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June 30, 1997

SOUTHERN COMPANY
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Docket Numbers: 50-348
50-364

10 CFR 50.90

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Joseph M. Farley Nuclear Plant
Request For Technical Specification Changes
Control Room, Penetration Room, and Containment Purge
Filtration Systems and Radiation Monitoring Instrumentation

Ladies and Gentlemen:

In accordance with the provisions of 10 CFR 50.90, Southern Nuclear Operating Company (SNC) proposes to amend the Farley Nuclear Plant (FNP) Unit 1 and Unit 2 Technical Specifications (TS), Appendix A to Operating Licenses NPF-2 and NPF-8. This TS amendment request revises and clarifies requirements for the Control Room Emergency Filtration System (CREFS), the Penetration Room Filtration System (PRFS) and related Storage Pool Ventilation System; revises the required number of Radiation Monitoring Instrumentation channels; and deletes the Containment Purge Exhaust Filter (CPEF) specification.

On June 22, 1984, the NRC approved TS Amendment Numbers 46 and 37 for FNP Units 1 and 2 respectively. These amendments, among other changes, clarified the testing requirements for the CREFS, the PRFS, and the CPEF by updating the references from ANSI N510-1975 to ANSI N510-1980 and by adding specific ANSI N510-1980 section numbers to certain surveillance requirements (SRs). On May 1, 1997, the NRC approved TS Amendment Numbers 127 and 121 for FNP Units 1 and 2 respectively. These amendments updated references to ANSI N510 sections 5, 8, and 14 to a later version, which is ASME N510-1989, "Testing of Nuclear Air Treatment Systems," with errata dated January 1991, and added a footnote that references the FNP Final Safety Analysis Report (FSAR) for relevant testing details. By SNC letter dated June 13, 1997, a Technical Specifications amendment was requested to TS 3.9.13 for Units 1 and 2. The appropriate pages from that amendment request have been included in this package.

This proposed amendment further clarifies the SRs by updating references to ANSI N510 sections 10, 12, and 13 to ASME N510-1989, "Testing of Nuclear Air Treatment Systems," with errata dated January 1991 and by adding a footnote which references the FNP Final Safety Analysis Report (FSAR) for relevant testing details. The FNP FSAR is being revised to include a detailed discussion of the applicability of ASME N510-1989 sections 10, 11, and 15. Differences between ANSI N510-1980 and ASME N510-1989 have been reviewed by SNC, and conversion to ASME N510-1989 for sections 10, 11, and 15 is considered to be an enhancement. In addition, ASME N510-1989 has been approved and endorsed by the NRC in NUREG 1431.

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Additional related changes are proposed to reflect the latest safety analyses for a fuel handling accident (FHA) in the spent fuel pool (SFP) area or inside containment, and for post-LOCA Emergency Core Cooling System (ECCS) recirculation loop leakage outside containment. The PRFS and CREFS are being revised to provide "dirty filter" pressure and flow requirements and to revise charcoal adsorber laboratory testing efficiency criteria. Storage Pool Ventilation SRs are being revised to be consistent with the changes to the PRFS.

The CPEF specification is being deleted to reflect reliance upon rapid isolation of the containment by the purge exhaust radiation monitors. The Radiation Monitoring Instrumentation Table 3.3-6 is being enhanced to require two channels of radiation monitors for the containment purge, spent fuel pool area normal exhaust, and control room normal intake flow paths.

This amendment is required because of SNC's commitment relative to recent NRC inspections related to the design bases of the PRF system. Historically, FNP has interpreted that only applicable portions of sections of ANSI N510-1980 referenced in the TS were required to be performed. Based on discussions with the NRC, SNC understands that the current NRC interpretation is that unless allowed by the TS, the FNP ventilation filter test program for the CREFS, PRF, and CPEF must fully comply with every detail of ANSI N510-1980 Sections 10, 12, and 13. Although these systems have been deemed operable and able to perform their intended safety functions, a TS change is requested. The additional changes described above reflect enhancements to the ESF filtration systems which allow more effective use of FNP resources.

