

thermal margin/low pressure (TM/LP) trip equation. The proposed change would reduce calculated values for the variable TM/LP trip equation. The proposed equation constant value change results from improvements in plant equipment used to establish the TM/LP trip setpoint. Ultrasonic feedwater flow measurement devices, recently installed at the Palisades Plant, result in less uncertainty applied in the methodology used for determining core power level. Additionally, the devices used to calculate the TM/LP trip setpoint have previously been replaced with devices having less uncertainty. These reduced uncertainties, when combined using the NRC-endorsed methodology described in ANSI/ISA-S67.04-1994, "Setpoints for Nuclear Safety-Related Instrumentation," result in a reduction in the constant (bias term) used to calculate the TM/LP trip setpoint.

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:

The following evaluation supports the finding that operation of the facility in accordance with the proposed change would not:

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

The proposed amendment does not involve operation of any required structures, systems or components (SSCs) in a manner or configuration different from those previously recognized or evaluated. The methodology that was used in determining the recommended change in the constant follows Nuclear Regulatory Commission endorsed standard ANSI/ISA-S67.04-1994, "Setpoints for Nuclear Safety-Related Instrumentation." The probability of an accident previously evaluated will not be increased since the proposed change to the constant value in the Thermal Margin/Low Pressure (TM/LP) trip equation maintains all necessary considerations in the development of uncertainties.

The consequences of an accident previously evaluated will not be increased since the reactor is still protected from violating the TM/LP trip setpoint used in the safety analysis for the Palisades Nuclear Plant.

Therefore, operation of the facility in accordance with the proposed change to the Technical Specifications would not involve a significant increase in 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.

The proposed change to the constant value for the TM/LP trip equation in the Technical

Specifications would not change or add a system function. The proposed amendment does not involve operation of any required SSCs in a manner or configuration different from those previously recognized or evaluated. No new failure mechanisms will be introduced by the change being requested.

Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed change to the constant value for the TM/LP trip equation in the Technical Specifications accounts for all uncertainties that affect the TM/LP trip setpoint. The revised TM/LP trip setpoint will continue to assure that the acceptance criteria established in the safety analysis will be met.

Therefore, this change does not involve a significant reduction in the margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

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**Pacific Gas and Electric Company,
Docket Nos. 50-275 and 50-323, Diablo
Canyon Nuclear Power Plant, Unit Nos.
1 and 2, San Luis Obispo County,
California**

Date of amendment requests: July 24, 2003.

Description of amendment requests: The proposed change will revise Technical Specification (TS) Section 3.8.4, "DC Sources—Operating"; TS Section 3.8.5, "DC Sources—Shutdown"; and TS Section 3.8.6, "Battery Cell Parameters." The proposed change will also add a new section to TS 5.5, "Programs and Manuals" for the maintenance and monitoring of the station safety-related batteries that is based on the recommendations of the Institute of Electrical and Electronics Engineers (IEEE) Standard 450-1995.

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 change affects Technical Specification (TS) sections 3.8.4 "DC

Sources—Operating," TS 3.8.5 "DC Sources—Shutdown," TS 3.8.6 "Battery Cell Parameters," and TS Administrative Controls section 5.5.

The proposed change restructures the TS for the direct current (DC) electrical power subsystem and adds new Conditions and Required Actions with increased Completion Times to address battery charger inoperability. Neither the DC electrical power subsystem nor associated battery chargers are initiators of any accident sequence analyzed in the Final Safety Analysis Report Update (FSARU). Operation in accordance with the proposed TS ensures that the DC electrical power subsystem is capable of performing its function as described in the FSARU. Therefore the mitigating functions supported by the DC electrical power subsystem will continue to provide the protection assumed by the analysis.

The relocation of preventive maintenance surveillances, and certain operating limits and actions to a newly-created, licensee-controlled TS 5.5.17, "Battery Monitoring and Maintenance Program," will not challenge the ability of the DC electrical power subsystem to perform its design function. The maintenance and monitoring required by current TS, which are based on industry standards, will continue to be performed. In addition, the DC electrical power subsystem is within the scope of 10 CFR 50.65, "Requirements for monitoring the effectiveness of maintenance at nuclear power plants," which will ensure the control of maintenance activities associated with the DC electrical power subsystem.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an 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 proposed change does not involve any physical alteration of the units. No new equipment is being introduced, and installed equipment is not being operated in a new or different manner. There are no setpoints at which protective or mitigating actions are initiated that are affected by the proposed changes. The operability of the DC electrical power subsystems in accordance with the proposed TS is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the plant. The proposed change will not alter the manner in which equipment operation is initiated, nor will the functional demands on credited equipment be changed. No alteration in the operating procedures, which ensure the unit remains within analyzed limits, is proposed, and no change is being made to procedures relied upon to respond to an off-normal event. As such, no new failure modes are being introduced. The proposed change does not alter assumptions made in the safety analyses.

Therefore, the proposed change does not create the possibility of a new or different accident from any accident previously evaluated.

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