

trains being inoperable due to an inoperable control room boundary, and revising the relettered Condition F to add "for reasons other than Condition B." TS Surveillance Requirement (SR) 3.7.12.3 would be revised to limit its applicability and TS 3.7.13, "Fuel Handling Building Ventilation System (FHBVS)," would be revised to add the word "recently" to qualify the irradiated fuel in the statement of applicability. These proposed revisions are made consistent with NUREG-1431, Revision 2, "Standard Technical Specifications Westinghouse Plant," April 2001, and limit unnecessary surveillance testing when the ABVS is actively performing its safety function.

*Basis for proposed no significant hazards consideration determination:* As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

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

The proposed changes revise the frequency (from 18 months to 24 months), and acceptance criteria for laboratory testing of the charcoal adsorbers in the engineered safety feature (ESF) ventilation systems. The testing is performed offsite on charcoal samples taken from the ventilation systems, and would have no impact on any accident initiator, or change the consequences of any previously analyzed accident. Continued compliance with industry standards and Diablo Canyon Power Plant test data ensure that the revised requirements would continue to ensure the charcoal adsorbers are capable of performing their intended safety function; therefore, the changes would not affect the accident mitigation capabilities of the ESF ventilation systems.

The preheaters in the control room ventilation system (CRVS) and auxiliary building ventilation system (ABVS) are not initiators of analyzed events, are no longer credited in mitigating design basis accidents or transients, and are therefore not required for system operability. The deletion of the requirement to demonstrate the capability of the preheaters every 24 months, and the changes to the action requirements and surveillance requirements for the CRVS and ABVS would not affect the assumed accident mitigation capabilities of these ESF ventilation systems.

The proposed changes also provide for two trains of the CRVS to be inoperable for up to 24 hours as a result of the CRVS boundary being inoperable. This allowance is contingent on providing and implementing proceduralized compensatory measures to restore the boundary during that time period. Although this change does provide for an increase in the allowed time for continued plant operation in the applicable modes, its acceptability is based on the low probability of any design basis accident during that time

period and the protection provided by the compensatory measures that would be established. In addition, this change has no impact on any accident initiator, and does not change the consequences of any previously analyzed accident, because the administrative controls will restore the boundary before it is required to protect control room personnel.

The proposed changes also provide for limiting the applicability of surveillance requirement (SR) 3.7.12.3, which verifies the operability of the ABVS on a safety injection (SI) signal. The limitation is imposed only when the ABVS is aligned and operating in its safety function configuration. Since the ABVS is already performing its safety function when it is in that condition, verifying the automatic capability to transfer to that configuration is unnecessary. Since this limitation is only during periods where the ABVS is in its safety function configuration it has no impact on any accident initiator, or change the consequences of any previously analyzed accident. In addition, this surveillance is still required to be current whenever the ABVS is returned to automatic.

The proposed changes also provide for limiting the required operability of the fuel handling building ventilation system (FHBVS) based on a minimum time period that all fuel assemblies in the fuel pool have not been part of a critical core. This change does reduce the current operability requirements for the FHBVS and increases the consequences of a fuel handling accident with the FHBVS inoperable. However, limiting the FHBVS operability requirements does not increase the probability of any accident, and as determined in the new fuel handling accident (FHA) analysis, the potential release levels are still well within acceptable limits and do not significantly increase the consequences of a FHA.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of any accident previously evaluated.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The ABVS, FHBVS and CRVS are accident response systems and as such cannot create accidents. The changes to the charcoal sample test requirements will not affect the method of operation of the systems. The proposed changes only affect the laboratory test acceptance criteria for the charcoal samples, and how the charcoal preheaters are credited for meeting technical specification (TS) requirements. These changes result in a more conservative testing methodology. Deletion of the preheater requirements from the TS is based on the heaters not being credited for mitigation of any accident condition and does not affect the operation of these systems. The design and operation of the CRVS, ABVS, and FHBVS are not affected by these changes. No new or different accident scenarios, transient precursors, failure mechanisms, or limiting single failures will be introduced as a result of these changes.

The proposed changes also provide for two trains of the CRVS to be inoperable for up to

24 hours as a result of the CRVS boundary being inoperable. This allowance requires proceduralized compensatory measures to protect the operators during that time period. Although this change does provide for an increase in the allowed time for continued plant operation, its acceptability is based on the low probability of any design basis accident during that time period and the protection provided by the compensatory measures that would be established. The design and operation of the control room ventilation system is not affected by this change.

The proposed changes also provide for limiting the applicability of SR 3.7.12.3, which verifies the operability of the ABVS on an SI signal. The limitation is imposed only when the ABVS is aligned and operating in its safety function configuration. Since the ABVS is already performing its safety function when it is in this condition, verifying the automatic capability to transfer to this configuration is unnecessary. Since this limitation is only during periods where the ABVS is in its safety function configuration, it does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes also provide for limiting the required operability of the FHBVS based on a minimum time period that all fuel assemblies in the fuel pool have not been part of a critical core. This change does reduce the current operability requirements for the FHBVS by limiting these requirements to the period when the system would be required to mitigate the radiological consequences of an accident to acceptable limits. However, the design and operation of the FHBVS is not affected by this change.

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 change does not involve a significant reduction in a margin of safety.

The charcoal adsorber sample laboratory testing protocol accurately demonstrates the required performance of the adsorbers in the CRVS and ABVS following a design basis accident or in the FHBVS following a fuel handling accident outside containment. The changes in charcoal testing acceptance criteria and frequency will not affect system performance or operation. They will continue to ensure that the charcoal will perform its safety function. The decontamination efficiencies used in the offsite and control room dose analyses are not affected by this change. Therefore the offsite and control room dose analyses are not affected by this change, and offsite and control room doses will remain within the limits of 10 CFR 100 and 10 CFR 50, Appendix A, GDC [General Design Criterion] 19. Although there is a reduction in the safety factor provided by the previous testing protocol, the revised testing protocol follows current industry standards. These standards ensure adequate margin exists and that the charcoal will perform its design basis function. As a result, there is no significant reduction in [in] a margin of safety.

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