Enclosure 1 provides a safety assessment for the proposed changes. Enclosure 2 provides the basis for a determination that the proposed changes do not involve a significant hazards consideration pursuant to 10 CFR 50.92. Enclosure 3 provides the proposed changes to the Unit 1 Technical Specifications. Enclosure 4 provides the proposed changes to the Unit 2 Technical Specifications. Enclosure 5 provides the Units 1 and 2 marked-up Technical Specification pages.

As denoted in 10 CFR 50.92(c), SNC has determined the proposed changes to the FNP Technical Specifications do not involve a significant hazards consideration. The basis for this evaluation is provided in Enclosure 2. SNC has also determined that the proposed changes will not significantly affect the quality of the human environment. A copy of the proposed changes has been sent to Dr. D. E. Williams, the Alabama State Designee, in accordance with 10 CFR 50.91(b)(i).

SNC requests that the NRC review and approve the proposed TS changes by February 28, 1998. SNC plans to implement the proposed changes within 30 days of issuance by the NRC. In addition, SNC is continuing to review the current TS with regard to ventilation filter testing and will submit further changes separately or as part of its Improved Technical Specifications (ITS) submittal.

Mr. D. N. Morey states that he is a Vice President of Southern Nuclear Operating Company and is authorized to execute this oath on behalf of Southern Nuclear Operating Company and that, to the best of his knowledge and belief, the facts set forth in this letter and enclosures are true.

If you have any questions, please advise.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

DN Morey

Dave Morey

Sworn to and subscribed before me this 30th day of June 1997

Martha Gayle Dow

Notary Public

My Commission Expires: November 1, 1997

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Enclosures:

1. Safety Assessment
2. 10 CFR 50.92 Evaluation
3. Unit 1 Technical Specification Pages
4. Unit 2 Technical Specification Pages
5. Units 1 & 2 Marked-Up Technical Specification Pages

cc: Mr. L. A. Reyes, Region II Administrator
Mr. J. I. Zimmerman, NRR Project Manager
Mr. T. M. Ross, Plant Sr. Resident Inspector
Dr. D. E. Williamson, State Department of Public Health

Enclosure 1

Joseph M. Farley Nuclear Plant
Control Room, Penetration Room, and Containment Purge Filtration Systems
and Radiation Monitoring Instrumentation
Technical Specification Changes

Safety Assessment

Enclosure 1

Joseph M. Farley Nuclear Plant
Control Room, Penetration Room, and Containment Purge Filtration Systems
and Radiation Monitoring Instrumentation
Technical Specification Changes

Safety Assessment

The Farley Nuclear Plant (FNP) Technical Specifications (TSs) for TS 3/4.7.7 Control Room Emergency Filtration System (CREFS), TS 3/4.7.8 Penetration Room Filtration System (PRFS), TS 3/4.9.12 Storage Pool Ventilation (Fuel Storage), TS 3/4.9.13 Storage Pool Ventilation (Fuel Movement), and TS 3/4.3.3 Radiation Monitoring Instrumentation are proposed to be revised. Technical Specification 3/4.9.14, Containment Purge Exhaust Filter (CPEF), is proposed to be deleted.

FNP TS Surveillance Requirements (SRs) currently reference ANSI N510-1980 for performing in-place DOP testing (section 10), charcoal adsorber leak testing (section 12), and verifying laboratory testing efficiencies for FNP ventilation and filtration systems (section 13). Specific sections within ANSI N510-1980 do not clearly differentiate between testing required for initial acceptance testing and testing required for periodic surveillances. In addition, some characteristics of the FNP system designs do not allow for complete application of the 1980 standard without major modification or disassembly or significant breaching of pressure boundaries. Testing HEPA and charcoal adsorber combined pressure drop at design flow rate must be revised since the original system designs were not required to be in conformance with ANSI N509 as assumed by ANSI N510-1980. Adsorber efficiency laboratory testing in accordance with ASME N510-1989 recommended methods does not require a large safety factor, thus the acceptance criteria are being revised.

The safety analyses for post-LOCA ECCS recirculation loop leakage outside containment and fuel handling accident (FHA) in the spent fuel pool area have been revised to delete credit for humidity control for the PRF, thus the monthly operation requirement is being changed from 10 hours to dry the charcoal adsorber to 15 minutes to verify proper system function, and the fuel storage pool ventilation specifications are changed consistent with this. As an enhancement, a requirement to verify the capability of the PRF in the post-LOCA mode to maintain a negative pressure in the penetration room boundary is being added.

