
1E21-F005	Gate	9/22/85	LPCS Injection

A redundant valve in each line listed above will remain within the Tech Spec surveillance interval. No valves listed are check valves. Gate and Globe valves have had a good history of meeting the leakage rate requirements. Alarms monitor the low pressure piping to ensure any leakage is detected (alarm function is tested every 31 days). All valves were last left with zero leakage. These valves cannot be tested with the reactor vessel at pressure. The test also requires access to the drywell which is inerted.

3. Calibrations

<u>Specification</u>	<u>Description</u>	<u>Due Date</u>
a. Table 4.3.1.1-1-10	Turbine Control Valve Pressure Switches	10/6/85
b. 4.4.3.1.b	Prim Cont. Floor Drain Sump Flow Monitoring	10/6/85
c. 4.8.3.2 Table 3.8.3.2-1 b)	Prim Cont. Overcurrent Protection 480V	9/25/85

The items (except c) listed above receive periodic functional testing to ensure the ability of the system to operate if required. Item c is protected by wiring which is sized to fail prior to the electrical penetration. Also, for item c only 10% are required to be tested each interval yet since there are only two breakers to be tested 1 of 2 are tested each 18 months which exceeds the Tech Spec requirement. All devices were found within acceptable limits at the last surveillance.

Item a: Requires that the turbine control oil system be shutdown and requires access to the main turbine control valves. The turbine control oil system cannot be secured if the turbine is on line or if the bypass valves are passing steam. Therefore, the unit would have to shutdown to critical behind the MSIVs to perform this test.

Item b: To perform this calibration requires access to the drywell (inerted).

Item c: To perform this test the primary containment ventilation fans would need to be shutdown which would cause excessive drywell temperatures.

#### 4. Electric Power Source

- a. Specification 4.8.1.1.2.d. These diesel tests are done normally while shutdown during refueling (required by Tech Specs). They are included in the testing program to ensure that periodically certain functions have not degraded. These tests include logic testing, preventative maintenance, etc. The diesel generators are verified to be operable while in operation by performing several surveillances required by specifications 4.8.1.1.2.a, b and c. This ensures that the diesel will start, will accept load and has available such auxiliaries as necessary. This applies to Divisions II and III only. All Division I testing will remain within the required interval. Due 10/2/85 - Div. III, 10/10/85 - Div. II.
- b. Division III battery service test Specification 4.8.2.3.2.d.2.c - This test only verifies that the battery still has sufficient capacity by actual testing. However verification that battery gravities and voltages are proper assures that the battery will be available if required. This slight delay does not affect battery availability. Technical Specification requires shutdown to perform this surveillance. Due 9/25/85.

5. Others

- a. Specification 4.1.5.c.1 - Injection of Standby Liquid Control System into the reactor vessel using demineralized water. Verification of pump operability is still maintained through other current surveillances. This test only verifies the flow path to the reactor vessel. This test would make Standby Liquid Control inoperable. Due 10/20/85.
- b. Performance of a leak test required by Table 3.6.3-1 note (j) for valves 1B33-F013A,B and 1B33-F017A,B. This is a water leak test to verify that these check valves are able to close. These lines are small (3/4") which provides seal injection water to the recirculation pumps from the CRD System. This test requires access to drywell. Due 9/26/85.
- c. Specification 4.1.3.1.4.a - Timing of Scram discharge volume vent and drain valves during reactor scram. Vent and Drain valves are tested (timed) quarterly per Tech Spec 4.1.3.1.1 and 4.0.5 to ensure times are within tolerance. Requires scram to perform. Due 10/20/85.



ATTACHMENT B

PROPOSED CHANGE TO APPENDIX A

TECHNICAL SPECIFICATIONS TO OPERATING LICENSE

NPF-11

Revised Pages:

NPF-11

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Insert (A)

The specified 18 month interval may be waived for Cycle 1 provided the surveillance is performed during Refuel 1.

## REACTIVITY CONTROL SYSTEM

### SURVEILLANCE REQUIREMENTS (Continued)

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4.1.3.1.4 The scram discharge volume shall be determined OPERABLE by demonstrating:

- a. The scram discharge volume drain and vent valves OPERABLE, when control rods are scram tested from a normal control rod configuration of less than or equal to 50% ROD DENSITY at least once per 18 months\* by verifying that the drain and vent valves: \*\*
  1. Close within 30 seconds after receipt of a signal for control rods to scram, and
  2. Open after the scram signal is reset.
- b. Proper float response by performance of a CHANNEL FUNCTIONAL TEST of the scram discharge volume scram and control rod block level instrumentation after each scram from a pressurized condition.

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\*The provisions of Specification 4.0.4 are not applicable for entry into OPERATIONAL CONDITION 2 provided the surveillance is performed within 12 hours after achieving less than or equal to 50% ROD DENSITY.

