

licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

#### Proposed Power Level Changes

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The stretch uprate evaluations performed included performance of accident analyses at uprated power parameters using approved methodologies. Results of these analyses continue to meet the event acceptance criteria. An evaluation of components and systems, including interface and control systems, that could be affected by the change in power level, were performed for the stretch power uprate. Components and systems will continue to function as designed and performance requirements for these systems will continue to be met. Additionally, the proposed change in power level was not found to initiate any accident, and therefore, does not increase the probability of an accident.

Dose consequences were evaluated using the uprated power parameters. Acceptance criteria continue to be met. Therefore, the change also does not increase the consequences of an accident.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

No new accident scenarios, failure mechanisms, or limiting single failures are introduced as a result of the proposed change. The change has no adverse effect on any safety related system and does not change the performance or integrity of any safety related system. Additionally, no new safety related equipment is being added or changed as a result of this proposed change in power. Therefore, the possibility of a new or different kind of accident is not created.

3. Involve a significant reduction in the margin of safety.

All analyses supporting the proposed uprated power condition continue to meet the appropriate acceptance criteria. Therefore, the proposed change does not involve a significant reduction in the margin of safety.

Therefore, there are no significant hazards associated with the changes in rated power level.

#### Proposed Safety Limit Change

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change is an industry accepted safety limit applicable to the KNPP transition to Westinghouse fuel. Therefore, the change does not increase the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

No new accident scenarios, failure mechanisms or limiting single failures are introduced as a result of the proposed change in fuel centerline temperature. The change has no adverse effect on the fuel or the performance or integrity of the fuel.

Therefore, the possibility of a new or different kind of accident is not created.

3. Involve a significant reduction in the margin of safety.

The proposed safety limit change is backed by technical evaluations performed by Westinghouse and experimental data. The limit is shown to be met as part of reload safety evaluations performed on a cycle specific basis. All applicable analyses supporting the proposed uprated power condition continue to meet the appropriate acceptance criteria. Therefore, the proposed change does not involve a significant reduction in the margin of safety.

Therefore, there are no significant hazards associated with the change in the safety limit. Engineered Safety Feature (ESF) Setting Change

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The stretch power uprate evaluations performed included performance of accident analyses. Results of the accident analyses have verified that the acceptance criteria continue to be met. Neither the change in the analytical limit nor the change in the TS setting limit changes how the system functions. Systems will continue to function as designed and system performance criteria will continue to be met. Dose consequences have also been evaluated at uprate conditions and doses remain within the appropriate acceptance criteria. Therefore, the change does not increase the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

No new accident scenarios, failure mechanisms, or limiting single failures are introduced as a result of the proposed change. The change has no adverse effect on any safety related system and does not change the performance or integrity of any safety related system. Additionally, no new safety related equipment is being added or changed as a result of the proposed change in the high-high steam flow TS setting limit. Therefore, the possibility of a new or different kind of accident is not created.

3. Involve a significant reduction in the margin of safety.

The results of the accident analyses demonstrate the acceptance criteria continue to be met. Systems will continue to function as designed and system performance criteria continue to be met. Therefore, the proposed change does not involve a significant reduction in the margin of safety.

Therefore, there are no significant hazards associated with the change in the high-high steam flow TS setting limit.

#### Proposed Containment Cooling Systems Change

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

Removal of the LCO [limiting condition for operation] is conservative in that it eliminates relaxation of a design requirement for system redundancy. Deletion of the less conservative condition is more conservative

by definition. Maintaining the system in a more conservative condition cannot create new challenges to components and systems that could adversely affect their ability to mitigate accident consequences or diminish the integrity of any fission product barrier. Therefore, the deletion of the LCO does not increase the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

Maintaining the system in a more conservative condition does not adversely affect any fission product barrier, nor does it alter the safety function of safety related systems, structures, and components depended upon for accident prevention or mitigation. Equipment important to safety will continue to function at its design capacity. No new equipment is being added, replaced, or taken away by the deletion of the LCO. Therefore, the possibility of a new or different kind of accident is not created.

3. Involve a significant reduction in the margin of safety.

Safety analysis acceptance criteria continue to be satisfied for containment heat removal with deletion of this LCO. Therefore, the proposed change does not involve a significant reduction in the margin of safety.

Therefore, there are no significant hazards associated with the containment cooling systems change.

#### Proposed Condensate Storage Tank (CST) Changes

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The stretch power uprate project evaluations performed included a review of the SBO [station blackout] event. Results of the evaluation verified that with the increase in the CST [condensate storage tanks] inventory, the evaluation criteria continue to be met. Systems will continue to function as designed and system performance criteria will continue to be met. Additionally, dose consequences have been evaluated for the power uprate and results remain within the appropriate acceptance criteria. Therefore, the changes to CST inventory do not increase the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

No new accident scenarios, failure mechanisms, or limiting single failures are introduced as a result of the proposed changes. The changes have no adverse effect on any safety related system and do not change the performance or integrity of any safety related system. Additionally, no new safety related equipment is being added or changed as a result of the proposed changes in inventory. Therefore, the possibility of a new or different kind of accident is not created.

3. Involve a significant reduction in the margin of safety.

The results of the SBO event review have verified that the analysis criteria continue to be met. Systems will continue to function as designed and system performance criteria