The revised safety analyses take credit for radiation monitoring instrumentation initiating protective actions in the event of a FHA. Two control room radiation monitoring channels will be required to provide redundant, single failure proof isolation of the normal HVAC system. For a FHA in containment, two channels of containment purge and exhaust isolation radiation monitors will be required to provide redundant, single failure proof isolation of the containment with no credit for filtration, and for a FHA in the fuel storage pool area, two channels of fuel storage pool area radiation monitors will be required to provide isolation of the normal HVAC system and initiation of the PRF. These requirements for two channels are in response to a FHA, thus they are applicable only when moving irradiated fuel or moving heavy loads over irradiated fuel.

Enclosure 1

The following is a summary of the proposed TS changes:

1. TS SRs that currently reference ANSI N510-1980 sections 10, 12, and 13 will be changed to make reference to ASME N510-1989. Wherever ASME N510-1989 is used in the TS SRs a footnote will be added that states:

   "The FNP Final Safety Analysis Report identifies the relevant surveillance testing requirements."

2. The pressure drop (measured in inches water gauge) across the combined HEPA and charcoal adsorber will be revised to a value consistent with the design of the system (2.3 inches for the CREFS Recirculation Unit, 2.9 inches for the CREFS Filtration Unit, 2.2 inches for the CREFS Pressurization Unit, and 2.6 inches for the PRF).

3. The adsorber laboratory testing criteria will be revised to be consistent with the testing methods recommended by ASME N510-1989, except that ASTM D3803-1989 will be used for laboratory testing of adsorber samples. The temperature for testing of the adsorber sample will be changed to 30 °C for all filters; the efficiencies for the CREFS filters will be changed to 97.5%, 97.5% and 99.5% for the recirculation, filtration and pressurization units respectively; and the efficiency and relative humidity will be changed to 90% and 95% respectively for the PRF due to the deletion of credit for the heaters in dose calculations (see also 4 below).

4. The PRF heater dissipation surveillance will be deleted and operation time for the PRF will be revised from 10 hours every 31 days on a staggered test basis to 15 minutes every 31 days on a staggered test basis.

5. As a clarification, the 10 hour run with the heater control circuit energized on the control room pressurization unit has been changed to the Improved Technical Specification wording.

6. As an enhancement, an additional surveillance to verify the integrity of the PRF boundary will be added. New surveillance requirement 4.7.8 e will demonstrate that one PRF system remains capable of maintaining the RHR heat exchanger room at a negative pressure ≤ -0.125 in. water gauge, and the remaining surveillances are renumbered appropriately.

7. Footnotes will be added to Table 3.3-6 noting that two channels of control room radiation monitors, containment purge and exhaust radiation monitors, and fuel storage pool area radiation monitors are required when moving irradiated fuel or heavy loads over irradiated fuel. Action 25 will be revised consistent with the flexibility provided by the existing PRF actuation signal design.

8. Action 27 of Table 3.3-6 will be clarified to require operation of the control room pressurization as well as the recirculation subsystems in the emergency recirculation mode.

9. The containment purge exhaust filter will be removed from the Technical Specifications.

10. The bases for affected Technical Specifications will be revised consistent with the above changes, and system names will be revised consistent with FNP nomenclature. There are also two editorial changes which remove footnotes that are no longer applicable.

It is the intent of the first proposed change (i.e., change 1 above) to clarify the requirements associated with FNP filtration system testing. Conversion of the ANSI N510-1980 to ASME N510-1989 for sections 10, 11, and 15 will bring FNP SRs closer to current industry standards. In addition, similar changes have been previously approved by the NRC for other nuclear plants. The relocation of specific testing requirements to the FSAR is consistent with guidance provided by NUREG 1431 Improved Standard Technical Specifications for Westinghouse Plants. FNP has committed to the NRC by a previous docketed letter to submit an ITS conversion package.

Differences between ANSI N510-1980 and ASME N510-1989 have been reviewed by SNC, and conversion to ASME N510-1989 for sections 10, 11, and 15 are considered to be an enhancement. In addition, ASME N510-1989 has been approved and endorsed by the NRC in NUREG 1431. Inclusion of the specific testing requirements in the FNP FSAR will ensure that any deviation to the testing requirements of ASME N510-1989 will receive appropriate review through the 10 CFR 50.59 process for this change and any changes made in the future.

Proposed change 2 is required because some characteristics of the FNP system designs do not allow for complete application of the 1980 standard without major modifications. Testing HEPA and charcoal adsorber combined pressure drop at design flow rate must be revised to adequately verify "dirty" filter pressure drop limitations since the original fan and system designs were required to be in conformance with Regulatory Guide 1.52 in lieu of ANSI N509 as assumed by ANSI N510-1980. The revised values reflect the as-installed dirty filter pressure drop limitations of the FNP equipment. Verification of these values at design flow will maintain the filter within design internal pressure loads.

Changing the filter test methodology to be consistent with ASME N510-1989 includes a reference to ASTM D3803-1989. This revision of the standard recommends a charcoal test temperature of 30 °C which is consistent with the FNP filter operating temperature and will be adopted. In support of proposed change 3, revised safety analyses have been prepared for the ECCS recirculation loop leakage outside containment contributions to offsite and control room LOCA doses and offsite doses for fuel handling accidents in the fuel storage pool area and in the containment. The ECCS leakage analyses and FHA in the fuel storage pool area were revised to delete credit for humidity control by electric heaters in the PRF system. This has the effect of reducing the filter efficiency due to the increase in relative humidity. The reduced efficiency is modeled in accordance with Regulatory Guide 1.52 for a 2 inch filter with relative humidity greater than 70% as 90% removal for elemental iodine and 30% removal for organic iodine.

Revising the PRF efficiency downward as shown in Table 1 increases the post-LOCA ECCS loop leakage contribution to Control Room, Site Boundary and LPZ thyroid doses by 5, 7, and 11 REM respectively. These small increases yield total doses (25.5, 192, 123 REM thyroid for the control room, site boundary and LPZ respectively) which continue to meet GDC 19 and 10 CFR 100 guidelines. Using the assumptions shown in Table 2, the resultant FHA doses are shown in Table 3. These results meet the Standard Review Plan (SRP) Section 15.7.4 criteria of maintaining offsite doses well within 10 CFR 100 guidelines. Therefore, it is acceptable to revise the PRF laboratory test efficiency criteria to 90% for methyl iodide consistent with Regulatory Guide 1.52.

Recent discussions with the NRC staff have indicated that the safety factors implied in Regulatory Guide 1.52 are overly conservative when applied to the conservative test methodology recommended by ASME N510-1989 (and by reference ASTM D3803-1989) and a safety factor of two would be acceptable. Hence the laboratory test acceptance criteria for CREFS efficiencies credited in the safety analyses (95% for the 2 inch deep recirculation and filtration units and 99% for the 6 inch deep pressurization unit) are revised to reflect a safety factor of two. This yields laboratory test acceptance criteria of 97.5% for the recirculation and filtration units and 99.5% for the pressurization unit. This safety factor and the conservative test methods and dose calculations ensure that control room operator doses will continue to meet General Design Criterion (GDC) 19 limits.

Since the revised safety analyses indicate that dose results meet acceptance criteria without credit for the PRF heater, change 4 proposes to delete heater dissipation surveillance, and delete the 10 hour heater run time and replace it with a verification that the system performance is stable for 15 minutes. This testing requirement is consistent with guidance provided by NUREG 1431, Improved Standard Technical Specifications for Westinghouse Plants for filter systems without heaters.

To clarify the wording on the 10 hour run for the control room pressurization unit, change 5 adds the wording from NUREG 1431 on the heater control circuit being energized during the run. This change will bring this surveillance into agreement with the Improved Technical Specifications.

As an enhancement of the testing program, and in response to concerns about verification of the condition of the penetration room pressure boundary integrity, change 6 will add a surveillance of the capability of each PRFS to maintain a negative pressure in the RHR heat exchanger room. This requirement will provide reasonable assurance that the penetration room pressure boundary has not suffered degradation, minimizing unfiltered release of ECCS recirculation loop leakage, and thereby provides additional confidence that offsite and control room doses will remain within 10 CFR 100 and GDC 19 guidelines.

