

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 requested amendments involve no significant hazards consideration.

Attorney for licensee: Mr. Edward J. Cullen, Deputy General Counsel, Exelon BSC—Legal, 2301 Market Street, Philadelphia, PA 19101.

NRC Section Chief: Anthony J. Mendiola.

Exelon Generation Company, LLC, Docket Nos. STN 50–454 and STN 50–455, Byron Station, Unit Nos. 1 and 2, Ogle County, Illinois.

Docket Nos. STN 50–456 and STN 50–457, Braidwood Station, Unit Nos. 1 and 2, Will County, Illinois.

Date of amendment request: June 27, 2003.

Description of amendment request: The proposed amendment would revise TS 3.4.10, "Pressurizer Safety Valves," by changing the existing pressurizer safety valve (PSV) lift settings from "3 2460 psig and 2 2510 psig," to "3 2411 psig and 2 2509 psig." The existing TS represents a $\pm 1\%$ tolerance band around a lift setting of 2485 psig. The proposed lift setting range of "3 2411 psig and 2 2509 psig" represents a $\pm 2\%$ tolerance band around a lift setting of 2460 psig.

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

Reanalysis/evaluations were performed to assess all transients that could be potentially impacted by the proposed PSV lift setting and tolerance band change. The proposed change in the PSV tolerance from $\pm 1\%$ to $\pm 2\%$ with a reduction in the lift setting from 2485 psig to 2460 psig allows a decrease in the valve minimum opening pressure and therefore, provides earlier pressurizer relief and a reduced RCS pressure. The proposed change does not affect the maximum opening pressure assumed in the non-LOCA analyses since the proposed change in maximum PSV opening pressure is insignificant and in the conservative direction. Therefore, only those transients for which it is conservative to minimize the RCS pressure (*i.e.*, DNB and pressurizer overflow concerns) are potentially impacted by the proposed change. The reanalyses/evaluations of all the affected transients demonstrated acceptable results with no significant increase in the probability or consequences.

Further, any evaluations performed on an overpressure transient conservatively assume the upper limit of the PSV tolerance. The proposed change to the lower tolerance limit of the PSV lift setting means that an overpressure transient may be terminated at a pressure that is lower than assumed in the analysis. It has also been determined that the transient analyses are not adversely affected because the limiting transients are not sensitive to the pressure tolerance decrease. Therefore, the primary system pressure boundary is not challenged by the PSV lower tolerance limit change. The assumed maximum PSV lift setting was not changed, and therefore, does not impact analyses performed for overpressure transients. It has been determined that the design relieving capacity of the PSVs can still be met with the reduction in PSV setpoint. Except for the PSV lower lift setting and increased tolerance, the design and operation of the PSVs remains unchanged.

Based on this analysis, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated in the Byron/Braidwood Stations Updated Final Safety Analysis Report.

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

The proposed change in the PSV tolerance from $\pm 1\%$ to $\pm 2\%$ with a reduction in the lift setting from 2485 psig to 2460 psig allows a decrease in the valve minimum opening pressure and therefore provides earlier pressurizer relief and a reduced RCS pressure. The proposed change does not affect the maximum opening pressure assumed in the accident analyses since the proposed change in maximum PSV opening pressure is insignificant and in the conservative direction. The pressurizer PORVs serve to minimize challenges to the PSVs. An assessment of the impact of reducing the PSV lift setpoint and increasing the tolerance has determined that the resulting margin is sufficient to ensure that the PORVs will actuate prior to the PSVs. Except for the PSV lower lift setting and increased tolerance, the design and operation of the PSVs remain unchanged.

The proposed change does not involve the use or installation of new equipment and all currently installed equipment will not be operated in a new or different manner. No new or different system interactions are created and no new processes are introduced. The proposed change will not introduce any new failure mechanisms, malfunctions, or accident initiators not already considered in the design and licensing bases.

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

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

The PSVs provide, in conjunction with the reactor protection system, overpressure protection for the RCS. The PSVs are designed to prevent the system pressure from exceeding the system safety limit, 2735 psig,

which is 110% of the design pressure. The change in the upper limit of the PSV tolerance from $+1\%$ to $+2\%$ with a reduction in the nominal setpoint from 2485 psig to 2460 psig does not challenge the upper limit of the overpressure protection. The change in PSV maximum opening lift setting is insignificant and in the conservative direction with respect to overpressure protection, therefore, the proposed change does not impact analyses performed for overpressure transients. For all non-LOCA events, the analyses/evaluations support the change in PSV lift setting and tolerance from 2485 psig $\pm 1\%$ to 2460 psig $\pm 2\%$. The LOCA analyses are not impacted because the transient results in a decrease in RCS pressure and therefore, will not challenge the PSV opening pressure lift setting. The change in the PSV lift setting and tolerance also has no effect on the reactor protection or engineered safety features systems trip set points. Thus, the proposed change does not involve a significant reduction in any margin of safety.

Based on the above discussions, it has been determined that the requested TS change does not involve a significant increase in the probability or consequences of an accident previously evaluated; or 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.

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 requested amendments involve no significant hazards consideration.

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FirstEnergy Nuclear Operating Company, Docket No. 50–346, Davis-Besse Nuclear Power Station, Unit 1, Ottawa County, Ohio.

Date of amendment request: August 25, 2003.

Description of amendment request: The proposed amendment would revise the Steam and Feedwater Rupture Control System (SFRCS) instrumentation Technical Specifications (TSs) to clearly identify the appropriate actions to be taken if an SFRCS instrumentation channel's output logic becomes inoperable; relocate the SFRCS instrumentation trip setpoints from the TSs to the Updated Safety Analysis Report; and decrease the SFRCS instrument channel functional test frequency from monthly to quarterly and make associated changes to the trip setpoint allowable values.

Basis for proposed no significant hazards consideration determination: