calculations have been performed to verify that sufficient margin exists between the recommended calibration setpoints and the analytical limits for these instrument channels to account for all applicable instrument errors. This provides high assurance that the trip setpoints of these instrument channels will not drop below the minimum required value. The "keep filled" instrumentation is not a factor in the assumptions of any accidents, thus, the probability of analyzed accidents is not increased.

b. The proposed technical specification amendment does not revise the configuration of the ECCS and RCIC discharge line "keep filled" instrument channels or sensing lines. The proposed setpoint allowable values and associated calibration setpoints are within the calibration ranges of the existing pressure switches. Thus, implementation of the proposed amendment does not involve any physical alterations to the plant except for the recalibration of the pressure switches to the new calibration setpoints.

c. The ECCS and RCIC discharge line "keep filled" instrument channels only perform a monitoring function. Other than ensuring system readiness they do not perform a function important to safety. Thus, the probability of a ECCS or RCIC failure is not increased since the operation and function of the ECCS and RCIC discharge line fill systems is not affected by this change.

d. The failure of a ECCS or RCIC discharge line fill system will not go undetected by the proposed change, since water leg pump trips are annunciated in the control room. In addition, quarterly surveillances are performed on these pumps to check for degradation.

e. The ECCS and RCIC discharge line fill systems are not used to mitigate the consequences of an accident or transient. These systems are not required after the ECCS and RCIC pumps are activated.

Therefore, the proposed change does not cause an 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 because: This technical specification amendment only lowers the trip setpoint allowable values for the ECCS and RCIC discharge line "keep filled" alarm instrumentation channels. As described above, the proposed setpoint allowable values are sufficient for verifying that the ECCS and RCIC discharge lines are full of water. Thus, the probability of a water hammer occurring during system activation for a surveillance test is not increased. In addition, each instrument channel is independent from the other channels so that a failure in one channel will not propagate to another channel. Therefore, the operation of the facility in accordance with the proposed amendment does not create the possibility of a new or different kind of accident

(3) Involve a significant reduction in the margin of safety because: The margin of safety is not affected by this amendment, because this change involves monitoring instrumentation only. The purpose of the ECCS and RCIC discharge line "keep filled" alarms is to alert the operators when a ECCS or RCIC system may not be operable due to empty or partially empty discharge lines. The proposed amendment does not alter or degrade this function, since the new setpoint allowable values are adequate for verifying that the discharge lines are full of water. Therefore the operation of the facility in accordance with the proposed amendment does not 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.

*Local Public Document Room location:* Public Library of Illinois Valley Community College, Rural Route No. 1, Oglesby, Illinois 61348.

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Consumers Power Company, Docket No. 50–255, Palisades Plant, Van Buren County, Michigan

Date of amendment request: January 13, 1995

Description of amendment request: The proposed amendment would modify the required settings, and allowable "as found" and "as left" tolerances for the primary and secondary safety valves. The proposed limits would allow installed primary and secondary valve settings to be within a 3% tolerance of their nominal settings, but would require returning the valve settings to within 1% of the nominal settings if the valves are removed from the piping for maintenance or testing.

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 technical specification change would not:

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

The proposed change to the Technical Specifications increases the acceptable as found tolerance for the pressurizer safety valves. The most limiting overpressure event, loss of external load, has been analyzed to account for this change. The loss of external load analysis was performed using a conservative 25% steam generator tube

plugging and an initial pressurizer level of 67.8% (providing an approximate 10% conservative margin above programmed pressurizer level for full power). Primary and secondary safety valve accumulation was conservatively accounted for and the setpoint tolerance of +3% was assumed. Reactor trip on turbine trip was assumed to be disabled and the atmospheric dump valves were assumed unavailable. The results of the analysis demonstrated primary and secondary system pressures within 110% of design pressures. Therefore, the consequences of overpressurization events will not be significantly increased with a +3% tolerance on the primary safety valve setpoints. The proposed Technical Specifications change will not affect normal plant operation and will not increase the probability of an accident.

A review of all DNB [departure from nucleate boiling] analyses was performed to ensure that predicted pressurizer pressures for those analyses would not be affected by a -3% tolerance on the lowest setpoint valve. The DNB analyses for which significant primary system pressure increases were predicted do not result in pressures high enough to lift the pressurizer safety valves with the proposed tolerance. A conservative DNB analysis that bounds the consequences of inadvertent opening of a pressurizer safety valve has also been previously performed with predicted acceptable results. If a pressurizer safety valve were to stick open, the consequences would be bounded by the small break LOCA [loss-of-coolant accident] analysis. Therefore, the consequences due to a -3% tolerance on the primary safety valve setpoints will not increase the consequences or probability of an accident.

The proposed revision removes the requirement for one operable pressurizer safety valve to be installed whenever the reactor head is on the vessel. Instead, proposed Specification 3.1.7.1 requires all pressurizer safety valves to be operable above cold shutdown, and overpressure protection during cold shutdown is provided by existing Specification 3.1.8.2, Power Operated Relief Valves.

The proposed Technical Specifications change also lists the lift settings for each of the primary and secondary system safety valves. This change will not affect the operation or function of the valves. Therefore, the probability and consequences of previously evaluated accidents will not be increased.

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

The proposed changes to Technical Specifications will not affect the manner in which the plant operates. The proposed increase in pressurizer safety valve lift setting tolerance could change the pressure at which the valves open in an overpressurization event, but would not create the possibility of a new or different kind of accident. Since Technical Specification 3.1.8 addresses primary system overpressurization during cold shutdown, the proposed removal of the requirement for an operable pressurizer safety valve to be installed whenever the reactor head is on the vessel will not create