Change 7 is proposed to conform the Technical Specifications with the revised accident analyses prepared to support changes 3 and 4 described above. The revised analyses take credit for operation of the affected radiation monitors; and in order to mitigate a single failure of one radiation monitor, a second radiation monitor must be available. Since the radiation monitors are modeled to mitigate the consequences of an FHA, two channels must be available when the possibility of an FHA exists; that is, when irradiated fuel is

being moved or when heavy loads are being moved over irradiated fuel. No change to safety analyses which credit a radiation monitor was made for any other conditions, so the requirement for two channels is limited to the conditions described here. As discussed in 3 and 4 above, the offsite dose results continue to be well within the 10 CFR 100 guidelines. Since either fuel storage pool area radiation monitor will provide isolation of the normal HVAC system and thereby generate both trains of low differential pressure signals on loss of the normal HVAC flow, both trains of PRF will receive start signals from proper functioning of either radiation monitor. This existing redundancy allows unlinking action 25 for the fuel storage pool area radiation monitor from the operability of the PRF filters; and actions similar to the fuel storage pool ventilation actions are added here to provide the same level of protection as the current Technical Specifications.

Action 27 to Table 3.3-6 is being revised per change 8 in order to clarify that protection of the control room requires that the recirculation, filtration and the pressurization filter units be placed in operation. This configuration, with all filters in one train operating is consistent with the flow paths, flow rates, and filter functions modeled in the safety analyses. This is an editorial change to conform the Technical Specifications terminology to that used in FNP procedures, which reduces the potential for misunderstanding and thereby increases confidence in proper operation of the CREFS.

To support proposed change 9, the FHA inside containment was re-analyzed with no credit for the containment purge and exhaust filter. In this case the purge and exhaust radiation monitor will detect the activity released to the containment and isolate the purge system. The time required to detect and isolate the purge, shown in Table 2, includes the time to purge the activity in the purge and exhaust ductwork downstream of the isolation valves. Other major parameters used in the analysis are also shown in Table 2. The results shown in Table 3 meet the SRP Section 15.7.4 criteria of maintaining offsite doses well within 10 CFR 100 guidelines, without credit for filtration of the exhausted activity. Therefore, it is acceptable to delete the containment purge exhaust filter from the Technical Specifications.

Proposed change 10 is required to maintain consistency between the affected Technical Specifications and their Bases.

TABLE 1

EVALUATION OF LEAKAGE FROM THE RECIRCULATION LOOP

Isotope	Recirculation Loop Concentration (μCi/gm)
I-131	2.7×10^4
I-132	4.0×10^4
I-133	5.9×10^4
I-134	6.2×10^4
I-135	5.5×10^4

Parameters	Values
Power level (MWt)	2831
Equivalent percent fuel failure	100
Fraction of iodine activity absorbed by sump water	0.5
Sump water volume	
RCS (ft3)	9,107
RWST (ft3)	40,100
Leak Rate	10 x FSAR Table 6.3-8
Fraction which flashes	0.1
PRF efficiency	Per Reg. Guide 1.52 for a 2 inch bed with relative humidity > 70%

TABLE 2

PARAMETERS USED IN FUEL HANDLING ACCIDENT ANALYSIS

	Accident in Containment	Accident in Fuel Storage Pool (Auxiliary Building)
Core thermal power (MWt)	2831	2831
Time from shutdown to accident (h)	100	100
Minimum water depth (ft)	23	23
Damage to fuel assembly	All rods ruptured	All rods ruptured
Activity release from assembly		
Kr-85	30%	30%
Other Noble Gases	10%	10%
I-131	12%	12%
Other Iodines	10%	10%
Radial peaking factor	1.7	1.7
Decontamination factor in water		
Iodine - Elemental	133	133
- Organic	1	1
Noble gases	1	1
Amount of mixing in building (ft^3)	6.6×10^5	1×10^5
Exhaust flow rate (cfm)	5.35×10^4	8000
Isolation time (sec)	45	None
Iodine filtration system	None	PRF
Filter efficiencies		
Elemental Iodine	--	90%
Organic Iodine	--	30%
Atmospheric dilution factors	(see FSAR table 15B-2)	(see FSAR table 15B-2)