\*\* insert (A)



## REACTIVITY CONTROL SYSTEM

### SURVEILLANCE REQUIREMENTS (Continued)

b. At least once per 31 days by;

1. Starting both pumps and recirculating demineralized water to the test tank.
2. Verifying the continuity of the explosive charge.
3. Determining that the concentration of boron in solution is within the limits of Figure 3.1.5-2 by chemical analysis.\*
4. Verifying that each valve in the flow path that is not locked, sealed or otherwise secured in position, is in its correct position.

c. At least once per 18 months during shutdown by;

1. Initiating one of the standby liquid control system loops, including an explosive valve, and verifying that a flow path from the pumps to the reactor pressure vessel is available by pumping demineralized water into the reactor vessel. The replacement charge for the explosive valve shall be from the same manufactured batch as the one fired or from another batch which has been certified by having one of that batch successfully fired. Both injection loops shall be tested in 36 months. \*\*\*
2. Demonstrating that when tested pursuant to Specification 4.0.5, the minimum flow requirement of 41.2 gpm at a pressure of greater than or equal to 1220 psig is met.
3. Demonstrating that the pump relief valve setpoint is less than or equal to 1400 psig and verifying that the relief valve does not actuate during recirculation to the test tank.
4. \*\*Demonstrating that all heat traced piping between the storage tank and the reactor vessel is unblocked by verifying flow from the storage tank to the motor operated suction valve and then draining and flushing the piping with demineralized water.
5. Demonstrating that the storage tank heaters are OPERABLE by verifying the expected temperature rise for the sodium pentaborate solution in the storage tank after the heaters are energized.

\*This test shall also be performed anytime water or boron is added to the solution or when the solution temperature drops below the limit of Figure 3.1.5-1.

\*\*This test shall also be performed whenever the heat tracing circuit has been found to be inoperable and may be performed by any series of sequential, overlapping or total flow path steps such that the entire flow path is included.

### 3/4.3 INSTRUMENTATION

#### 3/4.3.1 REACTOR PROTECTION SYSTEM INSTRUMENTATION

##### LIMITING CONDITION FOR OPERATION

3.3.1 As a minimum, the reactor protection system instrumentation channels shown in Table 3.3.1-1 shall be OPERABLE with the REACTOR PROTECTION SYSTEM RESPONSE TIME as shown in Table 3.3.1-2.

APPLICABILITY: As shown in Table 3.3.1-1.

##### ACTION:

- a. With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip System requirement for one trip system, place that trip system in the tripped condition\* within 1 hour. The provisions of Specification 3.0.4 are not applicable.
- b. With the the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip System requirement for both trip systems, place at least one trip system\*\* in the tripped condition within 1 hour and take the ACTION required by Table 3.3.1-1.

##### SURVEILLANCE REQUIREMENTS

4.3.1.1 Each reactor protection system instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations for the OPERATIONAL CONDITIONS and at the frequencies shown in Table 4.3.1.1-1.

4.3.1.2 LOGIC SYSTEM FUNCTIONAL TESTS and simulated automatic operation of all channels shall be performed at least once per 18 months. \*\*\*

4.3.1.3 The REACTOR PROTECTION SYSTEM RESPONSE TIME of each reactor trip functional unit shown in Table 3.3.1-2 shall be demonstrated to be within its limit at least once per 18 months. Each test shall include at least one channel per trip system such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific reactor trip system.

\* With a design providing only one channel per trip system, an inoperable channel need not be placed in the tripped condition where this would cause the Trip Function to occur. In these cases, the inoperable channel shall be restored to OPERABLE status within 2 hours or the ACTION required by Table 3.3.1-1 for that Trip Function shall be taken.

\*\* If more channels are inoperable in one trip system than in the other, select that trip system to place in the tripped condition, except when this would cause the Trip Function to occur.

\*\*\* insert (A)

TABLE 4.3.1.1-1 (Continued)

REACTOR PROTECTION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL FUNCTIONAL TEST</u>	<u>CHANNEL CALIBRATION</u>	<u>OPERATIONAL CONDITIONS FOR WHICH SURVEILLANCE REQUIRED</u>
8. Scram Discharge Volume Water Level - High	NA	M	R	1, 2, 5
9. Turbine Stop Valve - Closure	NA	M	R	1
10. Turbine Control Valve Fast Closure Valve Trip System Oil Pressure - Low	NA	M	R *	1
11. Reactor Mode Switch Shutdown Position	NA	R	NA	1, 2, 3, 4, 5
12. Manual Scram	NA	M	NA	1, 2, 3, 4, 5

- (a) Neutron detectors may be excluded from CHANNEL CALIBRATION.
- (b) The IRM, and SRM channels shall be determined to overlap for at least 1/2 decades during each startup and the IRM and APRM channels shall be determined to overlap for at least 1/2 decades during each controlled shutdown, if not performed within the previous 7 days.
- (c) Within 24 hours prior to startup, if not performed within the previous 7 days.
- (d) This calibration shall consist of the adjustment of the APRM channel to conform to the power values calculated by a heat balance during OPERATIONAL CONDITION 1 when THERMAL POWER > 25% of RATED THERMAL POWER. Adjust the APRM channel if the absolute difference is greater than 2%. Any APRM channel gain adjustment made in compliance with Specification 3.2.2 shall not be included in determining the absolute difference.
- (e) This calibration shall consist of the adjustment of the APRM flow biased channel to conform to a calibrated flow signal.
- (f) The LPRMs shall be calibrated at least once per 1000 effective full power hours (EFPH) using the TIP system.
- (g) Measure and compare core flow to rated core flow.
- (h) This calibration shall consist of verifying the  $6 \pm 1$  second simulated thermal power time constant.

\* insert (A)

## INSTRUMENTATION

### 3/4.3.3 EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION

#### LIMITING CONDITION FOR OPERATION

3.3.3 The emergency core cooling system (ECCS) actuation instrumentation channels shown in Table 3.3.3-1 shall be OPERABLE with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3.3-2 and with EMERGENCY CORE COOLING SYSTEM RESPONSE TIME as shown in Table 3.3.3-3.

