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3.3.3.2 (THIS SPECIFICATION NUMBER IS NOT USED)

INSTRUMENTATION

MONITORING INSTRUMENTATION

INCORE DETECTOR SYSTEM

LIMITING CONDITION FOR OPERATION

3.3.3.2 The Incore Detector System shall be OPERABLE with:

- a. At least 75% of the detector locations and,
- b. A minimum of two detector locations per core quadrant,
- c. An OPERABLE incore detector location consist of a fuel assembly containing a fixed detector string with a minimum of three OPERABLE detectors or an OPERABLE movable incore detector capable of mapping the location.

APPLICABILITY: When the Incore Detector System is used for:

- a. Recalibration of the Excore Neutron Flux Detection System, or
- b. Monitoring the QUADRANT POWER TILT RATIO, or
- c. Measurement of F_{AH}^M and $F_Q(Z)$, or
- d. Input into the FIDS Alarm

ACTION:

With the Incore Detector System inoperable, do not use the system for the above applicable monitoring or calibration functions. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

(Plant procedures are used to determine that the Incore Detector System is OPERABLE.)

DELETE

INJECT

3.3.3.3 (THIS SPECIFICATION NUMBER IS NOT USED)

INSTRUMENTATION

MONITORING INSTRUMENTATION

SEISMIC INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.3 The seismic monitoring instrumentation shown in Table 3.3-7 shall be OPERABLE.

APPLICABILITY: At all times.

ACTION:

- a. With one or more of the above required seismic monitoring instruments inoperable for more than 30 days, prepare and submit a Special Report to the Commission pursuant to Specification 6.8.2 within the next 10 days outlining the cause of the malfunction and the plans for restoring the instrument(s) to OPERABLE status.
- b. The provisions of Specification 3.0.3 are not applicable.

DELETE

SURVEILLANCE REQUIREMENTS

4.3.3.3.1 Each of the above required seismic monitoring instruments shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION, and ANALOG CHANNEL OPERATIONAL TEST at the frequencies shown in Table 4.3-4.

4.3.3.3.2 Each of the above required seismic monitoring instruments actuated during a seismic event greater than or equal to 0.01 g shall be restored to OPERABLE status within 24 hours and a CHANNEL CALIBRATION performed within 30 days following the seismic event. Data shall be retrieved from actuated instruments and analyzed to determine the magnitude of the vibratory ground motion. A Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.8.2 within 14 days describing the magnitude, frequency spectrum, and resultant effect upon facility features important to safety.

603

91

133

INSERT

(THIS TABLE NUMBER IS NOT USED)

TABLE 3.3-7

SEISMIC MONITORING INSTRUMENTATION

INSTRUMENTS AND SENSOR LOCATIONS

MEASUREMENT
RANGE

MINIMUM
INSTRUMENTS
OPERABLE

1. Triaxial Time-History Accelerographs*		
a. 1-SM-XT-6700 Free Field Control Room East Air Intake, elevation 11' 6"	$\pm 1g$	1**
b. 1-SM-XT-6701 Containment Foundation, elevation -26' 0"	$\pm 1g$	1**
c. 1-SM-XT-6710 Containment Operating Floor, elevation 25' 0"	$\pm 1g$	1**
2. Triaxial Peak Accelerographs		
a. 1-SM-XR-6702 Accumulator Tank SI-TK-9C, elevation -6' 0"	0-20 Hz	1
b. 1-SM-XR-6703 Safety Injection Piping, elevation -24' 0"	0-20 Hz	1
c. 1-SM-XR-6704 PCCW Piping, Primary Auxiliary Building, elevation 47' 0"	0-20 Hz	1
3. Triaxial Seismic Switch#		
1-SM-XS-6709 Containment Foundation, elevation -26' 0"	0.025g to 0.25g	1**
4. Triaxial Response-Spectrum Recorders		
a. 1-SM-XR-6705 Containment Foundation, elevation -26' 0"	1-30 Hz	1**
b. 1-SM-XR-6706 Containment Foundation next to SI-TK-9C, elevation -26' 0"	1-30 Hz	1
c. 1-SM-XR-6707 Primary Auxiliary Building, elevation 25' 0"	1-30 Hz	1
d. 1-SM-XR-6708 Service Water Pump House, elevation 22'-0"	1-30 Hz	1

*Trigger mechanism in accelerograph unit activates recorders in control room when it senses a ground motion of 0.01g.

**With reactor control room indication

#Switch setpoint is 0.13g for horizontal and vertical axis.

INSERT

(THIS TABLE NUMBER IS NOT USED)

TABLE 4.3-4

SEISMIC MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INSTRUMENTS AND SENSOR LOCATIONS

CHANNEL
CHECK

CHANNEL
CALIBRATION

ANALOG
CHANNEL
OPERATIONAL
TEST

1. Triaxial Time-History Accelerographs*

a. 1-SM-XT-6700 Free Field Control
Room East Air Intake,**
elevation 11' 6"

M

R

SA

b. 1-SM-XT-6701 Containment Foundation,**
elevation -26' 0"

M

R

N.A.

c. 1-SM-XT-6710 Containment Operating
Floor,** elevation 25' 0"

M

R

N.A.

2. Triaxial Peak Accelerographs

a. 1-SM-XR-6702 Accumulator Tank
SI-TK-9C, elevation -6' 0"

N.A.

R

N.A.

b. 1-SM-XR-6703 Safety Injection
Piping, elevation -24' 0"

N.A.

R

N.A.

c. 1-SM-XR-6704 PCCW Piping, Primary
Auxiliary Building, elevation 47' 0"

N.A.

R

N.A.

3. Triaxial Seismic Switch

1-SM-XS-6709 Containment Foundation,**
elevation -26' 0"

M

R

N.A.

4. Triaxial Response Spectrum Recorders

a. 1-SM-XR-6705 Containment Foundation,**
elevation -26' 0"

M#

R

N.A.

b. 1-SM-XR-6706 Containment Foundation
next to SI-TK-9C, elevation -26' 0"

N.A.

R

N.A.

c. 1-SM-XR-6707 Primary Auxiliary
Building, elevation 25' 0"

N.A.

R

N.A.

d. 1-SM-XR-6708 Service Water Pump
House, elevation 22'-0"

N.A.

R

N.A.

*Each accelerograph has a triaxial trigger to activate the recorder.

**With reactor control room indications.

#CHANNEL CHECK to consist of turning the test/reset switch and verify all
lamps illuminate on 1-SM-XR-6705.

3.3.3.4 (THIS SPECIFICATION NUMBER IS NOT USED)

INSTRUMENTATION

MONITORING INSTRUMENTATION

METEOROLOGICAL INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.4 The meteorological monitoring instrumentation channels shown in Table 3.3-8 shall be OPERABLE.

APPLICABILITY: At all times.

DELETE

ACTION:

- a. With one or more required meteorological monitoring channels inoperable for more than 7 days, prepare and submit a Special Report to the Commission pursuant to Specification 6.8.2 within the next 10 days outlining the cause of the malfunction and the plans for restoring the channel(s) to OPERABLE status.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.4 Each of the meteorological monitoring instrumentation channels shown in Table 3.3-8 shall be demonstrated OPERABLE by the performance of:

- a. A Daily CHANNEL CHECK, and
- b. A Semiannual CHANNEL CALIBRATION

(THIS TABLE NUMBER IS NOT USED)

INSERT

TABLE 3.3-8

METEOROLOGICAL MONITORING INSTRUMENTATION

INSTRUMENT

LOCATION

MINIMUM
OPERABLE

1. Wind Speed

a. Lower Level

Nominal Elev. 43 ft

1

b. Upper Level

Nominal Elev. 209 ft

1

2. Wind Direction

a. Lower Level

Nominal Elev. 43 ft

1

b. Upper Level

Nominal Elev. 209 ft

1

3. Air Temperature - ΔT

a. Lower Level

Between Elev. 43 ft and 150 ft

1

b. Upper Level

Between Elev. 43 ft and 209 ft

1

DELETE

INSERT

3/4.3.4 (THIS SPECIFICATION NUMBER IS NOT USED)

INSTRUMENTATION

3/4.3.4 TURBINE OVERSPEED PROTECTION

LIMITING CONDITION FOR OPERATION

3.3.4 At least one Turbine Overspeed Protection System shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

- a. With one stop valve or one control valve per high pressure turbine steam line inoperable and/or with one intermediate stop valve or one intercept valve per low pressure turbine steam line inoperable, restore the inoperable valve(s) to OPERABLE status within 72 hours, or close at least one valve in the affected steam line(s) or isolate the turbine from the steam supply within the next 6 hours.
- b. With the above required Turbine Overspeed Protection System otherwise inoperable, within 6 hours isolate the turbine from the steam supply.

SURVEILLANCE REQUIREMENTS

4.3.4.1 The provisions of Specification 4.0.4 are not applicable.

4.3.4.2 The above required Turbine Overspeed Protection System shall be demonstrated OPERABLE:

- a. At least once per 7 days by cycling each of the following valves through at least one complete cycle from the running position:
 - 1) Four high pressure turbine stop valves, and
 - 2) Six low pressure combined intermediate valves.
- b. At least once per 31 days by direct observation of the movement of each of the above valves and the four high pressure turbine control valves through one complete cycle from the running position,
- c. At least once per 18 months by performance of a CHANNEL CALIBRATION on the Turbine Overspeed Protection Systems, and
- d. At least once per 40 months by disassembling at least one of each of the above valves and performing a visual and surface inspection of valve seats, disks, and stems and verifying no unacceptable flaws or excessive corrosion. If unacceptable flaws or excessive corrosion are found, all other valves of that type shall be inspected.

DELETE

INSTRUMENTATION

BASES

MONITORING INSTRUMENTATION

3/4.3.3.1 RADIATION MONITORING FOR PLANT OPERATIONS (Continued)

and abnormal conditions. Once the required logic combination is completed, the system sends actuation signals to initiate alarms or automatic isolation action and actuation of Emergency Exhaust or Ventilation Systems.

3/4.3.3.2 INCORE DETECTOR SYSTEM (THIS SPECIFICATION NUMBER IS NOT USED) ^{DELETE} ^{INSERT}

The Incore Detector System consists of either a) fixed detector strings and their associated signal processing, or b) movable incore detectors and their associated signal processing. OPERABILITY may be met by either fixed detectors or movable detectors but not by a combination of both.

The OPERABILITY of the Incore Detector System ensures that the measurements obtained from use of this system accurately represent the spatial neutron flux distribution of the core. ^{DELETE}

For the purpose of measuring $F_0(Z)$ or F_{0M} , a full incore flux map is used. Quarter-core flux maps, as defined in WCAP-8648, June 1976, may be used in recalibration of the Excore Neutron Flux Detection System, and full incore flux maps or symmetric incore detectors may be used for monitoring the QUADRANT POWER TILT RATIO when one Power Range channel is inoperable.

3/4.3.3.3 SEISMIC INSTRUMENTATION (THIS SPECIFICATION NUMBER IS NOT USED) ^{DELETE} ^{INSERT}

The OPERABILITY of the seismic instrumentation ensures that sufficient capability is available to promptly determine the magnitude of a seismic event and evaluate the response of those features important to safety. This capability is required to permit comparison of the measured response to that used in the design basis for the facility to determine if plant shutdown is required pursuant to Appendix A of 10 CFR Part 100. The instrumentation is consistent with the recommendations of Regulatory Guide 1.12, "Instrumentation for Earthquakes," April 1974. ^{DELETE}

3/4.3.3.4 METEOROLOGICAL INSTRUMENTATION (THIS SPECIFICATION NUMBER IS NOT USED) ^{DELETE} ^{INSERT}

The OPERABILITY of the meteorological instrumentation ensures that sufficient meteorological data are available for estimating potential radiation doses to the public as a result of routine or accidental release of radioactive materials to the atmosphere. This capability is required to evaluate the need for initiating protective measures to protect the health and safety of the public and is consistent with the recommendations of Regulatory Guide 1.23, "Onsite Meteorological Programs," February 1972. ^{DELETE}

3/4.3.3.5 REMOTE SHUTDOWN SYSTEM

The OPERABILITY of the Remote Shutdown System ensures that sufficient capability is available to permit safe shutdown of the facility from locations outside of the control room. This capability is required in the event control room habitability is lost and is consistent with General Design Criterion 19 of Appendix A to 10 CFR Part 50.

INSTRUMENTATION

BASES

MONITORING INSTRUMENTATION

3/4.3.3.10 RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION (Continued)

of General Design Criteria 60, 63, and 64 of Appendix A to 10 CFR Part 50. The sensitivity of any noble gas activity monitors used to show compliance with the gaseous effluent release requirements of Specification 3.11.2.2 shall be such that concentrations as low as 1×10^{-6} $\mu\text{Ci/cc}$ are measurable.

3/4.3.4 ^{DELETE} TURBINE OVERSPEED PROTECTION ^{INSERT} (THIS SPECIFICATION NUMBER IS NOT USED)

~~This specification is provided to ensure that the turbine overspeed protection instrumentation and the turbine speed control valves are OPERABLE and will protect the turbine from excessive overspeed. Protection from turbine excessive overspeed is required since excessive overspeed of the turbine could generate potentially damaging missiles which could impact and damage safety-related components, equipment, or structures.~~

DESIGN FEATURES

DESIGN PRESSURE AND TEMPERATURE

5.2.2 The containment building is designed and shall be maintained for a maximum internal pressure of 52.0 psig and a temperature of 296°F.

5.3 REACTOR CORE

FUEL ASSEMBLIES

5.3.1 The core shall contain 193 fuel assemblies with each fuel assembly containing 264 fuel rods clad with a zirconium alloy. Each fuel rod shall have a nominal active fuel length of 144 inches. The initial core loading shall have a maximum enrichment of 3.15 weight percent U-235. Reload fuel shall be similar in physical design to the initial core loading and shall have a maximum enrichment of 5.0 weight percent U-235.

CONTROL ROD ASSEMBLIES

5.3.2 The core shall contain 57 full-length control rod assemblies. The full-length control rod assemblies shall contain a nominal 142 inches of absorber material. The nominal values of absorber material shall be 80% silver, 15% indium, and 5% cadmium. All control rods shall be clad with stainless steel tubing.

5.4 REACTOR COOLANT SYSTEM

DESIGN PRESSURE AND TEMPERATURE

5.4.1 The Reactor Coolant System is designed and shall be maintained:

- a. In accordance with the Code requirements specified in Section 5.2 of the FSAR, with allowance for normal degradation pursuant to the applicable Surveillance Requirements,
- b. For a pressure of 2485 psig, and
- c. For a temperature of 650°F, except for the pressurizer which is 680°F.

VOLUME

5.4.2 The total water and steam volume of the Reactor Coolant System is 12,255 cubic feet at a nominal T_{avg} of 588.5°F.

5.5 METEOROLOGICAL TOWER LOCATION

5.5.1 The meteorological tower shall be located as shown on Figure 5.1-1.

INSERT → 5.5 (THIS SPECIFICATION NUMBER IS NOT USED)

SECTION III

Retype of Proposed Changes

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INSTRUMENTATION

BASES

MONITORING INSTRUMENTATION

3/4.3.3.1 RADIATION MONITORING FOR PLANT OPERATIONS (Continued)

and abnormal conditions. Once the required logic combination is completed, the system sends actuation signals to initiate alarms or automatic isolation action and actuation of Emergency Exhaust or Ventilation Systems.

3/4.3.3.2 (THIS SPECIFICATION NUMBER IS NOT USED)

3/4.3.3.3 (THIS SPECIFICATION NUMBER IS NOT USED)

3/4.3.3.4 (THIS SPECIFICATION NUMBER IS NOT USED)

3/4.3.3.5 REMOTE SHUTDOWN SYSTEM

The OPERABILITY of the Remote Shutdown System ensures that sufficient capability is available to permit safe shutdown of the facility from locations outside of the control room. This capability is required in the event control room habitability is lost and is consistent with General Design Criterion 19 of Appendix A to 10 CFR Part 50.

INSTRUMENTATION

BASES

MONITORING INSTRUMENTATION

3/4.3.3.10 RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION (Continued)

of General Design Criteria 60, 63, and 64 of Appendix A to 10 CFR Part 50. The sensitivity of any noble gas activity monitors used to show compliance with the gaseous effluent release requirements of Specification 3.11.2.2 shall be such that concentrations as low as $1 \times 10^{-6} \mu\text{Ci/cc}$ are measurable.

3/4.3.4 (THIS SPECIFICATION NUMBER IS NOT USED)

DESIGN FEATURES

DESIGN PRESSURE AND TEMPERATURE

5.2.2 The containment building is designed and shall be maintained for a maximum internal pressure of 52.0 psig and a temperature of 296°F.

5.3 REACTOR CORE

FUEL ASSEMBLIES

5.3.1 The core shall contain 193 fuel assemblies with each fuel assembly containing 264 fuel rods clad with Zircaloy-4. Each fuel rod shall have a nominal active fuel length of 144 inches. The initial core loading shall have a maximum enrichment of 3.15 weight percent U-235. Reload fuel shall be similar in physical design to the initial core loading and shall have a maximum enrichment of 5.0 weight percent U-235.

CONTROL ROD ASSEMBLIES

5.3.2 The core shall contain 57 full-length control rod assemblies. The full-length control rod assemblies shall contain a nominal 142 inches of absorber material. The nominal values of absorber material shall be 80% silver, 15% indium, and 5% cadmium. All control rods shall be clad with stainless steel tubing.

5.4 REACTOR COOLANT SYSTEM

DESIGN PRESSURE AND TEMPERATURE

5.4.1 The Reactor Coolant System is designed and shall be maintained:

- a. In accordance with the Code requirements specified in Section 5.2 of the FSAR, with allowance for normal degradation pursuant to the applicable Surveillance Requirements.
- b. For a pressure of 2485 psig, and
- c. For a temperature of 650°F, except for the pressurizer which is 680°F.

VOLUME

5.4.2 The total water and steam volume of the Reactor Coolant System is 12,255 cubic feet at a nominal T_{avg} of 588.5°F.

5.5 (THIS SPECIFICATION NUMBER IS NOT USED)

Section IV

Determination of Significant Hazards for Proposed Changes

IV. DETERMINATION OF SIGNIFICANT HAZARDS FOR PROPOSED CHANGES

License Amendment Request (LAR) 96-02 proposes changes to the Seabrook Station Technical Specifications to relocate four instrumentation-related Limiting Conditions for Operation (LCOs) contained in Technical Specification (TS) Section 3/4.3, "Instrumentation", to the Seabrook Station Technical Requirements Manual (SSTR). They are:

- LCO 3.3.3.2 - Incore Detector System
- LCO 3.3.3.3 - Seismic Instrumentation
- LCO 3.3.3.4 - Meteorological Instrumentation
- LCO 3.3.4 - Turbine Overspeed Protection

In accordance with 10CFR50.92, North Atlantic has concluded that the proposed changes do not involve a significant hazards consideration (SHC). The basis for the conclusion that the proposed changes do not involve a SHC is as follows:

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

The incore detector system, seismic monitoring instrumentation, meteorological monitoring instrumentation and turbine overspeed protection system are neither part of an initial condition of a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier, nor are they relied upon as a primary success path to mitigate such events. None of these instrumentation-related systems are related to events that are considered frequent or dominant contributors to plant risk. These instrumentation-related systems are not considered a design feature or an operating restriction that is an initial condition of a design basis accident or transient analysis, nor do they provide a function or actuate any accident mitigation feature in order to mitigate the consequences of a design basis accident or transient. Therefore, malfunction of anyone of these systems will not result in an increase in the probability or consequences of an accident previously evaluated.

The proposed changes do not involve any physical changes to the plant, do not alter the way any structure, system or component functions, do not modify the manner in which the plant is operated, and do not impact the physical protective boundaries of the plant. The proposed changes do not decrease the effectiveness of administrative controls of assuring operation of the facility in a safe manner.

Relocation of the aforementioned instrumentation-related LCOs and associated SRs to the Technical Requirements Manual will continue to be administratively controlled in accordance with TS Section 6.0, "Administrative Controls". The Seabrook Station Technical Requirements Manual is a licensee-controlled document which contain certain technical requirements and is the implementing manual for the Technical Specification Improvement Program. Changes to these requirements are reviewed and approved in accordance with Seabrook Station Technical Specifications, Section 6.7, and as outlined in the Technical Requirements Manual. Specifically, all changes to the Technical Requirements Manual require a 10 CFR 50.59 safety evaluation and be reviewed and approved by the Station Operations Review Committee (SORC) and the Nuclear Safety Audit Review Committee (NSARC) prior to implementation.

The proposed changes will not degrade the ability of systems, structures and components important to safety to perform their safety function. The proposed changes will not change the response of any system, structure or component important to safety as described in the Seabrook Station Updated Final Safety Analysis Report (UFSAR). Since the plant response to an accident will not change, there is no change in the potential for an increase in the consequences of an accident previously analyzed. As such, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed changes do not involve any physical changes to the plant, do not alter the way any structure, system or component functions, do not modify the manner in which the plant is operated, and do not impact the physical protective boundaries of the plant. The proposed changes do not decrease the effectiveness of administrative controls of assuring operation of the facility in a safe manner.

Future changes to these instrumentation-related requirements will be reviewed and approved in accordance with Seabrook Station Technical Specifications, Section 6.7, and as outlined in the Technical Requirements Manual. Specifically, all changes to the Technical Requirements Manual require a 10 CFR 50.59 safety evaluation and be reviewed and approved by the Station Operations Review Committee (SORC) and the Nuclear Safety Audit Review Committee (NSARC) prior to implementation.

Furthermore, the proposed changes will not degrade the ability of systems, structures and components important to safety to perform their safety function. The proposed changes will not change the response of any system, structure or component important to safety as described in the Seabrook Station Updated Final Safety Analysis Report (UFSAR). Since the plant response to an accident will not change, there is no change in the potential for an increase in the consequences of an accident previously analyzed, nor can it create the possibility of a new or different kind of accident from any previously evaluated.

Relocation of the aforementioned instrumentation-related LCOs and associated SRs to the Technical Requirements Manual will not create the possibility of a new or different kind of accident from any previously analyzed.

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

There are no changes being made to any safety limits or safety system settings that would adversely impact plant safety. The proposed changes do not affect the ability of systems, structures or components important to safety to ensure: 1) the safe shutdown of the facility, and 2) the mitigation and control of accident conditions within the facility. In addition, the proposed changes do not affect the ability of safety systems to ensure that: 1) the facility can be maintained in a shutdown or refueling condition for extended periods of time, and 2) sufficient instrumentation and control capability is available for monitoring and maintaining the unit status.

The Technical Specifications recognize that the inoperability of the incore detection, seismic monitoring and meteorological monitoring systems do not require a change to the plant operating conditions, thus, the provisions of TS 3.0.3 are stated as not being applicable. As such, the proposed changes do not involve a significant reduction in the margin of safety.

The measurements from the incore detectors are used in a confirmatory manner. Core power distribution limits are addressed, and will continue to be addressed, in TS Section 3/4.2, "Power Distribution Limits". The present TS 3.3.3.2 ACTION for Incore Detector System inoperability is not to use the system for monitoring or calibration functions. This will continue to be the case when TS 3.3.3.2 is relocated to the Technical Requirements Manual. Where operation is dependent on the FIDS Alarm being OPERABLE and should FIDS Alarm inoperability occur, again other TS 3/4.2 Section LCOs and corresponding ACTIONS provide instruction for FIDS Alarm inoperability. As such, the proposed change does not involve a significant reduction in the margin of safety.

Turbine overspeed protection is neither part of an initial condition of a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier, nor is it relied upon as a primary success path to mitigate such events. In view of the orientation of the main turbine relative to plant structures and equipment, the low probability of unacceptable missile damage to structures and equipment important to safety, the on-going and augmented surveillance and maintenance programs, and industry operating experience of low failure rates of main turbines due to overspeed events; the consequences of a turbine overspeed event which generates missiles that directly leads to failure of plant structures and equipment important to safety is very low. There is low likelihood of significant risk to public health and safety because of turbine overspeed events. Failure of plant structures and equipment due to missiles strikes are much more likely to be caused by events other than turbine failures. As such, the proposed change does not involve a significant reduction in the margin of safety.

Future changes to these instrumentation-related requirements will be reviewed and approved in accordance with Seabrook Station Technical Specifications, Section 6.7, and as outlined in the Technical Requirements Manual. Specifically, all changes to the Technical Requirements Manual require a 10 CFR 50.59 safety evaluation and be reviewed and approved by the Station Operations Review Committee (SORC) and the Nuclear Safety Audit Review Committee (NSARC) prior to implementation.

Relocation of the aforementioned instrumentation-related LCOs and associated SRs to the Technical Requirements Manual does not involve a significant reduction in the margin of safety.

Based on the above evaluation, North Atlantic concludes that the proposed changes do not constitute a significant hazard.