TABLE 3

OFFSITE DOSES FROM FUEL HANDLING ACCIDENT

	Accident in Containment	Accident in Fuel Storage Pool Area
Site Boundary Dose (REM)		
Thyroid	12.1	51.3
Whole Body	0.4	0.4
Low-Population Zone Dose (REM)		
Thyroid	4.5	18.9
Whole Body	0.1	0.1

Enclosure 2

Joseph M. Farley Nuclear Plant
Control Room, Penetration Room, and Containment Purge Filtration Systems
and Radiation Monitoring Instrumentation
Technical Specification Changes

10 CFR 50.92 Evaluation

Enclosure 2

Joseph M. Farley Nuclear Plant
Control Room, Penetration Room, and Containment Purge Filtration Systems
and Radiation Monitoring Instrumentation
Technical Specification Changes

10 CFR 50.92 Evaluation

Pursuant to 10 CFR 50.92, SNC has evaluated the proposed amendments and has determined that operation of the facility in accordance with the proposed amendments would not involve a significant hazards consideration. The basis for this determination is as follows:

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

   The proposed changes to convert from ANSI N510-1980 to ASME N510-1989 for specific FNP filtration surveillance testing requirements and related changes do not affect the probability of any accident occurring. The consequences of any accident will not be affected since the proposed changes will continue to ensure that appropriate and required surveillance testing for FNP filtration systems will be performed consistent with the revised accident analyses. The results of the fuel handling accident remain well within the guidelines of 10 CFR Part 100 and the doses due to a LOCA, including ECCS recirculation loop leakage, remain within the guidelines of 10 CFR Part 100 and General Design Criterion 19 of Appendix A to 10 CFR Part 50. Relocating specific testing requirements to the FNP FSAR has no effect on the probability or consequences of any accident previously evaluated since required testing will continue to be performed.

   Therefore, the proposed TS 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 accident previously evaluated.

   Testing differences between ANSI N510-1980 and ASME N510-1989 have been evaluated by SNC and none of the proposed changes have the potential to create an accident at FNP. ASME N510-1989 has been endorsed and approved by the NRC for licensee use in NUREG 1431. Testing the additional channels of radiation monitoring and verification of penetration room boundary integrity do not require the affected systems to be placed in configurations different from design. Thus, no new system design or testing configuration is required for the changes being proposed that could create the possibility of any new or different kind of accident from any accident previously evaluated. Relocating specific testing requirements to the FSAR has no effect on the possibility of creating a new or different kind of accident from any accident previously evaluated since it is an administrative change in nature.

   Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Conversion from the testing requirements of ANSI N510-1980 sections 10, 12, and 13 to ASME N510-1989 sections 10, 11, and 15 has been previously approved by the NRC at other nuclear facilities. ASME N510-1989 has been approved and endorsed by the NRC in NUREG 1431. The safety factor associated with the conservative charcoal adsorber laboratory test methods and dose calculations ensures that doses will continue to meet the guidelines of 10 CFR Part 100 and GDC 19 of Appendix A to 10 CFR Part 50. The enhanced testing of radiation monitoring instrumentation and the penetration room boundary integrity provide additional assurance that the acceptance criteria of the safety analyses and the resultant margins of safety are not reduced. Relocating specific testing requirements to the FSAR has no effect on the margin of plant safety since required testing will continue to be performed. Clarifying the 10 hour run with heaters on is consistent with the Improved TS language and accomplishes the purpose for the surveillance. Therefore, SNC concludes based on the above, that the proposed changes do not result in a significant reduction of margin with respect to plant safety as defined in the Final Safety Analysis Report or the bases of the FNP technical specifications.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Conclusion

Based on the preceding analysis, SNC has determined that the proposed changes to the Technical Specifications will not significantly increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety. SNC therefore concludes that the proposed changes meet the requirements of 10 CFR 50.92(c) and do not involve a significant hazards consideration.