

acceptable since they are administrative and do not affect plant operation.

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

This license amendment request proposes to relocate the safety limits and overtemperature delta-T and overpower delta-T parameter values to the Core Operating Limits Report and to include, in the Technical Specifications administrative controls section, the appropriate references to the NRC approved methodologies which support determination of these limits and parameter values. The safety limits and overtemperature delta-T and overpower delta-T parameter values that are documented in the Core Operating Limits Report will be determined by NRC approved analytical methods and will be validated as part of the cycle specific reload evaluation process.

Safety limits are not assumed accident initiators. Thus relocation of the safety limits does not involve a significant increase in the probability of an accident. Overtemperature delta-T and overpower delta-T parameter values are inputs to the reactor trip system which is provided to mitigate the consequences of an accident. The reactor trip system is not an accident initiator and therefore, changes to input values do not increase the probability of an accident.

Safety limits define bounding values within which plant operation will not initiate an accident condition. Safety limits relocated to the Core Operating Limits Report and determined by use of NRC approved methodologies will continue to determine the safe limits of plant operation, thus this change does not involve a significant increase in the consequences of an accident. The reactor trip system, with inputs from the overtemperature delta-T and overpower delta-T trip functions, mitigates the consequences of accidents.

The overtemperature delta-T and overpower delta-T trip parameter values are determined to assure that the design limit departure from nucleate boiling ratio is met and fuel integrity is maintained. Overtemperature delta-T and overpower delta-T trip parameters relocated to the Core Operating Limits Report and values determined by use of NRC approved methodologies will continue to determine the inputs for these trip functions which mitigate the design basis accident consequences, thus this change does not involve a significant increase in the consequences of an accident.

Addition of references to NRC approved methodologies in the Technical Specifications administrative controls section is an administrative change which does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed miscellaneous administrative changes in the Technical Specifications administrative controls section do not affect plant operation and therefore do not involve a significant increase in the probability or consequences of an accident previously evaluated.

As discussed above, these proposed changes do not involve a significant increase

in the probability or consequences of an accident previously evaluated.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The malfunction of safety related equipment, assumed to be operable in the accident analyses, would not be impacted as a result of the proposed technical specification changes. No new failure mode has been created and no new equipment performance burdens are imposed. Therefore the possibility of a new or different kind of accident from those previously analyzed has not been created. The proposed administrative changes do not create the possibility of a new or different kind of accident from those previously analyzed.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

This license amendment request proposes to relocate the safety limits and overtemperature delta-T and overpower delta-T parameter values to the Core Operating Limits Report and to include, in the Technical Specifications administrative controls section, the appropriate references to the NRC approved methodologies which support determination of these limits and parameter values. This proposed change also allows these relocated limits and parameter values to be changed under licensee controls. Safety limits in the Core Operating Limits Report will be determined by use of NRC approved methodologies and will continue to determine the safe limits of plant operation. Overtemperature delta-T and overpower delta-T trip parameter values in the Core Operating Limits Report will be determined by use of NRC approved methodologies and will continue to determine the inputs for these trip functions which mitigate design basis accidents. The Safety Limits licensed safety margins are maintained. The Safety Limits conform to plant design bases and limit actual plant operation within analyzed and licensed boundaries. The methodology described in WCAP-8745, along with the low pressurizer pressure allowable value, ensures that the overtemperature delta-T and overpower delta-T trips will protect against fuel centerline melting and departure from nucleate boiling during Condition II events. Thus, these changes do not involve a significant reduction in the margin of safety.

This license amendment request proposes to delete references to an NRC Safety Evaluation and make some editorial corrections in the Technical Specifications administrative controls section. These changes are administrative and thus do not involve a significant reduction in the margin of safety.

Group 3—Revision of Pressurizer Pressure-Low reactor trip Allowable Value

TS 3.3.1, Table 3.3.1-1 (Page 2), "Reactor Trip System Instrumentation", Function 8.a, Pressurizer Pressure-Low: Increase Pressurizer Pressure-Low Allowable Value.

This license amendment request proposes to increase the Allowable Value defined in Table 3.3.1-1 for the Pressurizer Pressure-Low reactor trip.

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

This license amendment request proposes to increase the Allowable Value defined in Table 3.3.1-1 for the Pressurizer Pressure-Low reactor trip. Pressurizer Pressure-Low reactor trip is an input to the reactor trip system which is provided to mitigate the consequences of an accident. The reactor trip system is not an accident initiator and therefore, changes to the Pressurizer Pressure-Low Allowable Value do not involve an increase in the probability of an accident.

The Pressurizer Pressure-Low Allowable Value is being increased which is a conservative change. The increase in the Pressurizer Pressure-Low reactor trip Allowable Value will assure that the overtemperature delta-T and overpower delta-T reactor trip functions, with values determined in accordance with NRC approved methodologies, provide protection against fuel centerline melting and departure from nucleate boiling for overpower and overtemperature events. Therefore, this change does not involve an increase in the consequences of an accident previously evaluated.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

This proposed change does not involve a physical alteration of the plant; that is, no new or different type of equipment will be installed. This proposed change does not introduce any new mode of plant operation or change the methods governing normal plant operation. No new failure mode has been created and no new equipment performance burdens are imposed. Therefore the possibility of a new or different kind of accident from those previously analyzed has not been created.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

This license amendment request proposes to increase the Allowable Value defined in Table 3.3.1-1 for the Pressurizer Pressure-Low reactor trip. The Allowable Value is determined in accordance with an NRC accepted setpoint methodology with input from NRC approved analytical methods. These determinations are performed to conservatively bound the operating conditions defined by the Technical Specifications and to demonstrate meeting the regulatory acceptance limits.

Performance of analyses and evaluations for the cycle specific reload evaluation process will confirm that the operating envelope defined by the Technical Specifications continues to be bounded by the analytical basis and in no case exceeds the acceptance limits. The proposed Pressurizer Pressure-Low Allowable Value along with the overtemperature delta-T and overpower delta-T trips will protect against fuel centerline melting and departure from nucleate boiling during Condition II events. The proposed Allowable Value conforms to plant design bases and limits actual plant