APPLICABILITY: As shown in Table 3.3.3-1.

#### ACTION:

- a. With an ECCS actuation instrumentation channel trip setpoint less conservative than the value shown in the Allowable Values column of Table 3.3.3-2, declare the channel inoperable until the channel is restored to OPERABLE status with its trip setpoint adjusted consistent with the Trip Setpoint value.
- b. With one or more ECCS actuation instrumentation channels inoperable, take the ACTION required by Table 3.3.3-1.
- c. With either ADS trip system "A" or "B" inoperable, restore the inoperable trip system to OPERABLE status within:
  1. 7 days, provided that the HPCS and RCIC systems are OPERABLE.
  2. 72 hours.

Otherwise, be in at least HOT SHUTDOWN within the next 12 hours and reduce reactor steam dome pressure to less than or equal to 122 psig within the following 24 hours.

#### SURVEILLANCE REQUIREMENTS

4.3.3.1 Each ECCS actuation instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations for the OPERATIONAL CONDITIONS and at the frequencies shown in Table 4.3.3.1-1.

4.3.3.2 LOGIC SYSTEM FUNCTIONAL TESTS and simulated automatic operation of all channels shall be performed at least once per 18 months. \*

4.3.3.3 The ECCS RESPONSE TIME of each ECCS trip function shown in Table 3.3.3-3 shall be demonstrated to be within the limit at least once per 18 months. Each test shall include at least one channel per trip system such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific ECCS trip system.

\* insert (A), for LPCI A, B, and C.



TABLE 4.3.3.1-1

EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>TRIP FUNCTION</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL FUNCTIONAL TEST</u>	<u>CHANNEL CALIBRATION</u>	<u>OPERATIONAL CONDITIONS FOR WHICH SURVEILLANCE REQUIRED</u>
<u>A. DIVISION I TRIP SYSTEM</u>				
<u>1. RHR-A (LPCI MODE) AND LPCS SYSTEM</u>				
a. Reactor Vessel Water Level - Low Low Low, Level 1	NA	M	R	1, 2, 3, 4*, 5*
b. Drywell Pressure - High	NA	M	Q	1, 2, 3
c. LPCS Pump Discharge Flow-Low	NA	M	Q	1, 2, 3, 4*, 5*
d. LPCS and LPCI A Injection Valve Injection Line Pressure Low Interlock	NA	M	R	1, 2, 3, 4*, 5*
e. LPCS and LPCI A Injection Valve Reactor Pressure Low Interlock	NA	M	R	1, 2, 3, 4*, 5*
f. LPCI Pump A Start Time Delay Relay	NA	M	Q	1, 2, 3, 4*, 5*
g. LPCI Pump A Flow-Low	NA	M	Q	1, 2, 3, 4*, 5*
h. Manual Initiation	NA	R *	NA	1, 2, 3, 4*, 5*
<u>2. AUTOMATIC DEPRESSURIZATION SYSTEM TRIP SYSTEM "A"*</u>				
a. Reactor Vessel Water Level - Low Low Low, Level 1	NA	M	R	1, 2, 3
b. Drywell Pressure-High	NA	M	Q	1, 2, 3
c. ADS Timer	NA	M	Q	1, 2, 3
d. Reactor Vessel Water Level - Low, Level 3	NA	M	R	1, 2, 3
e. LPCS Pump Discharge Pressure-High	NA	M	Q	1, 2, 3
f. LPCI Pump A Discharge Pressure-High	NA	M	Q	1, 2, 3
g. Manual Initiation	NA	R	NA	1, 2, 3

\* insert (A)



TABLE 4.3.3.1-1 (Continued)

EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>TRIP FUNCTION</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL FUNCTIONAL TEST</u>	<u>CHANNEL CALIBRATION</u>	<u>OPERATIONAL CONDITIONS FOR WHICH SURVEILLANCE REQUIRED</u>
<b>B. <u>DIVISION 2 TRIP SYSTEM</u></b>				
<b>1. <u>RHR B AND C (LPCI MODE)</u></b>				
a. Reactor Vessel Water Level - Low Low Low, Level 1	NA	M	R	1, 2, 3, 4*, 5*
b. Drywell Pressure - High	NA	M	Q	1, 2, 3
c. LPCI B and C Injection Valve Injection Line Pressure Low Interlock	NA	M	R	1, 2, 3, 4*, 5*
d. LPCI Pump B Start Time Delay Relay	NA	M	Q	1, 2, 3, 4*, 5*
e. LPCI Pump Discharge Flow-Low	NA	M	Q	1, 2, 3, 4*, 5*
f. Manual Initiation	NA	R	NA	1, 2, 3, 4*, 5*
g. LPCI B and C Injection Valve Reactor Pressure Low Interlock	NA	M	R	1, 2, 3, 4*, 5*
<b>2. <u>AUTOMATIC DEPRESSURIZATION SYSTEM TRIP SYSTEM "B"*</u></b>				
a. Reactor Vessel Water Level - Low Low Low, Level 1	NA	M	R	1, 2, 3
b. Drywell Pressure-High	NA	M	Q	1, 2, 3
c. ADS Timer	NA	M	Q	1, 2, 3
d. Reactor Vessel Water Level - Low, Level 3	NA	M	R	1, 2, 3
e. LPCI Pump B and C Discharge Pressure-High	NA	M	Q	1, 2, 3
f. Manual Initiation	NA	R	NA	1, 2, 3

\* insert (A)

## INSTRUMENTATION

### 3/4.3.4 RECIRCULATION PUMP TRIP ACTUATION INSTRUMENTATION

#### ATWS RECIRCULATION PUMP TRIP SYSTEM INSTRUMENTATION

#### LIMITING CONDITION FOR OPERATION

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3.3.4.1 The anticipated transient without scram recirculation pump trip (ATWS-RPT) system instrumentation channels shown in Table 3.3.4.1-1 shall be OPERABLE with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3.4.1-2.

APPLICABILITY: OPERATIONAL CONDITION 1.

#### ACTION:

- a. With an ATWS recirculation pump trip system instrumentation channel trip setpoint less conservative than the value shown in the Allowable Values column of Table 3.3.4.1-2, declare the channel inoperable until the channel is restored to OPERABLE status with its trip setpoint adjusted consistent with the Trip Setpoint value.
- b. With the number of OPERABLE channels one less than required by the Minimum OPERABLE Channels requirement for one trip function in one trip system, restore the inoperable channel to OPERABLE status within 14 days or be in at least STARTUP within the next 8 hours.

#### SURVEILLANCE REQUIREMENTS

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4.3.4.1.1 Each ATWS recirculation pump trip system instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3.4.1-1.

4.3.4.1.2 LOGIC SYSTEM FUNCTIONAL TESTS and simulated automatic operation of all channels shall be performed at least once per 18 months. \*

\* insert (A)

## INSTRUMENTATION

### SURVEILLANCE REQUIREMENTS

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4.3.4.2.1 Each end-of-cycle recirculation pump trip system instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3.4.2.1-1.

4.3.4.2.2 LOGIC SYSTEM FUNCTIONAL TESTS and simulated automatic operation of all channels shall be performed at least once per 18 months. \*

4.3.4.2.3 The END-OF-CYCLE RECIRCULATION PUMP TRIP SYSTEM RESPONSE TIME of each trip function shown in Table 3.3.4.2-3 shall be demonstrated to be within its limit at least once per 18 months. Each test shall include at least the logic of one type of channel input, turbine control valve fast closure or turbine stop valve closure, such that both types of channel inputs are tested at least once per 36 months. The time allotted for breaker arc suppression shall be verified by test at least once per 60 months.

\* insert (A)

TABLE 4.3.7.11-1

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>INSTRUMENT</u>	<u>CHANNEL CHECK</u>	<u>SOURCE CHECK</u>	<u>CHANNEL FUNCTIONAL TEST</u>	<u>CHANNEL CALIBRATION</u>	<u>OPERATIONAL CONDITIONS FOR WHICH SURVEIL- LANCE REQUIRED</u>
1. MAIN CONDENSER OFFGAS TREATMENT SYSTEM EFFLUENT MONITORING SYSTEM					
a. Noble Gas Activity Monitor - Providing Alarm and Automatic Termination of Release	D	D	Q(1)	R(3) ***	*
2. MAIN CONDENSER OFFGAS TREATMENT SYSTEM EXPLOSIVE GAS MONITORING SYSTEM					
a. Hydrogen Monitor	D	N.A.	M	Q(4)	**
3. MAIN STACK MONITORING SYSTEM					
a. Noble Gas Activity Monitor	D	M	Q(5)	R(3)	*
b. Iodine Sampler	W	N.A.	N.A.	N.A.	*
c. Particulate Sampler	W	N.A.	N.A.	N.A.	*
d. Effluent System Flow Rate Monitor	D	N.A.	Q	R	*
e. Sampler Flow Rate Monitor	D	N.A.	Q	R	*
4. CONDENSER AIR EJECTOR RADIOACTIVITY MONITOR					
a. Noble Gas Activity Monitor	D	M	Q(2)	R(3)	#
5. SBGTS MONITORING SYSTEM					
a. Noble Gas Activity Monitor	D	M	Q(5)	R(3)	##
b. Iodine Sampler	W	N.A.	N.A.	N.A.	##
c. Particulate Sampler	W	N.A.	N.A.	N.A.	##
d. Effluent System Flow Rate Monitor	D	N.A.	Q	R	##
e. Sampler Flow Rate Monitor	D	N.A.	Q	R	##

## INSTRUMENTATION

TABLE 4.3.7.11-1 (Continued)

### TABLE NOTATION

- \* At all times.
  - \*\* During main condenser offgas treatment system operation.
  - # During operation of the main condenser air ejector. ← \*\*\* insert (A)
  - ## During operation of the SBGTS.
- (1) The CHANNEL FUNCTIONAL TEST shall also demonstrate the automatic isolation capability of this pathway, and that control room alarm annunciation occurs if any of the following conditions exists: (each channel will be tested independently so as not to initiate automatic isolation during operation).
1. Instrument indicates measured levels above the alarm/trip setpoint.
  2. Loss of power.
  3. Instrument alarms on downscale failure.
  4. Instrument controls not set in Operate or High Voltage mode. (Automatic isolation shall be demonstrated during the CHANNEL CALIBRATION.)
- (2) The CHANNEL FUNCTIONAL TEST for the log scale monitor shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:
1. Instrument indicates measured levels above the alarm setpoint.
  2. Loss of power.
  3. Instrument alarms on downscale failure.
  4. Instrument controls not set in Operate or High Voltage mode.
- (3) The initial CHANNEL CALIBRATION shall be performed using one or more of the reference radioactive standards certified by the National Bureau of Standards (NBS) or using standards that have been obtained from suppliers that participate in measurement assurance activities with NBS. These standards shall permit calibrating the system over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, the initial reference radioactive standards or radioactive sources that have been related to the initial calibration shall be used.
- (4) The CHANNEL CALIBRATION shall include the use of standard gas samples containing a nominal:
1. One volume percent hydrogen, balance nitrogen, and
  2. Four volume percent hydrogen, balance nitrogen.
- (5) The CHANNEL FUNCTIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:
1. Instrument indicates measured levels above the alarm setpoint.
  2. Circuit failure.
  3. Instrument controls not set in the Operate mode.



## INSTRUMENTATION

### 3/4.3.8 FEEDWATER/MAIN TURBINE TRIP SYSTEM ACTUATION INSTRUMENTATION

#### LIMITING CONDITION FOR OPERATION

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3.3.8 The feedwater/main turbine trip system actuation instrumentation channels shown in Table 3.3.8-1 shall be OPERABLE with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3.8-2.

APPLICABILITY: OPERATIONAL CONDITION 1.

#### ACTION:

- a. With a feedwater/main turbine trip system actuation instrumentation channel trip setpoint less conservative than the value shown in the Allowable Values column of Table 3.3.8-2, declare the channel inoperable and either place the inoperable channel in the tripped condition until the channel is restored to OPERABLE status with its trip setpoint adjusted consistent with the Trip Setpoint value, or declare the associated system inoperable.
- b. With the number of OPERABLE channels one less than required by the Minimum OPERABLE Channels per Trip System requirement, restore the inoperable channel to OPERABLE status within 7 days or be in at least STARTUP within the next 6 hours.
- c. With the number of OPERABLE channels two less than required by the Minimum OPERABLE Channels per Trip System requirement, restore at least one of the inoperable channels to OPERABLE status within 72 hours or be in at least STARTUP within the next 6 hours.

#### SURVEILLANCE REQUIREMENTS

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4.3.8.1 Each feedwater/main turbine trip system actuation instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3.8.1-1.

4.3.8.2 LOGIC SYSTEM FUNCTIONAL TESTS and simulated automatic operation of all channels shall be performed at least once per 18 months. ★

\* insert (A)

## REACTOR COOLANT SYSTEM

### 3/4.4.2 SAFETY/RELIEF VALVES

#### LIMITING CONDITION FOR OPERATION

3.4.2 The safety valve function of eighteen reactor coolant system safety/relief valves shall be OPERABLE with the specified code safety valve function lift settings.\*

- a. 4 safety/relief valves @ 1205 psig  $\pm$  1%
- b. 4 safety/relief valves @ 1195 psig  $\pm$  1%
- c. 4 safety/relief valves @ 1185 psig  $\pm$  1%
- d. 4 safety/relief valves @ 1175 psig  $\pm$  1%
- e. 2 safety/relief valves @ 1146 psig  $\pm$  1%

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2 and 3.

#### ACTION:

- a. With the safety valve function of one or more of the above required safety/relief valves inoperable, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.
- b. With one or more safety/relief valves stuck open, provided that suppression pool average water temperature is less than 110°F, close the stuck open relief valve(s); if unable to close the open valve(s) within 2 minutes or if suppression pool average water temperature is 110°F or greater, place the reactor mode switch in the Shutdown position.
- c. With one or more safety/relief valve stem position indicators inoperable, restore the inoperable stem position indicators to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

#### SURVEILLANCE REQUIREMENTS

4.4.2.1 The safety/relief valve stem position indicators of each safety/relief valve shall be demonstrated OPERABLE by performance of a:

- a. CHANNEL CHECK at least once per 31 days, and a
- b. CHANNEL CALIBRATION at least once per 18 months.\*\*

4.4.2.2 The low low set function shall be demonstrated not to interfere with the OPERABILITY of the safety relief valves or the ADS by performance of a CHANNEL CALIBRATION at least once per 18 months. \*\*\*

\*The lift setting pressure shall correspond to ambient conditions of the valves at nominal operating temperatures and pressures.

#Up to two inoperable valves may be replaced with spare OPERABLE valves with lower setpoints until the next refueling outage.

\*\*The provisions of Specification 4.0.4 are not applicable provided the surveillance is performed within 12 hours after reactor steam pressure is adequate to perform the test.

\*\*\* insert (A)

## REACTOR COOLANT SYSTEM

### 3/4.4.3 REACTOR COOLANT SYSTEM LEAKAGE LEAKAGE DETECTION SYSTEMS

#### LIMITING CONDITION FOR OPERATION

3.4.3.1 The following reactor coolant system leakage detection systems shall be OPERABLE:

- a. The primary containment atmosphere particulate radioactivity monitoring system,
- b. The primary containment sump flow monitoring system, and
- c. Either the primary containment air coolers condensate flow rate monitoring system or the primary containment atmosphere gaseous radioactivity monitoring system.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2 and 3.

#### ACTION:

With only two of the above required leakage detection systems OPERABLE, operation may continue for up to 30 days provided grab samples of the containment atmosphere are obtained and analyzed at least once per 24 hours when the required gaseous and/or particulate radioactive monitoring system is inoperable; otherwise, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

#### SURVEILLANCE REQUIREMENTS

4.4.3.1 The reactor coolant system detection systems shall be demonstrated OPERABLE by:

- a. Primary containment atmosphere particulate and gaseous monitoring systems-performance of a CHANNEL CHECK at least once per 12 hours, a CHANNEL FUNCTIONAL TEST at least once per 31 days and a CHANNEL CALIBRATION at least once per 18 months.
- b. Primary containment sump flow monitoring system-performance of a CHANNEL FUNCTIONAL TEST at least once per 31 days and a CHANNEL CALIBRATION TEST at least once per 18 months. \*
- c. Primary containment air coolers condensate flow rate monitoring system-performance of a CHANNEL FUNCTIONAL TEST at least once per 31 days and a CHANNEL CALIBRATION at least once per 18 months.

\* insert (A)

TABLE 3.4.3.2-1

REACTOR COOLANT SYSTEM PRESSURE ISOLATION VALVES

<u>SYSTEM</u>	<u>VALVE NUMBER</u>	<u>FUNCTION</u>
a. LPCS	E21-F006	LPCS Injection
	E21-F005 *	LPCS Injection
b. HPCS	E22-F005	HPCS Injection
	E22-F004	HPCS Injection
c. RHR	E12-F041A	LPCI Injection
	E12-F041B	LPCI Injection
	E12-F041C	LPCI Injection
	E12-F042A	LPCI Injection
	E12-F042B *	LPCI Injection
	E12-F042C *	LPCI Injection
	E12-F050A	Shutdown Cooling Return
	E12-F050B	Shutdown Cooling Return
	E12-F053A	Shutdown Cooling Return
	E12-F053B *	Shutdown Cooling Return
	E12-F009	Shutdown Cooling Suction
	E12-F008	Shutdown Cooling Suction
d. RCIC	E51-F066	RCIC Head Spray
	E51-F065	RCIC Head Spray

\* insert (A)



## CONTAINMENT SYSTEMS

### MSIV LEAKAGE CONTROL SYSTEM

#### LIMITING CONDITION FOR OPERATION

---

3.6.1.4 Two independent MSIV leakage control systems (LCS) shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

#### ACTION:

With one MSIV leakage control system inoperable, restore the inoperable system to OPERABLE status within 30 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

#### SURVEILLANCE REQUIREMENTS

---

4.6.1.4 Each MSIV leakage control system shall be demonstrated OPERABLE:

- a. At least once per 31 days by:
  1. Starting the blower(s) from the control room and operating the blower(s) for at least 15 minutes,
  2. Energizing the heaters and verifying a current of 8.28 amperes  $\pm 10\%$  per phase for each heater.
- b. During each COLD SHUTDOWN in accordance with Specification 4.0.5.
- c. At least once per 18 months<sup>\*</sup> by:
  1. Performance of a functional test which includes simulated actuation of the system throughout its operating sequence, and verifying that each automatic valve actuates to its correct position and the blower starts.
  2. Verifying that the blower develops at least the below required vacuum at the rated capacity:
    - a) Inboard valves, 15" H<sub>2</sub>O at 100 scfm.
    - b) Outboard valves, 60" H<sub>2</sub>O at 200 scfm.
- d. By verifying the flow, pressure and, temperature operating instrumentation to be OPERABLE by performance of a:
  1. CHANNEL FUNCTIONAL TEST at least once per 31 days, and
  2. CHANNEL CALIBRATION at least once per 18 months.

\* insert (A)



TABLE 3.6.3-1 (Continued)

PRIMARY CONTAINMENT ISOLATION VALVESVALVE FUNCTION AND NUMBEROther Isolation Valves (Continued)7. Post LOCA Hydrogen Control

1HG001A, B  
 1HG002A, B  
 1HG005A, B  
 1HG006A, B

8. Standby Liquid Control System

1C41-F004A, B  
 1C41-F007

9. Reactor Recirculation Seal Injection \*\*\*

1B33-F013A, B<sup>(j)</sup>  
 1B33-F017A, B<sup>(j)</sup>

10. Drywell Pneumatic System

1IN018

\* But > 3 seconds.

# The provisions of Specification 3.0.4 are not applicable.

(a) See Specification 3.3.2, Table 3.3.2-1, for isolation signal(s) that operates each valve group.

(b) Not included in total sum of Type B and C tests.

(c) May be opened on an intermittent basis under administrative control.

(d) Not closed by SLCS actuation.

(e) Not closed by Trip Functions 5a, b or c, Specification 3.3.2, Table 3.3.2-1.

(f) Not closed by Trip Functions 4a, c, d, e or f of Specification 3.3.2, Table 3.3.2-1.

(g) Not subject to Type C leakage test.

(h) Opens on an isolation signal. Valves will be open during Type A test. No Type C test required.

(i) Also closed by drywell pressure-high signal.

(j) Hydraulic leak test at 43.6 psig.

(k) Not subject to Type C leakage test - leakage rate tested per Specification 4.4.3.2.2.

(l) These penetrations are provided with removable spools outboard of the outboard isolation valve. During operation, these lines will be blind flanged using a double O-ring and a type B leak test. In addition, the packing of these isolation valves will be soap-bubble tested to ensure insignificant or no leakage at the containment test pressure each refueling outage.

\*\* These valves shall have a maximum isolation time of 40 seconds until STARTUP following the first refueling outage.

