rem to .76 rem for the alternate treatment method. The increase in control room dose is not significant since the revised doses are well below the regulatory limits, i.e., .76 rem calculated versus the limit of 5 rem in the control room. The two-hour whole body dose at the Exclusion Area Boundary (EAB) decreased slightly from 2.47 rem to 2.217 rem.

The 30-day thyroid dose at the LPZ increased from 30.4 rem for the MSIV-LCS treatment method to 41.74 rem for the alternate treatment method. This increase is not significant since the revised dose of 41.74 rem is well within the regulatory limit of 300 rem. The two-hour thyroid dose at the EAB decreased slightly from 127.8 rem to 125.61 rem. The 30-day control room thyroid dose increased from 14.19 rem for the MSIV-LCS treatment method to 18.55 rem for the alternate treatment method. The increased control room thyroid dose is not significant since the revised dose remains well below the regulatory limit of 30 rem.

The 30-day control room beta dose increased insignificantly from 12 rem for the MSIV-LCS treatment method to 12.17 rem for the alternate treatment method, remaining a small fraction relative to the limit of 75 rem.

In summary, the proposed changes discussed above do not result in a significant increase in the radiological consequences of a LOCA when the same assumptions and methods specified in the FSAR are used, recognizing that radiological consequences calculated in the FSAR and for these proposed changes are significantly higher than those using more realistic assumptions and methods. Nevertheless, the calculated off-site and control room doses resulting from a LOCA remain well below the regulatory limits.

The proposed change to TS Table 3.6.3-1 deletes the LCS valves from the list of primary containment isolation valves. This proposed change is consistent with the proposed deletion of the LCS. The LCS lines that are connected to the main steam piping are welded and/or capped closed to assure primary containment integrity is maintained. The welding and post weld examination procedures will be in accordance with American Society of Mechanical Engineers (ASME) Code, Section III requirements These welds and/or caps will be periodically tested as part of the Containment Integrated Leak Rate Test (CILRT). This proposed change does not involve an increase in the probability of equipment malfunction previously evaluated in the FSAR. In fact, this proposed change reduces the probability of equipment malfunction since, upon implementation of these proposed changes, the plant will be operated with less primary containment isolation valves subjected to postulated failure. This proposed change has no effect on the consequences of an accident since the LCS lines will be welded and/or cap closed, thus assuring that the containment integrity, isolation and leak test capability are not compromised.

The proposed change to TS Table 3.8.4.2.1-1 deletes the LCS motor operated valves from the list of "Motor Operated Valves Thermal Overload Protection - Continuous." The proposed change has no effect on the probability or consequences of an accident since the valves are eliminated and not performing a safety function.

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

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

As stated in Section I, the proposed changes do not involve a change to structures, components, or systems that would affect the probability of an accident previously evaluated , nor would these changes create any new or different kind of accident from any previously evaluated. The proposed changes will introduce and take credit for a new level of operational performance for existing plant systems and components to mitigate the consequences of the accident. The effect on this equipment has been evaluated and found to provide an acceptable level of reliability resulting in the required level of protection. This conclusion is based on the evaluation performed in NEDC 31858P, Revision 2, and the plant specific seismic evaluation provided in the Enclosure 2 [of application dated November 21, 1994], "MSIV Leakage Alternate Treatment Method Seismic Evaluation." The Leakage Control System has been installed to direct any leakage past the MSIVs during the LOCA; acting after the accident has occurred. The resulting consequences of the evaluated accidents have been affected as discussed in Section I resulting in no significant increase in the probability or consequences of said accident. Therefore, reliance on different equipment than previously assumed to mitigate the consequences of an accident does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The BWROG evaluated MSIV performance and concluded that MSIV leakage rates up to 200 scfh per valve will not inhibit the capability and isolation performance of the MSIVs to effectively isolate the primary containment. Implementation of the proposed changes does not result in modifications which could adversely impact the operability of the MSIVs. The LOCA has been analyzed using the main steam piping and main condenser as a treatment method to process MSIV leakage at the proposed maximum rate of 100 scfh per main steam line, not to exceed 300 scfh total for all four main steam lines. Therefore, the proposed TS Section 3.6.1.2 change to increase the allowed MSIV leakage rate does not create any new or different kind of accident from any accident previously evaluated.

The proposed TS Section 3.6.1.4 change to eliminate the LCS does not create the possibility of a new or different kind of accident from any accident previously evaluated because the removal of the LCS does not affect any of the remaining SSES Unit 1 and Unit 2 systems, and the LOCA has been re-analyzed using the proposed alternate method to process MSIV leakage. The associated proposed change to delete the LCS isolation valves from TS Table 3.6.3-1 and Table 3.8.4.2.1-1 does not create the possibility of a new or different kind of accident. The affected main steam piping will be welded and/or capped closed to assure that the primary containment integrity, isolation, and leak testing capability are not compromised. The affected LCS motor operated valves will be eliminated so their thermal overloads will not need to be bypassed.

Therefore, as discussed above, the proposed changes do not create the possibility for any new or different kind of accident from any accident previously evaluated.

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

The proposed change to TS Section 3.6.1.2 to increase the MSIV allowable leakage does not involve a significant reduction in the margin of safety. As discussed in the current Bases for TS Section 3/4.6.1.2, the allowable leak rate limit specified for the MSIVs is used to quantify a maximum amount of leakage assumed to bypass primary containment in the LOCA radiological analysis. Accordingly, results of the re-analysis supporting these proposed changes are evaluated against the dose limits contained in 10CFR100 for the off-site doses, and 10CFR50, Appendix A, GDC 19, for the control room doses. As discussed above, sufficient margin relative to the regulatory limits is maintained even when assumptions and methods (e.g., RG 1.3) that are considered highly conservative relative to more realistic assumptions and methods are used in the analysis.

Results of the radiological analysis demonstrate that the proposed changes do not involve a significant reduction in the margin of safety. Whole body doses, in terms of margin of safety, are insignificantly reduced by .38 rem in the control room. The margin of safety remains constant for the LPZ whole body dose or actually increases by .253 rem for the EAB whole body dose. The margin of safety for thyroid dose category is reduced by 11.34 rem at the LPZ and 4.36 rem in the control room. The margin of safety is found to increase for the EAB thyroid dose by 2.19 rem. The margin of safety for beta dose is insignificantly reduced by .17 rem in the control room. The reductions in the margin of safety are not significant since the revised calculated doses are highly conservative yet remain well below the regulatory limits, and therefore, a substantial margin to the regulatory limits is maintained.

The proposed change to eliminate the LCS from TS Section 3.6.1.4 does not reduce the margin of safety, in fact, the overall margin of safety is increased. The function of the LCS for MSIV leakage treatment will be replaced by alternate main steam drain lines and condenser equipment. This treatment method is effective in reducing the dose consequences of MSIV leakage over an expanded operating range compared to the capability of the LCS and will, thereby, resolve the safety concern that the LCS will not function at MSIV leakage rates higher than the LCS design capacity. Except for the requirement to establish a proper flow path from the MSIVs to the condenser, the proposed method is passive and does not require any new logic control and interlocks. This proposed method is consistent with the