\*\*\* insert (A)

## ELECTRICAL POWER SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

- d. At least once per 18 months during shutdown by:
1. Subjecting the diesel to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service.
  2. Verifying the diesel generator capability to reject a load of greater than or equal to 1190 kw for diesel generator 0, greater than or equal to 638 kw for diesel generators 1A and 2A, and greater than or equal to 2381 kw for diesel generator 1B while maintaining engine speed less than or equal to 75% of the difference between nominal speed and the overspeed trip setpoint or 15% above nominal, whichever is less.
  3. Verifying the diesel generator capability to reject a load of 2600 kw without tripping. The generator voltage shall not exceed 5000 volts during and following the load rejection.
  4. Simulating a loss of offsite power by itself, and:
    - a) For Divisions 1 and 2 and for Unit 2 Division 2:
      - 1) Verifying de-energization of the emergency busses and load shedding from the emergency busses.
      - 2) Verifying the diesel generator starts on the auto-start signal, energizes the emergency busses with permanently connected loads within 13 seconds, energizes the auto-connected loads and operates for greater than or equal to 5 minutes while its generator is so loaded. After energization, the steady state voltage and frequency of the emergency busses shall be maintained at  $4160 \pm 150$  volts and  $60 \pm 1.2$  Hz during this test.
    - b) For Division 3:
      - 1) Verifying de-energization of the emergency bus.
      - 2) Verifying the diesel generator starts on the auto-start signal, energizes the emergency bus with its loads within 13 seconds and operates for greater than or equal to 5 minutes while its generator is so loaded. After energization, the steady state voltage and frequency of the emergency bus shall be maintained at  $4160 \pm 150$  volts and  $60 \pm 1.2$  Hz during this test.
  5. Verifying that on an ECCS actuation test signal, without loss of offsite power, diesel generators 0, 1A and 1B start on the auto-start signal and operate on standby for greater than or equal to 5 minutes. The generator voltage and frequency shall be  $4160 + 416, -150$  volts and  $60 + 3.0, -1.2$  Hz within 13 seconds after the auto-start signal; the steady state generator voltage and frequency shall be maintained within these limits during this test.

\* \* insert (A)

## ELECTRICAL POWER SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

- b) Division 2, greater than or equal to:
  - 1) 488.5 amperes for the first 60 seconds,
  - 2) 237.6 amperes for the next 14 minutes,
  - 3) 177.6 amperes for the next 15 minutes, and
  - 4) 141.6 amperes for the next 30 minutes, and
  - 5) 54.4 amperes for the last 180 minutes.
- c) Division 3, greater than or equal to:
  - 1) 58.4 amperes for the first 60 seconds,
  - 2) 11.1 amperes for the next 239 minutes.
- d) Unit 2 Division 2, greater than or equal to:
  - 1) 488.5 amperes for the first 60 seconds,
  - 2) 237.6 amperes for the next 14 minutes,
  - 3) 177.6 amperes for the next 15 minutes,
  - 4) 141.6 amperes for the next 30 minutes, and
  - 5) 54.4 amperes for the last 180 minutes.
- e. At least once per 60 months, during shutdown, by verifying that the battery capacity is at least 80% of the manufacturers rating when subjected to a performance discharge test. Once per 60 month interval, this performance discharge test may be performed in lieu of the battery service test.
- f. Annual performance discharge tests of battery capacity shall be given to any battery that shows signs of degradation or has reached 85% of the service life expected for the application. Degradation is indicated when the battery capacity drops more than 10% of rated capacity from its average on previous performance tests, or is below 90% of the manufacturer's rating.

\* insert (A)

TABLE 3.8.3.2-1

PRIMARY CONTAINMENT PENETRATION CONDUCTOR  
OVERCURRENT PROTECTIVE DEVICES

<u>DEVICE NUMBER AND LOCATION</u>	<u>TRIP SETPOINT (Amperes)</u>	<u>RESPONSE TIME (Milliseconds/Cycles)</u> <sup>(a)</sup>	<u>SYSTEM/ COMPONENT POWERED</u>
<b>a. <u>6.9 KV Circuit Breakers</u></b>			
1. Swgr. 151 (Compt. 4)	840 <sup>(c)</sup>	83.3/5	RR Pump 1A
2. Swgr. 152 (Compt. 4)	840 <sup>(c)</sup>	83.3/5	RR Pump 1B
3. Swgr. 151-1 (Bkr. 2A)	720 <sup>(b)</sup>	83.3/5	RR Pump 1A, low speed
4. Swgr. 152-1 (Bkr. 2B)	720 <sup>(b)</sup>	83.3/5	RR Pump 1B, low speed
<b>b. <u>480 VAC Circuit Breakers</u> *</b>			
1. Swgr. 136Y (Compt. 403C)	160 <sup>(c)</sup>	50/3	VP/Pri. Cont. Vent Supply Fan 1B
2. Swgr. 135Y (Compt. 203A)	160 <sup>(c)</sup>	50/3	VP/Pri. Cont. Vent Supply Fan 1A
<b>c. <u>480 VAC (Molded Case) Circuit Breakers</u></b>			
1. Type K-M Cat # NZ MH-160/ZM6C			
a) MCC 136Y-2 (Compt. C4)	174	N.A.	RR/MOV 1B33-F067B
b) MCC 136Y-2 (Compt. A3)	72	N.A.	RR/MOV 1B33-F023B
c) MCC 134X-1 (Compt. B3)	10	N.A.	NB/MOV1 1B21-F001
d) MCC 134X-1 (Compt. B4)	10	N.A.	NB/MOV 1B21-F002

\* insert (A)



TABLE 3.8.3.3-1 (Continued)

MOTOR OPERATED VALVES THERMAL OVERLOAD  
PROTECTION

	<u>VALVE NUMBER</u>	<u>BYPASS DEVICE (Continuous)(Accident Conditions)</u>	<u>SYSTEM(S) AFFECTED</u>
e.	1B21 - F020	Continuous	Main steam system
	1B21 - F068	Continuous	
	1B21 - F070	Continuous	
	1B21 - F069	Continuous	
	1B21 - F071	Continuous	
	1B21 - F072	Continuous	
	1B21 - F073	Continuous	
f.	1B21 - F065A	Continuous	Main feedwater system
	1B21 - F065B	Continuous	
g.	1E21 - F001	Continuous	LPCS system
	1E21 - F005	Accident Conditions	
	1E21 - F011	Accident Conditions	
	1E21 - F012	Accident Conditions	
h.	1C41 - F001A	Accident Conditions	SBLCS
	1C41 - F001B	Accident Conditions	
i.	1G33 - F001	Accident Conditions	RWCU
	1G33 - F004	Accident Conditions	
j.	1E12 - F052A *	Accident Conditions	RHR system
	1E12 - F064A *	Accident Conditions	
	1E12 - F087A *	Accident Conditions	
	1E12 - F004A	Continuous	
	1E12 - F047A	Continuous	
	1E12 - F048A *	Accident Conditions	
	1E12 - F003A	Continuous	
	1E12 - F026A *	Accident Conditions	
	1E12 - F068A	Continuous	
	1E12 - F073A	Continuous	
	1E12 - F074A	Continuous	
	1E12 - F011A *	Accident Conditions	
	1E12 - F024A *	Accident Conditions	
	1E12 - F016A *	Accident Conditions	
	1E12 - F017A *	Accident Conditions	
	1E12 - F027A *	Accident Conditions	
	1E12 - F004B	Continuous	
	1E12 - F047B	Continuous	
	1E12 - F048B *	Accident Conditions	
	1E12 - F003B	Continuous	
	1E12 - F068B	Continuous	
	1E12 - F070B	Continuous	
	1E12 - F074B	Continuous	
	1E12 - F026B *	Accident Conditions	
	1E12 - F011B *	Accident Conditions	

\* insert (A)



TABLE 3.8.3.3-1 (Continued)

MOTOR OPERATED VALVES THERMAL OVERLOAD  
PROTECTION

	VALVE NUMBER	BYPASS DEVICE		SYSTEM(S) AFFECTED
		(Continuous)	(Accident Conditions)	
j.	1E12 - F024B *		Accident Conditions	RHR system
	1E12 - F006B		Continuous	
	1E12 - F016B *		Accident Conditions	
	1E12 - F017B *		Accident Conditions	
	1E12 - F042B *		Accident Conditions	
	1E12 - F064B *		Accident Conditions	
	1E12 - F093		Continuous	
	1E12 - F021 *		Accident Conditions	
	1E12 - F004C		Continuous	
	1E12 - F052B *		Accident Conditions	
	1E12 - F087B *		Accident Conditions	
	1E12 - F099B *		Accident Conditions	
	1E12 - F099A *		Accident Conditions	
	1E12 - F008		Accident Conditions	
	1E12 - F009		Accident Conditions	
	1E12 - F040A *		Accident Conditions	
	1E12 - F040B *		Accident Conditions	
	1E12 - F049A *		Accident Conditions	
	1E12 - F049B *		Accident Conditions	
	1E12 - F053A		Accident Conditions	
	1E12 - F053B		Accident Conditions	
	1E12 - F006A		Continuous	
	1E12 - F023		Accident Conditions	
	1E12 - F027B *		Accident Conditions	
	1E12 - F042A *		Accident Conditions	
	1E12 - F042C *		Accident Conditions	
	1E12 - F064C *		Accident Conditions	
	1E12 - F094		Continuous	
k.	1E51 - F086		Accident Conditions	RCIC system
	1E51 - F022		Accident Conditions	
	1E51 - F068		Continuous	
	1E51 - F069		Continuous	
	1E51 - F080		Accident Conditions	
	1E51 - F046		Accident Conditions	
	1E51 - F059		Accident Conditions	
	1E51 - F063		Accident Conditions	
	1E51 - F019		Accident Conditions	
	1E51 - F031		Continuous	
	1E51 - F045		Accident Conditions	
	1E51 - F008		Accident Conditions	
	1E51 - F010		Accident Conditions	
	1E51 - F013		Accident Conditions	
	1E51 - F064		Accident Conditions	
	1E51 - F076		Accident Conditions	

\* insert (A)

## ATTACHMENT C

### Significant Hazards Consideration

Commonwealth Edison has evaluated the proposed Technical Specification Amendment and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10 CFR 50.92, operation of LaSalle County Station Unit 1 in accordance with the proposed amendment will not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because the operability of the equipment is still maintained and based on the type of surveillances extended, no significant increase in the probability of equipment failure is postulated.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because this amendment does not remove or add any equipment.
- 3) Involve a significant reduction in the margin of safety because the increased surveillance interval does not significantly increase in any possibility that an undetected failure will occur in any of the related equipment covered by these Technical Specifications.

Based on the preceding discussion, it is concluded that the proposed system change clearly falls within all acceptable criteria with respect to the system or component, the consequences of previously evaluated accidents will not be increased and the margin of safety will not be decreased. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10 CFR 50.92(e), the proposed change does not constitute a significant hazards consideration.